May 18, 2020

TO: Ms. Sheila Poole

Commissioner OCFS

c/o: *REGCOMMENTS@ocfs.ny.gov*

Re: **Comments in response to notice of proposed rule amending section 444 of Title 18 NYCRR – ID No. CFS-04-20-00009-P -- establishing standards for the approval and administration of host family homes**

Ms. Poole,

As an impacted parent of the Child Welfare System, I am writing in opposition of the OCFS Host Homes Regulations that would allow Host Home Agencies to operate in the State of New York.

Your proposed regulations replicates the current system we have. The host agency mirrors the foster care agency. The family coach is a mandated reporter with similar responsibilities as the agency case planner. The volunteer host family undergoes the same training as foster care parents.

As an impacted parent I have a problem with parents signing agreements in crisis, without an attorney. This is never a good idea. While it may serve immediate needs, the long term impact on the family can be devastating.

Both the regulations and the Safe Families for Children parental agreement support protect the host family, not the parent. As a parent with lived experience impacted by the Child Welfare System, parents need to be informed, protected and supported. Safe Families for Children, the organization that created the Host Family Home model, does not do this.

We oppose the regulations and look forward to OCFS withdrawing them.

Respectfully,