



New York Public Welfare Association, Inc.

Founded in 1869

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Sheila Harrigan, *Executive Director*

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November 4, 2022

Sheila J. Poole
Commissioner
NYS Office of Children and Family Services
52 Washington Street
Rensselaer, New York 12144

Dear Commissioner Poole:

Thank you for your leadership on OCFS policies and for bringing OMH, OPWDD and OASAS to the table at the commissioners' convening in October. At our NYPWA meeting yesterday, the local commissioners discussed what more would be helpful to them. We identified three issues: cross-systems, streamlining plan requirements, and workforce.

1. If we were to convey one message to all the agencies, it would be the urgency of the complex needs of children who are not able to access services including placement when needed. The cross-systems issues continue to lead to children staying overnight in county office buildings, extended stays in hospitals when issues are not medical, failed foster care including relatives' placements, adults living for long periods in a temporary shelter, and children and adults ultimately ending up in the criminal justice system – all because they cannot obtain the help they desperately need. We are encouraged by all proposals that would blend state agency resources, licensing, and regulations to address these needs and by OCFS taking the lead in collaborations with the other State Commissioners and with provider agencies that wish to pursue innovative programs. We have also sent follow-up letters to OMH and OPWDD. Your extensive experience, wisdom and willingness to take on the cross-systems issues is greatly appreciated.

2. Let's streamline administrative planning requirements. We know you heard us on this issue and are having your staff look into how OCFS might help. We recommend limiting requirements to submit and update plans to the bare essentials. Let the local districts simply check mark that there are no changes to a plan or add a note on what did change. Keep the OCFS plan requirements stable without updating them each year. Let commissioners know upfront in the plan guidance what is truly required of them so that there is not so much back and forth with revisions. The current process has diminished any potential usefulness that plans might have on a local level. Staff need to spend their time helping families.

3. Caseworkers and supervisors must be available in order to achieve child safety and permanency, as well as to offer adult protective services. The staffing situation is bleak. We appreciated the robust discussion at the meeting and your relentless support in speeding up the pace of action. We need to keep all the options on the table. It will take multiple strategies to make a difference including competitive Training & Experience exams and a host of other suggestions that were identified and are currently being reviewed or pursued.

Your leadership is an inspiration and the local commissioners offer you their support and expertise as policies emerge.

Sincerely:

Sheila Harrigan
Executive Director

Cc: Eileen Tiberio, NYPWA President/
Commissioner, Ontario County DSS