

# Rise

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Commissioner David Hansell  
Administration for Children's Services  
150 William St., 18<sup>th</sup> Fl.  
New York, NY 10038

December 6, 2019

Dear Commissioner Hansell,

Rise is writing to offer feedback on ACS' Concept Paper on Foster Care and Residential Treatment. Our comments here reflect the input of parents who contribute to Rise and who work in the field as parent advocates in foster care and legal agencies. Our comments related to the role, training and support of life-experienced parent advocates also reflect discussions with staff at foster care and legal agencies that have life-experienced parent advocates on staff.

We are pleased to see the language that "foster care providers will employ Parent Advocates to support and engage parents throughout the life of the case and to assist families with accessing peer advocate services in the community." We hope that by "parent advocates," ACS means parents with life experience facing the foster care system and that this will be spelled out in the contracts. Parents involved with Rise consistently report that relationships with parent advocates in foster care and legal agencies are transformative in coping with their cases. In our frontline work with foster care agency partners, we also have seen how effective practices to inform and engage parents can be more successful when done by a parent advocate. It's crucial to ensure that all parents experiencing the stress and trauma of family separation have access to a parent advocate who has truly walked in their shoes.

We also applaud ACS for including in this concept paper some promising objectives:

- 1) Increased placement with kin and training of all foster parents in therapeutic parenting strategies;
- 2) An enhanced family foster care model to offer therapeutic assistance and casework continuity to all families;
- 3) A commitment to short-term residential placements for youth;
- 4) Core onboarding training so that caseworkers are more likely to be able to interact sensitively with parents and children and to sustain working in frontline casework;
- 5) Investment in Family Time so that parents and children are more likely to visit under humane conditions, be oriented and supported in the experience of supervised visits, and move quickly to unsupervised time;
- 6) Performance-based contracting, assuming that means an emphasis on reunification so that families are served by the agencies most capable of safe, timely reunification;
- 7) Commitment to open adoption for children unable to return home. Hopefully, this extends to supporting the Preserving Family Bonds bill in becoming law.

We were also surprised and pleased to see that ACS is interested in working from parents' ideas for improving frontline practice with parents, as outlined in Rise's Insights paper *Power and Partnership*. Our Reunification Collaborative has begun to explore how to meaningfully implement these ideas. We would welcome a discussion of how parents can lead this work at scale, which would require a significant investment in both parent leadership and agency capacity.

Another surprise was the lack of synchronicity between the vision expressed in this paper about foster care and residential programs and the concept paper on prevention. Although the stated intention is to create a seamless system, the preventive concept paper emphasized connections between providers and their service communities, quality of services supported by tested case practice models, an approach that acknowledges racism and economic inequality as drivers of child welfare involvement, language around the need for a justice lens on child welfare, and structures for parent voice in providing feedback on service design and delivery. These concepts were notably absent in this vision for foster care.

Our major concern, however, is that the paper does not describe reunification as the primary goal of foster care casework, as it is by law for most children when they enter care. When children enter foster care in New York City, fewer than one-third of families reunite within one year and fewer than two-thirds of children ever return home. While ACS has made exemplary progress in keeping children at home through intensive preventive services in place of removal, most agencies and ACS itself have not focused on examining and establishing the practices that lead to safe, timely reunification. In this concept paper as well, ACS does not send a signal that its primary objective in foster care is to reunite families and that a primary goal in restructuring contracts is to better achieve reunification. Instead, “permanency” is the stated goal. Strategies that will lead children to be either returned home or placed for kin guardianship or adoption are mixed together and, seemingly, given equal weight. Under “targeted investment to improve outcomes,” only one out of five investments relates to reunification. If a difficult goal is not articulated and planned for, it is unlikely to be reached. It’s critical that ACS center reunification as its primary goal.

Likewise, ACS notes that it will seek to address disparities in foster care services and outcomes but does not acknowledge foster care as part of America’s long history of separating and punishing African-American families, Native-American families, immigrant families and poor families or transparently reckon with its role in continuing that legacy. ACS operates primarily in low-income communities of color impacted by historical trauma and marked by disinvestment in the public institutions, services, resources and legal protections that support family stability. Its public communication on foster care must acknowledge the need for a robust commitment to reunification and to maintaining family bonds for separated children whenever possible. Children impacted by child welfare are harmed not only by abuse and neglect but also by racism and injustice. A commitment to justice must be part of a true commitment to safety for children.

### Focus on Reunification

Through the experiences of parent contributors to Rise and in Rise’s direct work with both ACS and a number of foster care agencies, we have seen first-hand what it takes for agencies to excel at reunification compared to other providers. These agencies make an intensive investment in onboarding training, casework models (Solutions Based Casework or Sanctuary), supportive supervision, data systems and on-site resources for families, including Parenting Journey, Visit Coaching, mental health services, and the support of parent advocates, reunification coaches and peer support groups. In addition, we have learned from ACS’ data analysis that parents who are quickly engaged in attending visits, planning meetings and FTCs are more likely to reunify. Despite this, intensive outreach to parents early in the case is not the norm and most agencies do not provide the staff training and service array that make reunification more likely.

As ACS plans for contracting, we urge attention to the following:

1. Targeted Investment in Intake Practices: The concept paper references that ACS will work from Rise’s paper *Power and Partnership* but in the section on “Targeted Investments to Improve Outcomes,” it does not mention investment in practices that can strengthen agency efforts to inform and build relationships with parents early in the case. Investment in a continuum of

practices to connect with families within the first days and weeks of the case is critical. That connection cannot be an effort at engagement in the agency's plan for the family, with the compliance mindset that so often permeates child welfare involvement, but real commitment to working from the needs and solutions that parents identify for their families. In addition, provision of written information and peer support to parents during that time is part of success. Agencies must build strategies to orient and inform parents, reduce stress and shame, and begin to build relationships with parents immediately after family separation.

2. **Required Case Practice Model:** The concept paper for preventive required preventive agencies to choose one of three practice models, including Solution Based Casework, and set a goal that families' transition from foster care to preventive would be seamless. Requiring foster care agencies to adopt a practice model to fidelity would improve casework with parents, reduce the impact of caseworker turnover, and make it more likely that parents can communicate effectively when transitioning to preventive during reunification.
3. **Step-Down to Intensive Prevention:** While families are being diverted from separation through use of intensive preventive models, few families are enrolled in preventive after separation once basic safety has been stabilized. Providers and ACS should be familiarized with preventive models that can be used as a step-down to quickly return children in foster care to family, just as children are prepared to return to family from residential programs through preventive support.
4. **Trauma Treatment and Trauma-Informed Parenting:** In addition to training foster parents in trauma-informed parenting strategies, agencies must make this training available to parents so that parents can provide consistency for children during the transition home. Parents with foster care cases also should be able to access trauma-involved services contracted through preventive agencies and supported more often to access quality trauma treatment services in their communities.
5. **Prevention of Intergenerational Placement:** Young people in foster care who are expecting or parenting are at high risk for family separation. These parents should be offered comprehensive know-your-rights training delivered by peers and peer support by other young parents who have been in foster care.
6. **Inclusion of Parents in Youth Education and Treatment Planning:** This paper outlines strengthened supports for youth. Parents are frequently unaware that they can remain involved in their children's life decision-making and must be supported in maintaining the parent role while children are in foster care or residential care.
7. **Recruitment of Kin and Foster Parents Oriented to Reunification:** To reach its laudable goal of one kin/foster parent per family, agencies will need to invest in recruitment. Messaging in that recruitment must emphasize reunification and the foster parent's role of providing temporary assistance while families get on their feet. In addition, aggressive kin guardianship targets set early in the case (by 6 months) are, in some cases, moving children quickly out of the system in a way that reduces the likelihood of reunification. Kin guardians and parents must be fully informed that kin guardianship is associated with a lower likelihood of return home so that families can make informed decisions, regardless of agency permanency target goals.
8. **Enhanced Support for Trial Discharge:** Peer support during trial discharge can help parents identify trustworthy supports in their communities and strategies to cope with children impacted by the trauma of separation. Just as the Mockingbird model of peer coaching and respite has

proved effective for foster parents, parents need connections to be able to access peer support during trial discharge.

9. **Data:** Agency data systems provide little meaningful and accurate information that can help frontline staff track parents' contact with the agency, including visits. Investments in training about Family Time, especially, will have little impact without a data system that tracks visit attendance. ACS must advocate for replacement of Connections, support data workarounds and build agency competency to use data to strengthen practice.

### Parent Voice

The discussion about how to improve foster care and residential services shouldn't be a conversation solely between professionals, without meaningful family involvement. This conversation should be community-led. The ACS concept paper on preventive services required agencies to institute feedback methods such as surveys and roundtables so that parents have a voice in policy and practice and agencies can adjust their approaches to better serve their communities. This practice should not be limited to preventive agencies. Provider agencies should develop mechanisms to hear from foster care-involved parents—and from older youth—about their experiences and ideas for practice change, and work alongside parents to implement meaningful change. Parent advocates should be involved in designing and implementing feedback methods, analyzing results and making decisions about agency action steps. Inclusion of parent advocates in the design and impact of this work should be required or rewarded.

Parent voice also is an important part of designing and delivering training for frontline foster care and residential staff, and for foster parents, including kin caregivers. Parent voice in training too often becomes tokenism, but meaningful roles for parents—and youth—to design and deliver training can better sensitize frontline staff to working with families. ACS' onboarding training for foster care staff and training for foster parents, including MAPP and Building a Bridge, should include co-facilitation with impacted youth and parents.

### Meaningful Parent Advocacy Roles, Training and Support

The concept paper states that provider agencies will employ parent advocates to support and engage parents throughout the life of the case. We assume this means life-experienced parent advocates who themselves experienced family separation through foster care. We ask that in its contracting, ACS make that clear and include the following specifics:

- *Required ratios of parent advocates to parents served at the agencies.* Just as ideal ratios for caseworkers and supervisors are specified in the concept paper, ratios for the number of parents per parent advocate should be specified. Every foster care unit should include a parent advocate so they can bring their perspectives into unit meetings, serve families to expedite engagement and provide support throughout the case.
- *Consistent job descriptions for parent advocates.* Parent advocates report that they are frequently brought into cases late in the game, during crises. Their roles are not structured to meet parents at the beginning, facilitate peer support, or give them control or discretion in how they support parents. Data shows that engagement within the first few weeks of the case is critical to reunification; therefore, parent advocate roles must include a robust engagement function. A common job description outlining key competencies that can be supported through training can also strengthen the impact of advocates and make it easier to assess that impact. In addition, the parent advocate title should be protected, referencing life-experienced advocates.

### *Training and Supervision*

- *Training consistent with case planner training.* Parent advocates report that they are not always offered key trainings, such as training on safety and risk assessment, and that lack of training is then used to exclude or minimize their involvement in decision-making. Core training through the Workforce Institute in the same basics as case planners should be required.
- *Training and peer support in the advocate role.* The advocate role requires parent advocates to draw on their personal histories, heightening the likelihood of vicarious trauma, and to walk a fine line in representing the agency and advocating for parents within the agency. No training or ongoing peer support from other advocates outside of agencies is currently available for advocates in this difficult role. Through a concurrent contract with a TA provider, ACS should ensure that training and peer support be made available to potential and working advocates. Ideally, this training would build on successful programs for credible messengers in related fields and be made available to advocates in both preventive and foster care settings.
- *Supervisor training.* Given the delicate nature of the parent advocate role, supervisors should receive training specific to advocate supervision, and supervision should be frequent and developmental.

### *Leadership*

- *Advancement to leadership roles.* Few parent advocates now advance to supervisor or leadership roles within the agencies, despite long service, or are included in senior decision-making teams to ensure agency responsiveness to parents' needs. Agencies should be rewarded for advancement of parent advocates or, at a minimum, inclusion of parent advocates in policy and practice decision-making.

In closing, we want to add one more word about performance-based contracting. Among “permanency” outcomes, some agencies have better records on kin guardianship and adoption than on reunification. Performance-based contracting should prioritize reunification outcomes. Families deserve the best chance possible at emerging from foster care separation intact.

Sincerely,  
The Rise Staff