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**New York City
Administration for Children's Services
Racial Equity Participatory Action
Research & System Audit:
Findings and Opportunities**



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Introduction

Background

Galvanized by the Movement for Black Lives following the police murders of George Floyd and Breonna Taylor, New York City residents coalesced local social justice organizing efforts to call for divestment from carceral systems, generally, and to defund the NYPD, in particular. At the same time, the COVID-19 pandemic sharpened the focus of communities and organizers on the health and well-being of Black and Brown¹ families impacted by the virus. Black and Latinx folk are three times more likely to contract the virus, four times more likely to be hospitalized, and twice as likely to die from viral complications.² In September 2020, the collective angst and frustrations of Black and Brown foster care system-involved youth and young adults culminated in the March for Black Foster Youth and Children.

In response, political and public-sector leadership in New York responded to this focused attention on historical and structural racism by advancing racial equity discussions, agendas, and policies. To be sure direct action and racial justice organizing have harnessed constituents' power and amassed political capital, yet government pronouncements and policy accommodations regarding racial disproportionality have been viewed by some as efforts to both appease and deradicalize current racial liberation movements.³

The Project

It is against this backdrop that the National Innovation Service (NIS) developed a research project that centers lived experience as subject matter expertise and considers social conditioning⁴, in order to consider challenges to and opportunities for the New York

¹ Black as a racial or ethnic identity could include people who self-identified as African American, Caribbean, Caribbean American, and African. Brown as a racial or ethnic identity could include Latino/a/x, Dominican, Puerto Rican, and South Asian. Additionally, national child welfare datasets reference categories for race from HHS datasets have a category for Unknown/Unable to Determine, but the U.S. Census Bureau dataset does not. Likewise, all races exclude children of Hispanic origin, and children of Hispanic ethnicity may be any race.

²See Fouad, Ruffin and Vickers, 2020.

³ See Bartholet, 2009. See Hill, 2011. See also New York City Confronts Massive Overrepresentation of Black Children in Foster Care <https://imprintnews.org/featured/new-york-city-de-blasio-black-foster-care/33992> accessed 12/26/2200. See also Child Welfare Information Gateway, 2016.

⁴ Social conditioning is the process of training individuals in society to have certain beliefs, behaviors, desires, and emotional reactions, which are approved by the society in general or by certain groups within it. The concept is stronger than that of socialization, which is the process of inheriting norms, customs, and ideologies, and is particular in its sociological application to families and households (Parsons, 1959).

City Administration for Children's Services (ACS) to become an antiracist organization.⁵⁶⁷ NIS conducted our research through the *intersectional* lens of race, gender, and class to present generalizable themes that build from Black and Brown families' understanding of what it means to be safe and to thrive.

Since 2006, ACS has undertaken various efforts to address the systemic issues that contribute to racial disproportionality in the child welfare system and to change how the agency views race, ethnicity, culture, and sexual orientation in client services and staff relationships. These efforts have included agency-wide staff training, engaging a range of external consultants, and conducting internal reviews of racial equity practices and policies, led by the Racial Equity and Cultural Competence Committee. In 2019, the newly-formed Office of Equity Strategies produced an Equity Action Plan to provide a roadmap for the next stage of ACS's equity work, and Commissioner Hansell announced that ACS would take steps to become an antiracist organization.

In Spring 2020, ACS began discussions with NIS about enhancing the Equity Action Plan by systematically engaging Black and Brown communities and frontline ACS staff to understand their experiences, needs, and priorities related to racial equity. NIS began reaching out to parent advocates and other local and national child welfare organizers to develop the relationships necessary to conduct this work. Due to a COVID-19-related delay, NIS began formal research engagement with ACS and community partners in September, concluding the first phase in December 2020.

To better understand the breadth and depth of ACS child welfare practice and policy and identify opportunities for its antiracist development, NIS conducted a Racial Equity Participatory Action Research & System Audit, which involved reviewing internal and external policies related to racial equity, reviewing existing quantitative and qualitative data with racial and economic indicators, and conducting participatory research through presentations, focus groups, and interviews in which NIS worked closely with parents,

⁵ By comparison to traditional positivistic forms of qualitative research, we seek subjectivity and generalizability, within a racialized signal from research to highlight where and how people construct meaning. This orientation offers the ability to specifically examine geographic variation and builds into the aims of this project which seek to co-develop continuous rather than discrete metrics of how communities operationalize their constructions of safety and thriving.

⁶ See Stoltzfus 2017. Congressional Research Service.

⁷ As an entity of the State of New York Office of Children and Family services (OCFS), ACS derives its mandate from the federal authority in the Social Security Act, namely IV-B and IV-E. Nationally, child welfare programs are administered by the Children's Bureau, an agency within the Administration for Children and Families (ACF) in the U.S. Department of Health and Human Services (HHS). These statutory parameters are central to how NIS understands both ACS's constraints and its openness to transformational change.

parent advocates, frontline agency staff, agency leadership, and legal advocates. Specifically, NIS sought to understand the formal policy and practice of the agency; the needs, experiences, and priorities of different groups with respect to racial equity, economic precarity and safety; the challenges to implementing effective antiracist practice within the agency and the system more broadly; and the opportunities that people with lived experience of the system identified for systemic change.

System Transformation Framework: Decolonizing Child Welfare Practice by Dismantling Anti-Black Racism within Safety Culture and Science

The precarity of poverty, the persistence of structural racism, and gender roles in child rearing present both opportunities and challenges to applying principles and practice of safety science and the promotion of safety culture within US Child Protective Services Agencies.⁸ Within ACS, identifying the ways in which gender, race and class structures underpin people's lived experiences enables us to uncover previously ignored information, introduce knowledge of social interactions, and demonstrates how the structure of administrative knowledge within an organization supports and perpetuates a specific status quo.⁹

Since 2015, the mission of US Child Protective Services Agencies (CPSAs) supporting child and family safety has centered its practice on safety science assuming a "safety-critical enterprise" lens.¹⁰ Nationally, CPSAs have advanced safety cultures that strive to balance individual accountability with system accountability to value open communication, feedback, and continuous learning and improvement.¹¹ However, safety science practice

⁸ Historically, public welfare arrangements that buttress child welfare systems are initiated or expanded during cyclical periods of civil disorder, often accompanying mass unemployment, and then retracted when larger economic and political stability are restored (Fox-Piven and Cloward, 1993). Specifically, the 1965 Moynihan report, "The Negro Family: A Case for National Action," placed Black families, generally, and Black motherhood, in particular, within the crosshairs of punitive social and public policy (Hill-Collins, 1975). Taken this way, child welfare services were developed to align with social work institutional arrangements, in macro-practice, and historical police investigative processes, in micropractice, to reinforce patterns of order and conscript in would-be organizational change initiatives (Marx, 1971). All the while, a yawning gap in the national debate to consider the impact on foster care placements against the consideration of a child's multicultural (family) ethnic identity and needs remained outstanding. The fluidity and the lack of precision of race and the construction of race consciousness surrounding Black (and Brown) families further illuminated how the child welfare services, in general, and foster care placements, in particular, accounted for lapses and variances in measures and outcomes (Baptiste, 1983).

⁹ Abramovitz, 1996

¹⁰ Morton and McDonald, 2019

¹¹ Cull et. al, 2015

continues to assign blame around child safety and over-index on “risks of a critical incident.” This animates external surveillance and allegations that target and undermine Black and Brown families and staff safety and well-being, in general, and prioritize the safety and security of executive leadership, in particular.

NIS has focused its research on racial equity and on safety, which has required expanding the frame of “safety science” to focus on the agency’s broader stated goal of protecting and promoting child and family safety. Through our conversations with parents, staff, leadership, and advocates, we have found that there is a fundamental tension between how ACS defines and operationalizes safety and the agency’s goal of becoming an antiracist organization. While the practice of safety science seeks to provide opportunities for staff to engage in more honest conversation, it does not interrogate whether ACS is structurally creating *safety* for frontline staff and for families in its policies and practices. Given an organizational hierarchy that privileges white workers with senior leadership in central administration while Black and Brown employees predominate frontline workers, ACS safety culture primarily focuses on insulating protecting leadership and, secondarily, protecting staff from external pressures. Taken together, this approach serves to actively marginalize cultural constructions of safety and thriving from Black and Brown families with children, in general, and poor and Black mother-headed families, in particular.

In the findings of this phase, NIS explores challenges and opportunities that center on power dynamics and tensions between ACS’s current dual goals of safety and antiracist practice, in their current operational form. Going beyond diversity and inclusion strategies, NIS has centered equity for Black and Brown frontline staff as well as impacted Black and Brown families with children to understand their experiences, needs, and priorities with respect to both racial equity and safety. Through a racially explicit lens and class analysis, we evaluated ACS policy and practice to identify the internal and external drivers of racialized outcomes for families and scaffold a continuum of system-level opportunities for achieving racial equity for Black and Brown communities in New York City, in particular, and to contribute to national child welfare evidence-informed practice.

Project Process

NIS worked closely with parents, parent advocates, frontline agency staff, agency leadership, and legal advocates with lived experience navigating the NYC child welfare system to understand their experiences, needs, and priorities and identify key areas of

intervention to further and deepen the agency's racial equity work through driving system-level change.

Drawing on NIS's [research with Black and Brown communities on constructions of safety](#), this work considered executive leadership, internal agency policy and organizational structure, the role and daily operations of frontline workers, and the key function of investigation and protection. Moreover, this work centered the lived experiences of Black and Brown staff and families to specifically interrogate system challenges. In particular, this work engaged in a formative assessment of how the different groups understand safety and of how poverty indicators signal risk and drive the agency's cross-functional operations, with a racial equity lens.

This work focused on surfacing needs, priorities, and areas of intervention around three key input areas of exploration:

- Opportunities for continued and improved frontline staff and parent-driven service, program, and policy design and implementation;
- Opportunities for frontline staff and parent-driven data collection, metric development, and evaluation to evaluate ACS's anti-racist and safety commitments; and
- Opportunities for holding ACS accountable to its anti-racist and safety commitments and evolving needs and priorities.

Methods

Drawing from the practices of community-based participatory research and participatory design, NIS strives for a deep level of participation in our work. We invited stakeholders into our research and design processes, as a means of better understanding, meeting, and solving for their needs. We engaged with people through systematized empathy, seeking to describe and explain their environments and the meaning they make for themselves through their own language and understanding.

Moreover, we prioritize experiential knowledge and recognize lived experience as a form of expertise that should direct any effort to diagnose systemic challenges and identify opportunities for effective change. In particular, we have sought to center and raise up the expertise of the people who are most directly affected and most marginalized by ACS: the parents and the frontline staff. Those groups are rarely consulted in organizational decision-making, but have the most direct knowledge of how policies and processes are

being implemented and what that means for how families and staff experience the system.

Because we have prioritized the participation of people with lived experience of ACS in our research and been directed by their expertise, we have developed and iterated on our research throughout the process. Specifically, we engaged in the following overlapping methods of data collection:

- **Policy audit and analysis:** Reviewed and analyzed relevant agency policies, regulations, organizational structures, and existing equity assessments and projects to inform initial participatory interviews and focus groups, as well as to learn more about particular policies or practices that came up in those conversations.
- **Collaborative data review:** Reviewed and analyzed qualitative and quantitative data at ACS that speaks to racial disparities and family experiences at different points in the system, in collaboration with ACS leadership and staff, to inform initial participatory interviews and focus groups, as well as to understand what data ACS currently has around particular issues came up in those conversations.
- **Participatory research:** Conducted facilitated feedback sessions, focus groups, and interviews with parents, parent advocates, frontline Division of Child Protection (DCP) and FEC staff, and ACS leadership across divisions to identify needs, priorities, and areas of intervention. This research developed iteratively, so early feedback sessions, focus groups, and interviews helped shape the later conversations.

As described above, our initial policy audit and data review helped shape the specific questions we asked in our initial focus groups and interviews, which in turn brought up particular issues, policies, programs, and processes that we then requested materials around to inform our understanding.

Research Development

In this research, NIS has sought participation through partnership. We began our research exploration by working closely with ACS's Office of Equity Strategies (OES) to identify initial audit materials and make connections within the agency, presenting to and receiving feedback from Commissioner Hansell and other agency leadership, engaging

with the Division of Policy, Planning, and Management (PPM), and learning from ACS's Racial Equity and Cultural Competence Committee (RECCC) and Equity Action Plan Implementation team about the agency's historical work and current racial equity priorities.

Those conversations informed, and were informed by, our initial policy audit and data review, all of which helped us to identify a general research direction. Although we had initially discussed focusing our attention on preventive services work, we learned that the 2019 redesign of that work is currently being implemented. Moreover, we saw an opportunity to begin our research with ACS's protection work, as the work that employs the majority of ACS's direct frontline staff, that offers a clear representation of the divide between white agency leadership and Black and Brown division leadership and staff, and that most directly engages the operation of race and safety in work with families.

In addition, after an initial review of synthesized data, NIS began collaboration with ACS under memorandum of understanding (MOU) in order to review deidentified administrative data. We reasoned it was useful to appreciate if and how internal administrative structures produce sets of data, the degree to which said data results from mandatory registration, and if and how ACS workers have incentives to collect and report data accurately. Through partnership with PPM, NIS sought to appreciate any coverage gaps, in terms of people and events, and content errors, in terms of key characteristics, in ACS's administrative data.¹²

ACS's administrative data and racial equity assessments to date highlight a number of clear phenomena with respect to race. It is clear that eleven community districts with Black and Brown families with children who experience deep, intractable poverty have historically had and continue to have the highest rates of engagement with ACS. Moreover, when the focus of mandatory reporting, Black and Brown families with children were more likely than their white similarly situated counterparts to become the focus of an investigation. Once becoming the focus of an investigation, Black and Brown families proceeded to judicial actions and had worse ACS judicial outcomes than did their similarly situated white counterparts.

¹² In Phase Two, NIS will undertake statistical operations and analysis through a matching approach to identify and assess how well ACS data describes the NYC population it serves.

ACS's racial equity work has identified and begun to address some of the drivers of those racial inequities, through its external advocacy around legal policy and mandated reporting practice and through its internal focus on bias and family-informed decision-making. However, ACS has not conducted a systematic analysis of the *why* and *how* of those inequities, and therefore it does not have a systematic theory of change.

Having developed an understanding of that context through the policy audit, data review, and initial planning conversations, NIS's qualitative research aimed to support the development of a more systematic analysis of the internal and external drivers and structures of the racial inequities in the ACS system, grounded in the lived experiences of parents and frontline staff and further illuminated by advocates and ACS leadership.

To that end, we worked closely with parent advocates to shape initial focus group questions and advise on research direction, discussed social work and legal practices with advocates to develop more targeted questions, and drew on our first conversations with parents and advocates to direct our conversations with ACS frontline staff and leadership. Furthermore, we worked closely with DCP division and union leadership to shape staff focus group questions, draw from data on the eleven community districts to identify an initial geographic focus on Bronx South and Brooklyn West/Brooklyn East Zone D, and build off of work that division leadership has been promoting in support of their staff. In all of our conversations, our questions were directed at understanding how race and poverty function within the ACS system, and how that relates to ACS's policy and practice around safety and safety culture.

Limitations

NIS was not able to get as far in our quantitative analysis as we had originally planned. Given the aggregated nature of the ACS data we received, NIS was only able to make a cursory review of general data collection processes, which lacked specificity to this project. NIS was provided detailed analysis of current statistical operations that were compelling but tangentially related to this work. In addition, although NIS requested two years of the most current calendar year data and fiscal year data, respectively, ACS administrative data lacked categorical variables that would support analysis particular to socioeconomic indicators. NIS intends to return to these data and requests in the second phase of this research.

In addition, given limited time and capacity, NIS focused its research on protective services and was not able to speak to all groups of people engaged with ACS. In the

second phase of this research, we intend to build on what we have learned through conversations with protective services leadership and staff to identify areas of intersection and exploration with other divisions, contracted providers, and other stakeholders engaged in the Family Court, juvenile justice, and foster care systems. We also recognize that we did not reach non-English speaking parents and intend to expand our outreach in other languages.

Activities

The specific research activities we engaged in are as follows:

Data Type	Activities
Current ACS Quantitative Data	<p>Collaborative data review:</p> <ul style="list-style-type: none"> ● Race/Ethnicity and Path Through the Child Welfare System 2017-2019 reports ● Flash Reports (2020) ● Community District Indicators by Race-Ethnicity (2019) ● FAR/CARES 2018-2020 referral data ● ACS 2020 & 2021 budget overviews
Current ACS Qualitative Data	<p>Policy audit and analysis + collaborative data review:</p> <ul style="list-style-type: none"> ● Qualitative surveys: <ul style="list-style-type: none"> ○ Prevention Services Family Experience Report ○ Youth Experience Survey ○ Evaluation Study of the Administration for Children’s Services’ Family Enrichment Center Initiative ● Organizational structures/staffing data: <ul style="list-style-type: none"> ○ Agency and DCP organizational charts ○ Members and roles for OES, RECCC and its subcommittees, and the Equity Action Plan Implementation team ● Racial equity strategies and tools: <ul style="list-style-type: none"> ○ Equity Action Plan

	<ul style="list-style-type: none"> ○ RECCC Strategic Plan ○ Oversight—Racial Disparities in the Child Welfare System testimony to the NYC City Council ○ Strategies to Reduce Racially Disparate Outcomes in Child Welfare ○ Racial Equity Impact Assessment tool ○ Racial Equity Toolkit ○ Continuum on Becoming an Anti-Racist Multicultural Organization ● Programs and processes focused on equity: <ul style="list-style-type: none"> ○ Safety Science approach ○ ACS Prevention Services RFP ○ FAR/CARES program overviews ○ Family Enrichment Center (FEC) program overview ○ Community Partnership Program (CPP) RFP and program overview ○ Parents Supporting Parents program announcement ● Current and pending policies and guidance focused on equity: <ul style="list-style-type: none"> ○ Legal definitions and policy instruction from the New York State Office of Children and Family Services (OCFS) ○ Policy around the implementation of a “preponderance of evidence” standard for investigation determination ○ Policy around changes to around State Central Registry records ○ Heighted Oversight Protocol for Critical Cases ○ Non-Discrimination: Youth and Families policy guidance ○ Promoting a Safe and Respectful Environment for LGBTQ Youth and Their Families policy guidance
<p>New Qualitative Data</p>	<p>Participatory research:</p> <ul style="list-style-type: none"> ● Presentations, feedback sessions, and planning meetings: <ul style="list-style-type: none"> ○ OES weekly meetings

	<ul style="list-style-type: none"> ○ PPM data discussions ○ Commissioner in Residence (CIR) Cabinet presentation + feedback ○ Chiefs of Staff Cabinet presentation + feedback ○ RECCC full group presentation + feedback ○ RECCC smaller group follow-up discussion ○ Equity Action Plan implementation team presentation + feedback ○ DCP division leadership research planning meetings ○ Union leadership presentation + feedback ○ DCP borough leadership presentation + feedback ● Focus groups and interviews with 115 people: <ul style="list-style-type: none"> ○ 4 parent advocate focus groups ○ 3 parent focus groups ○ 8 parent and parent advocate interviews ○ 6 staff focus groups <ul style="list-style-type: none"> ■ FEC staff ■ Bronx South CPS (Regular & CARES) ■ Brooklyn West/Brooklyn East Zone D CPS (Regular & CARES) ■ Bronx South supervisors ■ Brooklyn West/Brooklyn East Zone D supervisors ■ Bronx South + Brooklyn West/Brooklyn East Zone D managers ○ 13 ACS leadership interviews ○ 1 interdisciplinary legal advocate focus group ○ 3 legal advocate interviews ● Question feedback and review: <ul style="list-style-type: none"> ○ Parent Advocacy Council family experience survey
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Findings + Opportunities

Through our qualitative research, NIS sought to understand how parents, parent advocates, and frontline staff understand *safety* and the ways in which race affects their experiences with ACS. In order to appreciate how race and racism show up in an

individual's experience with ACS, we explicitly recruited and spoke with people who identify as Black and/or Brown. We draw on their experience below, and anywhere we refer to parents, advocates, and staff, we are referring to Black and Brown parents, advocates, and staff.

Across all focus groups and interviews, participants were asked questions about their experiences and perceptions of ACS, how they define safety for families engaged with ACS, why they think racial inequities exist within the ACS system, and their ideas for opportunities to address them. The remainder of this report is structured around the opportunities identified by participants and the thematic findings that underlie those opportunities.

Illuminating what we found to be a fundamental tension between how ACS defines and operationalizes safety and the agency's goal of becoming an antiracist organization are three overall findings:

- **ACS disrupts the safety of Black and Brown families.** We first asked parent, advocate, and staff participants to define what safety looks like for families and then if ACS contributes to making families safe in those ways. While each group had slightly different understandings of safety, they all viewed ACS as a system that actively destabilizes Black and Brown families and makes them feel unsafe.

One clear finding from this line of questioning is that staff feel that the application of safety from an institutional level is inconsistent. This frequently means that staff, parents, and advocates are unclear about how decisions are being made and leaves the determination about what safety means to the individuals making decisions. In the context of this discretion, participants more clearly describe the ways in which racism hinders the safety of Black and Brown families.

- **Safety is a privilege of race.** Participants described ACS as a predatory system that specifically targets Black and Brown parents and applies a different level of scrutiny to them throughout their engagement with ACS. Staff and advocates pointed to the mandated reporting process as the first place where racial bias is evident, describing a dynamic where Black and Brown communities are disproportionately surveilled by staff who are providing social services (teachers, nurses, social workers, shelter staff). Once in the system, Black and Brown parents continue to receive more scrutiny than white parents. From the initiation of an

investigation through potential court proceedings and supervision, staff and advocates describe a system that gives preferential treatment to white parents. White parents are more likely than Black and Brown parents to seek legal counsel, receive favorable court judgements, and experience leniency with respect to removals and reunifications.

Participants described a system where race operates as an indicator of risk. When we asked participants why white families receive preferential treatment, many simply pointed to racism and pervasive anti-Black stereotypes about the abilities of Black and Brown parents to provide for their children. They also described how white parents are presumed to be innocent and are repeatedly given opportunities to fail and try again, while Black and Brown parents are treated at every juncture as if they are not competent parents capable of providing acceptable care to their children. In this way, white parents are presumed to pose less risk to their children and are thus more likely to be treated in ways that empower parents to create safety for themselves and their families. Black and Brown parents are generally presumed to be a risk to their children and are often stripped of their abilities to make decisions about their families.

- **Safety is a refuge of class.** The way that ACS views safety is clearly linked to class. Participants described how poverty is criminalized, as signs of poverty are often seen as indicators of neglect. Parents felt penalized for being poor, as investigatory processes sought to catalog the ways in which parents struggled to provide food, housing, and resources for their children, and frame it as neglect. In this way, parents felt that ACS's standards for what constitutes an appropriate level of care is normed around the attainment of middle class status and economic resources. Parents find themselves penalized for their poverty without being provided pathways towards economic stability and, in some cases, facing further economic precarity due to the loss of benefits or housing through child removal.

The structure for opportunities

In the following sections, we expand on these findings and surface the opportunities for transformation. Many of these opportunities stemmed directly from our conversations with staff, parents, and advocates, whose experience we're centering in this work. They are structured in a sequence that moves from short-term opportunities internal to ACS towards longer-term opportunities that would require ACS to advocate for change external to the agency. There is an outstanding need to work with ACS leadership,

parents, advocates, and staff to develop a theory of change for ACS that operationalizes its anti-racist intentions. These opportunities are meant to provide possible directions and scaffolding for the forthcoming strategic design and implementation process in the next phase of this work.

Reorient the system around family-defined safety and needs

Shorter-term & internal to ACS

Black and Brown parents, advocates, and staff experience a **system that actively destabilizes Black and Brown families and makes them feel unsafe**. Although some parents report having had caseworkers who tried their best to support them, more families experience ACS as a predatory agency that disrupts their lives, subjects them to extended surveillance, and undermines their parenting ability and confidence.

Parents say that they **do not feel safe to share their honest needs**. They fear the ways in which domestic violence, housing instability, and other struggles can lead to their losing their children, rather than their getting the help that they need. Parents also experience judgment from staff, based on their race, gender, poverty, and where they live, and feel that staff scrutinize their every move to find small things to use against them. This experience not only diminishes family voice in ACS's process but also serves to delegitimize parents as caretakers.

Black and Brown parents feel that **ACS's standard for an appropriate family is normed around being middle class and white and penalizes poverty and Blackness**. Both staff and parents acknowledge that ACS isn't positioned to provide services that sufficiently address the basic needs of families, especially their economic needs. Moreover, engaging with ACS can drive families into further economic precarity, through the loss of benefits, employment, or housing.

Parent and legal advocates also speak to how different a parent's experience is when they have information on what's happening to them during an investigation and know their legal rights. **How much and what information a parent has depends on the ACS worker and whether they happen to be connected with an advocate**, and parents have highly variable experiences. In addition, parents and advocates report significant barriers engaging actively in cases for non-English speaking parents.

ACS's power to remove a child is a power akin and second only to the (state sanctioned) power to take someone's life. The experience of an investigation, even when an allegation is ultimately determined to be unfounded, too often **traumatizes parents and children**. One staff member described it as the experience of being stopped and frisked for sixty days, and participants shared countless stories of reports filed on Black and Brown parents that were grounded in unfounded claims of neglect or risk of neglect.

Because ACS does not center the self-described needs and safety of families, it is not able to recognize their unsafety or trauma. Instead, the emotions that parents express during an investigation can then be used against them in a determination and court proceedings.

Drawing from a dignity-centered, trauma-informed approach, the below actions are directed at reorienting the system around family-defined safety and needs.

1. Start in equity through listening and thoroughly understanding what Black and Brown families need and want

The experiences and needs described above provide a foundation for understanding how families experience the system and what they say they need that ACS does not currently recognize or provide. However, ACS must recognize this as an **opportunity to hear more and more regularly from families** about the struggles they are facing, what support would be helpful to them, how investigations could better center their voice and needs, and how they understand what it means to be safe and to thrive.

The above description synthesizes what parents, advocates, and staff said when we asked the question **“What does safety mean to you?”** ACS should ground all of its efforts to become an anti-racist organization in an understanding of families' answers to that question, and build from there.

To begin with, parents and staff spoke about the need for an embedded feedback mechanism to **collect regular qualitative data from families, staff, and advocates on needs, experiences, and outcomes**, drawing on the conversations parent advocates regularly host and that NIS has facilitated. As part of that, a member of the ACS leadership team recommended that parents and other community stakeholders be funded to participate in regular focus groups,

feedback sessions, and other forums to both provide that qualitative data and inform policy and programmatic changes within the agency.

2. Establish metrics and collect data around family-defined measures of success

Once ACS begins to listen to families, there is an important **opportunity to design metrics that would evaluate family outcomes according to what they say they need, and identify what data would be necessary to collect in order to look at and evaluate long-term outcomes for families.**

Currently, ACS does not have the data or metrics to evaluate whether it is meeting its ultimate goal of promoting child and family safety. To begin with, it **does not track outcomes for families with respect to safety.** The recent surveys on foster care youth and family preventive service experiences provide useful information on point-in-time experiences. But beyond those surveys, ACS only tracks case interactions, progression, duration, and immediate outcomes (e.g. reunification or not). ACS can say how many parents it investigated or connected to services (inputs and outputs), but it cannot say whether it promoted child and family safety through those interventions (outcomes).

The **metrics that do exist do not promote safety.** Staff spoke about how their work is evaluated according to their ability to document cases and their number of interactions with families. As they described it, this incentivizes them to be invasive and not tell parents their rights, and is not focused on either their ability to conduct a full investigation or their ability to fully understand and support family needs.

Moreover, ACS is not currently collecting data that could represent specific family needs and whether they were met, or help explain more directly how race and poverty drive differences in outcomes for families. Most saliently, ACS **does not collect custodial parent socioeconomic data**, including data around housing instability and homelessness, employment status and earned income, immigration status, and education attainment. Having a more robust data-informed understanding of family needs and outcomes is especially important given the multi-generational cycle through ACS's system.

3. Prioritize primary prevention investments outside of the agency

As ACS establishes metrics and collects data around family-defined measures of success, there is an **opportunity to identify where and how ACS makes service investments that support Black and Brown families in achieving that success.**

People from all of the groups we spoke to emphasized the **importance of separating primary from secondary prevention.** They defined primary prevention as support for families who had no contact with ACS and secondary prevention as services provided to families once a case had been opened.

Parents and advocates discussed investment in **community-based services for families that they could access entirely independently of ACS,** including at organizations they already trusted. In particular, people highlighted the need for investments in housing, employment, and domestic violence support. Parents who'd been in foster care also stressed the need for housing programs that prioritized young people aging out of care, as well as programs that helped them navigate practical requirements of adult life. Fathers also discussed the need for parenting support programs that included them.

This, too, is connected to the need to identify and drive at successful outcomes as defined by families. Parents, advocates, and staff emphasized the importance of directing ACS's funding to supports that would **meet families' needs, support long-term family safety and well-being, and stop the multi-generational cycles of families** coming through the ACS system. That focus, however, conflicts with the agency's current metrics, which emphasize the number of service interactions over successful outcomes that would ultimately result in a decreased number of client interactions.

Essential to the investment in primary prevention is parents' express desire to have **accurate information about and choice in what services they seek.** Parents, advocates, and leadership spoke about the ways in which wealthier and white families have access to support that allows them to avoid or cut short ACS involvement. They call for access to similarly high-quality services for Black and Brown families, through both private and non-profit service providers.

4. Prioritize family-led program models within the agency

There is also an **opportunity to** apply the to-be-developed family-defined measures of success to **systematically integrate family goals into investigation processes and policies and hold staff accountable to implementation.**

Parents, staff, and leadership emphasized the importance of **prioritizing policies and processes within the agency that are designed around family needs**, although investment in primary prevention should result in fewer families being investigated.

Staff and leadership discussed the **progress that ACS has made in developing ways of working that gave families more of a voice in their cases**, including Family Team Conferencing and CARES.

However, both groups also talked about the ways in which ACS needs **a stronger process for families to highlight and staff to systematically consider family strengths as part of an investigation.** Frontline staff in particular spoke about the challenges of hierarchical decision-making for the staff working directly with families and the families themselves to truly have influence over decisions. Parents and advocates also highlighted the need for accountability for ACS staff and leadership around the implementation of existing family-centered policies.

Equip and support staff to deliver dignity-centered services

Shorter-term & internal to ACS

Parents, advocates, staff, and ACS leadership acknowledged that there is significant variance in the experiences that a family might have when engaged with ACS staff. Overwhelmingly, parents and advocates described staff as transactional, disorganized, unresponsive, and biased, contributing to negative experiences and outcomes. Through our conversations with staff and leadership, we heard them similarly describe internal conditions that prevented staff from understanding parents and supporting their needs. Staff of all levels point to the conditions of their work as highly stressful, due to the high number of caseloads, never-ending documentation requirements, and fear of retribution for making decisions that superiors might disagree with.

While ACS has taken actions to reduce the average caseloads of its staff, **many staff report that their caseloads are untenably high**. This problem is exacerbated by high turnover rates, which can significantly increase the number of cases assigned to a person. Staff frequently spoke about their inability to plan their days given the dynamic nature of casework and the frequent surprise additions to their caseloads, which are disorienting and prevent thoughtful and deliberate work. The impact of a high caseload is that staff simply don't have time to get to know a family, cannot be responsive to the needs of parents, and often are forced into transactional relationships and rushed decision-making by default.

Both staff and ACS leadership spoke to the unique challenges faced by DCP staff, **who face intense scrutiny to justify their work and protect themselves from retribution in the agency**. Staff described an internal culture that operates on fear and intimidation, where staff can easily find themselves in front of "a firing squad" being interrogated about their work on a case or reprimanded for not meeting their target metrics. **This dynamic produces incentives for staff that orients their work around protecting themselves from internal consequences rather than ensuring the safety of a family**. This frequently means that staff err on the side of safety for themselves, by seeking removal and thereby ensuring that they won't be liable in the case of abuse. Staff at all levels in the agency acknowledged that both internal and external pressures create a need to have a scapegoat when things go wrong in a case, which pushes internal departments and staff to limit their exposure to culpability at all costs. Staff frequently stated that this culture of fear incentivized the removal of children, positioning CPS staff as detectives looking for reasons to remove children, rather than as social workers aiming to support families.

Frontline staff and lower-level managers in DCP identified **a clear racial hierarchy within ACS, which means that Black and Brown staff don't have the power to have to inform policies and practices and voice their experiences of racism**. For staff, there was a clear delineation between the culture and racial makeup of "central office" and the borough offices. The central office was described as predominantly white, where staff rarely had direct service experience and often were hired from graduate school or adjacent social service systems. In contrast, borough offices were depicted as having majority Black and Brown staff who often reside in the communities they serve and were led by leaders with direct service experience at ACS. DCP staff described a dynamic where predominantly white leaders in the central office make policy for Black staff to carry out in the borough offices.

Staff described a serious disconnect between the realities of their work and the policies they were made to enforce and enact. They pointed to many policies and practices that they know to be harmful to parents, but are still responsible to enforce and uphold. For this reason, **staff feel complicit in the harm that ACS can cause Black and Brown families and no power within the agency to make changes that might benefit them**. This leads to feelings of deep disillusionment with the work itself and does active harm to staff who feel that they aren't set up to positively support parents.

Lastly, staff and advocates both spoke to the **lack of physical and psychological safety that frontline workers have in their roles**. Staff routinely experience instances of racialized verbal abuse from stakeholders across the system and don't have mechanisms to hold parties accountable. In cases involving domestic violence or late night house visits, many CPS staff cited feeling extremely unsafe. Given their contact with people experiencing mental illness and substance abuse disorders, many staff experience unpredictable outbursts and can easily find themselves in precarious situations.

Taken together, staff face countless challenges in their roles at ACS. They often feel unsupported, powerless, and unable to positively impact the families that they are meant to serve. The countless pressures that they face in their work and the limited tools they have at their disposal can contribute to deep disillusionment and lead to traumatic experiences in the field and at the office. While these factors negatively impact staff, they also impact the ability of staff to treat parents with empathy and dignity, or to meet their needs. The actions below will help address these issues.

1. Redesign investigation to be family-centered

Staff, advocates, and parents were clear that the investigation process is traumatic for all parties involved in it and a process that exacerbates racial inequities. Fundamentally, internal and external pressures drive staff to seek removal as a first course of action, to cover the reputation of staff, internally, and ACS, externally. This prevents parents, predominantly poor Black and Brown parents who don't have recourse to legal or other support, from getting a fair chance.

The purpose and structure of the investigation process needs to be redesigned to account for these inequities and biases and to reduce the traumas experienced by both staff and parents. Staff and advocates were deeply aligned in their desire to

contribute to the redesign of investigation and embed already existing models into the ways that CPS works.

For example, staff and advocates emphasized the importance of the CARES model, which prioritizes the development of deep relationships and produces a more holistic understanding of parents. **They want to extend CARES staff coaching to CPS staff to support them in engaging with parents in helpful ways.** They advocated that the CARES model be a starting point for the redesign of investigatory processes, as it could enable CPS staff to be social workers instead of detectives, reorienting their goals and metrics towards the development of understanding and provision of support, rather than finding evidence to support removal.

2. Invest in supports for staff to deliver empathetic and holistic services

ACS has already committed to reducing the average caseload of CPS staff, but needs to go further to ensure that staff aren't overburdened and can prioritize deeper forms of relationship building. While this could be interpreted as a need to invest in more staff, **ACS should consider the ways in which it can reduce the overall number of cases processed through CPS**, which is explored further in subsequent sections. A reduction in caseload should provide staff with the opportunity to commit more time and focused energy to understand and support the parents they work with.

Even with a reduced caseload, the experience of doing frontline work can still be challenging and traumatic. Staff want ACS to **recognize the trauma and stress that frontline staff experience on a daily basis and provide supports to address them.** Both staff and leadership suggested that ACS should invest in practices that might build psychological safety for staff, such as motivational interviewing, reflective practice, and training in de-escalation techniques. Advocates and parents were adamant that staff need explicit training on how to work with people experiencing substance use and mental health issues, as well as an appreciation for how to understand cultural differences in parenting style. The goal of these trainings would be to help ensure that ACS staff develop a deeper understanding of the parents they work with and be given the tools to provide empathetic support.

Additionally, staff expressed a desire for more explicit supports for staff who have experienced trauma and racism on the job, with a specific focus on how Black and Brown staff experience trauma in their work with Black and Brown parents.

3. Invest in equitable hiring and professional development practices

DCP staff outlined a hierarchy internal to ACS that didn't value the experiences of frontline workers, limiting their abilities to work in other divisions and move up in the ranks. Additionally, staff felt that those who "came up in ACS" were not as valued as leaders hired externally, who often had political affiliation or connections to funders. This contributed to a feeling that Black and Brown DCP staff have limited career possibilities at ACS and are relegated to staying within a particular role or level.

ACS should conduct an internal HR-focused equity assessment to determine how race, gender, and sexual orientation are represented across various levels across the organization. Additionally, ACS should ensure that their hiring and professional development practices are racially explicit and equitable, inclusive of the types of lived experience that ACS values. The intent of this work should be to ensure that Black and Brown staff who begin their careers in frontline positions have ample opportunity to progress internally and to leverage their understanding to improve the policies and practices of the agency.

4. Engage staff in policy-making to embed frontline expertise

Staff engaged in this research had a deep understanding of the ways in which numerous policies, practices, and services were misaligned with the realities of their roles and the needs of parents. There is an opportunity to develop more inclusive policy making processes that seek to incorporate the lived experiences of staff and advocates.

Given the high caseloads and stressful days that frontline staff face, staff should be given deliberate time to engage in policy development processes and low-touch ways to offer feedback on existing policies and processes.

A key factor in the ability for staff to contribute is their ability to feel safe and comfortable sharing information about what isn't working, without fear of

retribution. ACS might consider processes that protect anonymity and offer staff the ability to speak freely about the challenges that they face and their policy ideas.

Commit to accountability to families and staff

Medium-term & both internal and external to ACS

In part because it does not systematically ask and seek to understand family and staff needs, ACS lacks accountability to both Black and Brown families and staff.

Parents, advocates, staff, and leadership described the agency's **crisis-directed incentives that ultimately prioritize the protection of leadership and staff over the safety of Black and Brown families**. This results in an organizational structure that is more accountable to the interests of the media, City Council, Mayor's Office, and other external parties than it is to the needs of families and frontline staff.

Parent advocates and legal advocates asserted that **ACS's policies and legal standards are often supportive of families, but are not consistently followed, which denies families due process**.

Parents said they are **rarely given full information by staff about their legal rights, the process they have to go through once an investigation is opened, and what their options are** at the different stages of that process. This contributes to differences in how experiences and outcomes for Black and Brown families, as compared with white families with similar allegations. Because white families are more likely to have private attorneys and connections and know their rights, staff, advocates, and leadership report that they are often better able to navigate the process and get their cases closed quickly.

As a result, both **parent advocates and legal advocates see their essential role as holding ACS accountable to due process and sharing the information parents need** to be able to advocate for themselves and their children. Advocates support parents in demonstrating their strengths to combat what they see as ACS's negative view of parents, and to center parent self-determination and expertise in a process that largely leaves them out.

Parents and advocates also experience a disconnect between what ACS's leadership says about equity and its formal family-centered policies, and what staff are able to implement

given pressures from leadership and supervisors. Moreover, **legal advocates described ACS leadership as actively resistant to holding staff accountable to implementing policies, and said they often have to explain ACS's own policies to its staff.**

Given that the New York State legislation that raised the standard of proof necessary to substantiate allegations of child neglect or abuse from “some credible evidence” to “preponderance of evidence” will go into effect in January 2022, this is an ideal time to develop mechanisms for accountability to due process.

The below actions will help hold the agency accountable to existing legal standards and policies, as well as new policies and processes that center family and staff safety.

1. Support Miranda rights

Parents, parent advocates, legal advocates, staff, and individuals within ACS leadership all agreed that one of the most immediate opportunities to hold ACS accountable is to **support legislation that would establish “Miranda rights” for parents in the child welfare system.**

Parents and advocates said that if staff were required to tell all parents their legal rights at the beginning of their first interaction, more parents would feel agency in an investigation and therefore would be **more likely to express their needs honestly and share information that could help explain their situation.**

Parents and advocates see ACS's active resistance to both Miranda rights bills and the early legal representation proposed below as a clear sign of its racism. **For ACS to become an anti-racist organization in practice, it is essential that all parents have the same information up front.** Starting from the first knock on the door, Black and Brown families need information to make their own choices about how to engage with ACS in the ways that are best for them and their children.

2. Invest in early representation and parent advocacy

While parents need to know their rights regardless of whether they have a lawyer, parents, parent advocates, and legal advocates also spoke to the opportunity in

and [demonstrated](#) **benefit of early interdisciplinary representation**, where parents work with a team that includes an attorney, social worker, and parent advocate. Although some parents do get connected to interdisciplinary representation after they've been engaged with ACS, advocates see a need for the largely Black and Brown parents who don't have access to private lawyers to be connected to them at or before their first interaction with ACS.

Parents and parent advocates described the importance of having someone who can **model for parents how and where to advocate for themselves**. Legal advocates discussed the **legal standards and policies that ACS does not systematically adhere to without an advocate there to hold staff accountable**.

For example, while **"imminent risk of harm" is a robust legal standard**, advocates report that staff are not incentivized or supported to develop sufficient evidence to meet that standard, and that the agency has developed no systematic check on that. They also spoke about the need for additional work to ensure that ACS upholds its **legal responsibility to consider removal "as a last resort" and make "reasonable efforts" to keep families together**.

ACS has funded parent advocates at preventive services organizations and is in the process of hiring parent advocates at foster care agencies, which many parents and parent advocates think is an important step. However, many also spoke about the **importance of funding parent advocates outside of the agency**, at interdisciplinary legal advocacy organizations or even at a dedicated parent advocate organization run separately from ACS's contracted providers, because they see the role of advocates as misaligned with ACS.

3. Transparently share information and data around decision-making.

For parents to advocate for themselves and advocates to support parents in that effort, they say they **need to have clear information about who is making decisions about cases and the rationale for those decisions**. As discussed, ACS's hierarchical decision-making process can mean that the staff working directly with families are not the staff making the ultimate case decisions, but who is making the decision in any given case is not shared with parents or advocates. In addition, ACS's oversight processes can often make decision-making processes

less transparent to parents, as they cause decisions to become more removed from frontline staff.

In addition, staff, leadership, and advocates also spoke about the need for ACS to **regularly collect and distribute data on race, poverty, and decision points around services and determinations**. They emphasized the need for data to be shared with staff beyond the central office and with the public, in order to support analysis of ACS's decision-making processes and the role of racial and anti-poverty biases.

Move away from poverty-as-neglect and focus on abuse by centering family-defined safety

Long-term & internal and external to ACS

Parents and advocates described ACS engagement as often **detrimental to Black and Brown family safety with lasting consequences on a family's ability to function, perpetuating multi-generational cycles of poverty and trauma**. As detailed above, parents and parent advocates described the ways in which investigations make parents doubt their abilities as parents, traumatize children who are questioned and/or removed, and disrupt economic and housing benefits. Parents also spoke about ACS as standing in the way of their ability to thrive, because it disrupted their lives and affected their ability to get work and access resources.

To explain why ACS makes so many Black and Brown families feel less safe, parents, advocates, staff, and ACS leadership all identified the connection of neglect to poverty. Black and Brown families disproportionately experience poverty in New York City, and people from all groups recognized the ways in which **the system penalizes families for their economic conditions** and detailed how "child neglect" and "imminent risk of harm" are defined and operationalized in ways that criminalize poverty.

Specifically, ACS staff and leadership spoke about how the **"minimum degree of care" standard for neglect does not take poverty into account and how subjective the process can be for determining neglect**. Parents and advocates experience ACS's standards for safety as a big gray area and highly variable, leaving it open to the discretion of the staff on the case. Parents and advocates especially emphasized homelessness and unstable housing, limited money to purchase food, and lack of access to stable medical care as crucial areas where parents needed to be supported rather than

have their children taken away for “neglect.” Staff also highlighted how many child removals result from mundane non-compliance with court orders for services.

Although some parents reported having been connected to ACS preventive services that were helpful to them, many parents and advocates described how Black and Brown families often only get access to services that might help them meet their basic needs when they are already in crisis and their needs have intensified.

As one advocate described it, the ACS neither addresses poverty nor gives poor people the right to be left alone. In order to address the way the intersection of race and poverty fuels the system, ACS should systematically parse poverty from neglect and imminent risk through a racial equity lens, by taking the below actions.

1. Redefine safety in terms of what families say they need

Parents, advocates, staff, and members of ACS leadership all emphasized the importance of **starting from an understanding of what families say they need to be safe**. As one advocate put it, ACS needs to zoom out from its current operations and say: “What do families need to be safe and healthy?” With respect to investigation, that would mean **reframing ACS’s legal obligation to investigate an allegation in terms of working *with* a family to find out what they need** and what actually happened and didn’t happen.

When asked what safety looks like for their family or the families they work with, parents and parent advocates spoke about the importance of **understanding child safety in the context of family safety**. For families, they said, safety is the ability to grow together as a family in ways that allow parents to develop their abilities as parents, and requires having a trusted support system where families can get their needs met.

For parents, **trust is grounded in their ability to share their experiences and struggles honestly**, in order to get the support that they need. That requires feeling that they will not be judged and penalized for their race, gender, or age, or for their experience of poverty, homelessness, precarious employment, lack of higher education, mental health issues, or domestic violence. It also means having people who listen to and understand a parent’s current situation, rather

than jumping to conclusions based on a snap judgment or something from the past.

According to staff and advocates, in the context of an investigation process, that would require ACS to develop standards for safety that aren't normed on white middle class families. In addition, members of ACS leadership spoke about the need to **integrate an up-front needs assessment and evidence-based investigation and conferencing practices that enable parents to demonstrate protective factors** as a standard part of the process. In humanizing parents and understanding what they need to feel safe, ACS could support the building of family power, which would in turn help break the multigenerational cycle of families through the system.

2. End removals for poverty and focus on abuse

Connected to the implementation of family-defined understandings of safety, staff, advocates, and members of ACS leadership spoke about the need for ACS to **focus its attention on abuse cases**. As part of that, they recommended that ACS **reevaluate when to file court cases for neglect, when child removal should be considered as an option in neglect cases**, and even whether removal should be on the table for neglect at all. Advocates and staff also spoke about the ways in which ACS's engagement with so many families where the indicators of neglect were simply indicators of poverty took away from its ability to identify and address situations of intentional parental neglect and abuse of children.

Members of ACS leadership stressed the importance of institutionalizing an approach of "first do no harm" or "do the least harm possible," emphasizing how great a power it is to be able to take kids away from their parents. They spoke about the harm that removals and foster care experiences create for both children and parents, and the ways in which that trauma can ultimately be destabilizing for families over the long term. Parents, too, described the abuse and mistreatment their children had experienced in foster care, and the ways in which they continued to be fearful, unconfident, and traumatized even after reunification. Drawing on those experiences, leadership and advocates attested to the need for ACS to **operationalize a recognition and cost analysis of the harm of removals into how it does its work**, at every stage of the investigation process.

To reduce its volume of neglect cases, ACS would need to **advocate the New York State legislature to more specifically and tightly define the legal standards for neglect and for what constitutes an imminent risk of harm and meets the threshold for removal**, in ways that did not penalize poverty and that accounted for the harm created by removal. Specifically, advocates and ACS leadership argued that the law and related agency guidance should more clearly lay out the circumstances under which the “draconian measure of child removal” is justified. They also recommended that ACS develop decision-making tools around removals and reunification that would help to focus current investigations on extreme neglect and abuse, and that could be updated as the law and policy changed.

3. Reform mandatory reporting through an antiracist lens

For the redefinition of safety and legal standards for neglect to fully contribute to significant reduction in the flow of neglect cases into the system, ACS also needs to **build on the work that it has begun around mandated reporting with a more explicitly antiracist approach**. Participants cited mandated reporting as one of the most significant drivers of racial disparities within the system. Staff and advocates provided dozens of examples of cases where staff of other agencies filed reports without substantiating their claims or speaking with the parents. Furthermore, ACS staff frequently encounter cases where mandated reporters file reports that describe conditions indicating poverty but not neglect. The lionshare of examples that staff discussed were from the Department of Education, where DOE staff frequently file reports based on the cleanliness of a child’s clothing or whether they bring food to school. ACS staff expressed deep frustration with mandated reporting, given that the majority of upstream agencies are able to extend services that would assist families who are in need, but instead report a case to ACS who isn’t positioned to provide those economic services.

ACS has done substantial work to recognize the role of mandated reporting in driving racial disparities within the system, educate mandated reporters within City agencies to address bias and misinformation, and support changes to State Central Registry screening and registration procedures. As part of the effort to advocate for and implement redefined and clearer standards, ACS should also work with City partners to address the ways in which surveillance of poor Black and Brown

communities drives reporting and to communicate the system's refocused priorities to City agencies and the public. This work needs to explicitly emphasize the role that other agencies have to extend the resources that they have available to families before reporting them.

Towards a Future State of ACS

The findings and opportunities outlined above begin *the work* to make ACS an antiracist organization that supports Black and Brown staff and families with children in the shorter term, while also building toward a longer-term decrease in the number of poor Black and Brown families who are investigated by ACS. This necessarily means ameliorating the disparate impacts experience Black and Brown families once they enter ACS. A decrease in cases, and especially neglect cases, will provide ACS with an opportunity to reconsider the direction and scope of its investments in families.

Even if ACS is able to advocate for and implement a redefinition of neglect that takes poverty into account, ACS will continue to engage with families whose struggles and crises are connected to their experience of poverty, and many of the families that no longer have contact with ACS will continue to experience poverty in ways that make them unsafe.

What role, then, should ACS play in addressing poverty? While most people we spoke with do not think that ACS is well-placed to address the racialized and gendered root causes of poverty for families in NYC, some advocates, leadership, and staff do see an important opportunity for ACS to engage in external-facing, cross-agency work directed at disrupting poverty.

Moreover, as part of the discussion of primary prevention investments, parents, advocates, and staff all spoke about the prospect of redirecting funding from ACS into quality housing, education, and other primary supports that wealthier families already have. As one ACS leader put it, ACS should think about change not always in terms of "adding something on" to the agency, but also in terms of "taking something away." And many parents and advocates promoted the active defunding of ACS as a means to dismantle, rather than "tinker" with or reform, a harmful and carceral system.

The opportunities outlined in this document surface higher-order strategy questions about the future of ACS: What does an anti-racist organization look like? What role should ACS play in addressing poverty? What more equitable future state are we arcing towards?

As we move forward in this partnership, NIS recommends that we work with ACS leadership, staff, advocates and parents to generate a vision for the future state of ACS and develop a targeted theory of change -- to prioritize, direct, and further develop the opportunities laid out in this report. It is our hope that through the next phase of work, NIS can bring frontline staff, parents, and advocates into deeper partnership with ACS leadership to design a more equitable path forward.