



Advocates for Children of New York

Protecting every child's right to learn

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Re: Comments Regarding Proposed Amendments to Chancellor's Regulations A-210 and A-750

Advocates for Children of New York (AFC) appreciates the opportunity to submit comments on the proposed changes to Chancellor's Regulations A-210, A-750, and the accompanying Tiered Response Protocol. For more than 40 years, AFC has worked to ensure a high-quality education for New York City students who face barriers to academic success, focusing on students from low-income backgrounds. Since 2001, AFC's Project Achieve has advocated for educational opportunities for students involved with the child welfare system, and each year, we collaborate closely with case planners and birth and foster parents to advocate on behalf of hundreds of students in or at-risk for placement in foster care. As such, we are well positioned to comment on the proposed amendments.

We recognize the need to protect all students in New York City and appreciate the efforts of the Administration for Children's Services (ACS) and the Department of Education (DOE) to share information about and monitor the progress of students with child welfare involvement. At the same time, we must keep in mind that in the vast majority of circumstances, the needs and interests of children align with the interests of their parents, and that increased ACS involvement can have serious, sometimes life-long impacts on families. Furthermore, words matter, and it's important that we all choose our words carefully, especially when talking about students and their families who already may be vulnerable to stereotyping. Some of the language included in the Tiered Response Protocol and the proposed changes to the Regulations may have the opposite of its intended effect, stigmatizing children and families rather than emphasizing the need for support and understanding. We are most concerned about referring to students with child welfare involvement as "ACS-involved students," with conflating abuse and neglect when discussing reporting

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requirements and abuse and neglect prevention, and with the continued use of the word “abuse” throughout the regulations, rather than viewing the subject through the broader prism of child welfare. We provide our comments in more detail below.

TIERED RESPONSE PROTOCOL

Introduction

The Memorandum included with Chancellor’s Regulations A-210 and A-750, entitled “Joint Statement Introducing a Tiered Response Protocol for High-Risk Cases of Educational Neglect and Unexplained Absence,” describes extensive monitoring and reporting requirements for school staff with respect to students with current or recent child welfare involvement. The name itself is misleading, since many of the students covered by the protocol are neither “high-risk” nor experiencing educational neglect; therefore, **we recommend the title “Tiered Response Protocol for Cases of Unexplained Absence” instead.**

In order to trigger heightened scrutiny under the protocol, certain categories of students only need to have one unexplained absence, which cannot rise to the definition of educational neglect under any interpretation of the law. Even three consecutive unexplained absences, which could easily result from an illness, family trip, or transportation issue that goes unreported by the parent, are insufficient, as a matter of law, to rise to educational neglect. Furthermore, many of the students covered by the protocol cannot plausibly be deemed “high-risk.” For example, all students whose families have an open ACS investigation are included in the protocol, and over the last four years, over 60% of investigations by ACS came back unfounded, meaning there was no credible evidence that abuse or neglect had occurred. The recommended title more accurately and appropriately describes the students and families whom the protocol is meant to serve.

In summarizing the protocol, the memorandum states that school staff will have access to “up-to-date child protective information regarding students in their schools who are, or recently were, named in a State Central Register (SCR) report of suspected maltreatment made by DOE personnel.” This statement is inaccurate; ACS will supply DOE with names of students whose *parents* are, or recently were, named in an SCR report. The report could concern another child in the family, including an older sibling or adolescent whose relationship with or behavior toward the parent may have little to do with the safety of the younger child. It is important that schools understand this distinction. Therefore, **we recommend that the protocol is amended to “regarding students in their schools whose parents are, or recently were....”**



Information Sharing and DOE Field Support Center Roles – Section 1

The protocol refers to students who are the subject of the memorandum as “child welfare-involved students.” While this designation is certainly preferable to “ACS-involved students,” which is the language used in the proposed changes to the Chancellor’s Regulations, people first language, which emphasizes the primacy of the individual rather than defining a person as his or her condition – in this case, a “systems-involved” child – would suggest using the term “students with child welfare involvement” instead. Research and our years of experience show that students with child welfare involvement are often stereotyped and subjected to disparate treatment in schools. For example, when students in foster care are forced to transfer schools mid-year, or return to school from residential treatment or hospital stays, assigned schools frequently resist enrolling them, often forcing students, case planners and families to return to the Family Welcome Center multiple times before the student can eventually enroll in school. In addition, students in foster care, and students with child welfare involvement generally, are much more likely to be classified as “Emotionally Disturbed” and to be placed in segregated special education settings than other students with disabilities; they are also more likely to be subject to out-of-school disciplinary action. Given these disparities, we strongly recommend that the language throughout this protocol, and Chancellor’s Regulations A-210 and A-750, emphasize the strengths of students with child welfare involvement, respect the strengths of their families, and focus on their welfare, rather than any perceived deficits in the children or their families that in many cases do not reflect the child’s reality. As such, **we recommend using the phrase, “students with child welfare involvement” wherever “child-welfare involved students” or “ACS-involved students” appears in the Tiered Protocol or proposed Regulations.**

Similarly, we are concerned about language in the protocol referring to the responsible staff member at the Field Support Center (FSC) as the “child abuse and neglect point.” A-750 gives the Deputy Directors for Student Services at each FSC responsibility for disseminating data about students with child welfare involvement to schools, so the protocol should refer to the Deputy Directors, not to abuse and neglect points. **If the protocol is to refer to an FSC “point,” we recommend changing the name to “child welfare point,”** as it focuses on the student’s needs and is more accurate. Most children whose parents have open ACS investigations have not experienced abuse or neglect, as the majority of cases are closed without further action because there were no indications of abuse or neglect. Also, students may be voluntarily placed in foster care absent abuse or neglect allegations, or enter because their parent is ill or deceased. Using the term “abuse and neglect point” inaccurately paints all students with child welfare involvement as victims of abuse or neglect, further stigmatizing this group of students and their families.



The Tiers – Section 2

This section of the protocol needs to clarify that students only fall into Tier 1, 2 or 3 after an attendance-related triggering event – that is, after students in any of the categories are discharged from their present school, after students in the first category have one unexplained absence, or after students in the second or third categories have three consecutive unexplained absences. The protocol and implementing Regulations must be explicit that, until one of these triggering events takes place, schools must monitor the attendance of students who are identified by the FSC as having child welfare involvement but are otherwise not responsible for subjecting the students and their families to heightened scrutiny and further ACS involvement. This distinction is especially important for students in Tier 2, whose previous ACS case has been closed. While we recognize the need to ensure the safety of these students, we also have concerns about subjecting families to further ACS involvement without justification. Section 3 of the protocol seems to indicate that schools should be documenting phone calls and notifying ACS after the child’s first absence, which contradicts the requirements set forth here.

The protocol should also make clear that students identified for the three Tiers based on discharge to a new school should be removed from increased scrutiny once the sending school confirms their enrollment and attendance in a new school. Their new school will then become responsible for monitoring the students’ daily attendance and placing them back into their respective tier only if the students subsequently have unexplained absences. This is particularly important for students in Tier 1 on Court-ordered supervision following a parole to their parent from foster care, and for students in Tier 3 in foster care who are on trial discharge with their birth parents or other relatives. Students who are reunified with their families often change schools immediately upon their return home. These students should not be included in the “tiers” once their previous schools confirm their reenrollment. Parents in these circumstances are under enormous stress, and subjecting them to additional scrutiny without the justification of unexplained absences may cause more stress and lead to failed reunifications, rather than providing the support and safety monitoring intended by the protocol.

School Review, Assessment, Outreach, and Notification Protocols – Section 3

School Review and Assessment – III.A

As discussed above, parts A.iii and A.iv of this section should make clear that these additional responsibilities only apply after a student with child welfare involvement experiences a triggering attendance event that qualifies them for Tier 1, 2 or 3, rather than applying to all students identified by the FSC as having child welfare involvement.



In addition, we are concerned that parts A.i and A.ii of this section reference the use of “child welfare indicators” in ATS to generate attendance reports, rather than the lists of students received from the FSC. In our experience, child welfare information in ATS is almost never correct. It frequently fails to mention that children are in foster care, and once it does, the screen is rarely changed. We have encountered situations when parents were questioned or worse by school staff because ATS indicated that there was an order of protection against them, when that order was long expired, or the wrong parent’s name was listed in ATS (including foster parents from many previous placements ago). Relying on ATS for this information, unless the Deputy Director for Student Services is explicitly responsible for entering and updating it on a monthly basis, is extremely problematic. Even if Deputy Directors are tasked with this responsibility, the ACS/DOE data match, disaggregated into categories by ACS and disseminated on a monthly basis to schools, will be far more accurate and should be the only document used to identify and categorize students.

School Outreach – III.B

Once again, Part B should make clear that these reporting and recording requirements, and subsequent escalation to ACS, should only take place following a school discharge without confirmation of subsequent re-enrollment or the required number of unexplained absences, and not at the time of the child’s first absence, as Parts III.B.i and III.B.ii seem to indicate. We suggest the following language:

- i. On the first absence, following a school discharge or unexplained absence of a child-student in Tier 1, the Attendance Coordinator...
- ii. On the first absence, following a school discharge or three (3) consecutive unexplained absences of a child-student in Tier 2 or 3, the school’s appointed...

As an aside, it is unclear why the attendance Coordinator is assigned to make phone calls for students in Tier 1, when Part III.A.iii requires schools to assign Success Mentors to students in all three Tiers.

In general, we support the recommendation that schools refer families for voluntary preventive services, particularly without further involving ACS, where medical, special education, or transportation issues may be impacting a student’s attendance. We suggest that there are many other factors, such as childcare, housing, and financial hardship, which may impact attendance and might also be addressed through a preventive referral. However, for students in Tiers 1 and 3, who already have an active ACS case, are subject to court supervision, or are in foster care, it is the responsibility of the person with case planning responsibility – the Child Protective Specialist or foster care case planner – to make those referrals. In many cases, that



person may already have referred the family to a program, or the family may be engaging in services that conflict with the resources the school is suggesting. Families with closed ACS cases also may be engaging in preventive services, as a result of their former case. Furthermore, when students are on trial discharge from foster care, it is not uncommon for the foster care agency to refer parents to preventive services within their own agency, and many parents prefer receiving services from an agency they are already familiar with. Therefore, **the protocol should make clear that schools should work closely with families when contemplating these referrals**, so as not to duplicate services that are already in place or conflict with previously developed service plans.

We are concerned that this section requires school staff to contact ACS whenever they report a case to the State Central Register (SCR). This seems duplicative and unnecessary, since a) the SCR will immediately notify ACS of any new reports or supplementary information to existing reports and b) as the protocol states, ACS cannot conduct a new Child Protective investigation unless the SCR accepts a call and refers it to ACS. Particularly in Tier 2 cases, when the prior ACS case has been closed, we are concerned about schools sharing information with and involving ACS in situations where the SCR has not accepted the case to refer it for investigation because the SCR has already determined that the school's concerns, if assumed to be true, do not rise to the level of abuse or neglect. While it may often be helpful to notify the ACS, foster care or preventive case planner who is currently working with the family in these instances, there seems to be limited utility in reaching out to ACS's Office of Education Support and Policy Planning, especially since the protocol already encourages schools to reach out to ACS or the FSC for assistance in referring families to preventive services or other interventions when the student's safety is not at imminent risk, but other factors are present that may indicate a need for supportive services. Furthermore, disclosing attendance or other educational records to ACS in these circumstances, when there is no active ACS case, may violate the confidentiality provisions in the Family Educational Rights and Privacy Act (FERPA), as the SCR's determination on its face seems to indicate that the "health and safety" exception to FERPA's disclosure rules has not been met.

Guidance for ACS and ACS Provider Agency staff – III.E

In general, the requirements and guidance for child welfare staff responding to escalations from school personnel seem appropriate to protect students and help families improve children's attendance. We are concerned, however, about the emphasis on calling in new cases for students in Tier 2, particularly when preventive services are not in place for families. In Part E.iii.b, the protocol requires ACS staff to discuss with schools the "feasibility of calling in their concerns to the SCR, and will also provide guidance on the types of information that are most valuable for such



a call (such as the fact that the family has a recent prior substantiated ACS case).” This response in the first instance seems extreme to address what may be no more than three or four unexplained school absences. **We recommend reversing the order of actions in the paragraph and discussing with schools the possibility of a referral to preventive services first, mentioning a call to the SCR only when the school has reason to suspect abuse or neglect.**

For students in Tier 3, Part E.iv does not take into account circumstances when a child is still in foster care but on trial discharge with his or her birth parent or other relatives. We recommend modifying the language to read:

...the foster care case planner shall:

- a. Contact the student’s foster parent⁴, birth parent, facility staff member or other caregiver.
- b. If phone contact is unsuccessful or the ~~foster parent’s~~ caregiver’s reason for the student’s absences from school is not satisfactory, the foster care case planner must...
- c. ...
- d. As necessary, the foster care case planner shall schedule a meeting with the school and caregiver to discuss related concerns...

CHANCELLOR’S REGULATION A-210: MINIMUM STANDARDS FOR ATTENDANCE PROGRAMS

MINIMUM ATTENDANCE PROGRAM STANDARDS FOR SCHOOLS – SECTION 3

Monitoring the Attendance of Students Involved with the Administration for Children’s Services (ACS) – III.D

As discussed above, in view of the importance of language, including using “people first” language to describe vulnerable student populations, **we recommend changing the title of this section to read, “Monitoring the Attendance of Students Involved with the ~~Administration for Children’s Services (ACS)~~ Child Welfare System.”**

We further recommend modifying the language in this section to say, “DOE students in foster care and DOE students whose parents are or recently were under investigation by ACS the Administration for Children’s Services as a result of a report of suspected neglect or abuse made by DOE personnel to SCR are referred to as ~~ACS involved~~ students involved with the child welfare system. Schools must monitor the daily attendance of ~~their ACS involved~~ these students...in accordance with Section III of Chancellor’s Regulation A-750 and the Joint Statement



Introducing a Tiered Response Protocol for ~~High-Risk Cases of Educational Neglect and Unexplained Absence~~ (“Tiered Response Protocol”).

Parent Outreach – III.G

We support the requirement that schools make personal phone calls to parents of students who are involved with the child welfare system, rather than using automated phone systems. Such calls are more likely to reach parents and caregivers, utilize the most up-to-date phone numbers, and generate calls back from parents. We are concerned, however, about referring to these children as students “whose safety may be in question.” Such a designation may invite discretion on the part of school staff to speculate as to which students may be “unsafe” and risks further stigmatizing students whose families are already subject to overwhelming scrutiny. **Instead, we suggest using the language laid out in III.D above, so that this Part reads, “except when inquiring about the absence of a student ~~whose safety may be in question involved with the child welfare system...~~”**

INVESTIGATION OF CAUSES OF ABSENCE AND THE FORM 407 TRACKING SYSTEM – SECTION 4

Educational Neglect Inquiry – IV.B

While it may be helpful to school personnel to include additional information about educational neglect in the Chancellor’s Regulation, it is important that such information comport with definitions of neglect in the Family Court Act and guidance from the State Education Department (SED) and the Office of Children and Family Services (OCFS) concerning local policies and procedures for reporting educational neglect by school districts.¹ Regulations need to be protective of student safety while respecting the rights of parents, since in the vast majority of cases, children’s best interests are served when their families are not subjected to investigation by ACS, which can be incredibly stressful and impact parents’ current employment and future employment opportunities, in addition to increasing tension between parents and schools, which can have a destructive effect on a child’s education. In light of these concerns, we suggest the following modifications to this section:

1. ...
 - a. The student is excessively absent from school.

Explanation: SED lists excessive absence as a necessary element of a report of educational neglect, based on guidance established by the SCR.

¹ See New York State Education Department, Educational Neglect, available at <http://www.p12.nysed.gov/sss/pps/educationalneglect/>, describing model practices and procedures for local social services districts and school districts regarding the reporting and investigation of educational neglect, in compliance with § 34-a of the Social Services Law.



- b. ...
- c. There is reasonable cause to suspect that the parents contributed to the child's absences or ~~are~~ is failing to take steps to effectively address the problem and return the child to school, though financially able to do so or offered financial or other reasonable means to do so (i.e., failure to provide a minimum degree of care)...

Explanation: Parent was changed from the plural “parents” to match the singular use of parents in B.1 and B.1.b. The language about financial ability was added as it is an important component of the definition of neglect in the Family Court Act and was otherwise left out of the explanation of educational neglect included in this section.

- 2. Whenever a student has unexplained absences of ten (10) or more consecutive days, ~~educational harm may be presumed and~~ schools must conduct an expedited inquiry into whether other indicators of educational neglect are present.

Explanation: There is no need for schools to presume educational harm or impairment to students after 10 or more consecutive absences as long as this number of absences triggers a school-based investigation, as is already the case with the Form 407 process. Such a presumption has no impact on the school's practice and can only be prejudicial to parents in further investigations and court proceedings. As SED states in its Educational Neglect document, “Whether there is actually such impairment or risk is an issue for investigation by CPS [Child Protective Services]” and not school personnel. Therefore, we strongly recommend removing this presumption from the proposed Regulation.

We recommend adding “expedited” to this part, to more closely match the proposed language in Chancellor’s Regulation A-750.

- 3. ...
 - a. ...
 - b. The role of the parent: whether the school has been ~~unable~~ to make contact with the parent ~~despite outreach efforts~~; whether the parent has cooperated with, resisted or rejected the school’s requests for information and assistance; whether the parent can or cannot provide an explanation for a child’s absences...

Explanation: The regulations should be clear that, when schools are recording the results of parent outreach into ILOG or on the Form 407, they should include



successful outreach attempts and positive responses from parents, not just negative responses or failures to connect with parents.

- d. ...
4. Based upon the results of the expedited educational neglect investigation, if the school has reasonable cause to suspect educational neglect or any form of abuse or maltreatment...

Explanation: The regulations should be clear that schools are required to report suspicions of abuse and maltreatment (i.e., neglect) to the SCR, not just abuse. These additions also ensure that B. 4 conforms to B.3.c of this section and Section I.E.2.c.iv of Chancellor’s Regulation A-750.

Note – IV.C

New York Social Services Law § 413 requires school officials to report reasonable suspicions of “child abuse or maltreatment.” To conform to these legal requirements, we recommend that this section read, “a report to SCR must be made whenever school officials have reasonable cause to suspect child abuse or maltreatment; ~~including neglect or abuse~~, even if...”

CLEARANCE OF REGISTER – SECTION 5

In accordance with the concerns about language use discussed above, we recommend **changing the final sentence of this section to read, “This program must address the school’s plan to identify and monitor the attendance of students involved with ACS the child welfare system in accordance with Section III.D of this regulation and Section III of Regulation A-750.**

CHANCELLOR’S REGULATION A-750: CHILD ABUSE PREVENTION

As an initial matter, we recommend **changing the name of the Regulation to “Child Abuse and Neglect Prevention.”** Over 70% of calls to the SCR involve allegations of neglect, not abuse, and a significant portion of this regulation and the Tiered Response Protocol involves reporting and monitoring educational neglect. Adding neglect to the title will more accurately reflect the purpose of the regulation and the circumstances students and their families face.

PREFACE

The preface of Chancellor’s Regulation A-750 includes summary definitions of various forms of child abuse and neglect. While there are no proposed changes to this



section, we would like to note that the definitions included here do not conform to definitions in the Family Court Act, and **we recommend that the language be modified to more accurately reflect the legal definitions.** For example, the summary definitions conflate aspects of abuse and neglect, particularly for physical and emotional abuse and neglect, and leave out forms of neglect related to parental or child substance abuse and excessive corporal punishment. Importantly for many low-income families, the regulations also fail to include the poverty exception that is part of the definition of neglect, which only applies when parents are “financially able to do so or offered financial or other reasonable means to do so.”

PROCEDURES FOR REPORTING TO THE NEW YORK STATE CENTRAL REGISTER FOR CHILD ABUSE AND MALTREATMENT – SECTION 1

Making a Report – I.A.5

We oppose transferring responsibility for collecting reports of calls to the SCR from the Deputy Director for Student Services to a Field Support Center “Designee for child abuse matters.” Throughout the rest of the Regulation, the Deputy Director for Student Services at the FSC is responsible for making determinations about releasing records to the NYPD or District Attorney (I.C.3), collecting reports whenever a child is transferred to a Child Advocacy Center or Child Protective Center (II.B.3.d-e), regularly sharing information with schools about students with child welfare involvement (III.B), and overseeing all child abuse and neglect matters in his or her schools (V.A). Under the circumstances, he or she should also be responsible for collecting reports by schools to the SCR.

Should the Deputy Director be allowed to designate this or any of these duties to other FSC staff, **we strongly recommend**, as mentioned above in regards to the Tiered Response Protocol, **that this staff member is referred to as the “child welfare point” or “child welfare designee,”** rather than the Designee for child abuse matters, as proposed here.

Policies and Procedures for Reporting Educational Neglect – I.E

The proposed changes to Section I.E. are substantially similar to those proposed additions in Section IV.B and C of Chancellor’s Regulation A-210. Our comments and recommendations with respect to Part I.E here are the same as those discussed above. In addition, **we recommend changing E.2.c.iv to read, “...has reasonable cause to suspect educational neglect or ~~other-any~~ forms of abuse or maltreatment...”** to match our recommended language in A-210 Section IV.B.4.



PROCEDURES FOR COOPERATING WITH THE LOCAL CHILD PROTECTIVE SERVICES (CPS) INVESTIGATIONS OF SUSPECTED CHILD ABUSE – SECTION 2

While not directly addressed by the Tiered Response Protocol or in any proposed changes to the Regulations, we have seen communication from the Office of School Health indicating that DOE is considering requiring school nurses to take and collect photographic evidence of visible bruising or other signs of suspected abuse, and instructing nursing staff to refer children to the emergency room if they suspect injuries to the child’s breasts, genitals or perineal areas. Section II.B of A-750 already includes detailed instructions for schools when physical or sexual abuse is suspected, including how students are to be transferred to Child Advocacy Centers or Child Protective Centers for multi-disciplinary assessments in a child-friendly setting. The use of these centers is encouraged whenever possible to minimize trauma to children during child protective or criminal investigations, and we are concerned that the DOE may direct schools to send students to the emergency room, rather than utilizing these established procedures, in sensitive cases involving child physical or sexual abuse.

POLICIES AND PROCEDURES FOR ESCALATING ABSENCE CONCERNS REGARDING STUDENTS INVOLVED WITH THE ADMINISTRATION FOR CHILDREN’S SERVICES (ACS) – SECTION 3

As mentioned earlier, we are concerned about the DOE’s description of students with child welfare involvement as “ACS-involved students,” for the reasons discussed above. Instead, we **recommend changing the name of this section to “Policies and Procedures for Escalating Absence Concerns Regarding Students Involved with the Child Welfare System.”** In addition, whenever the term “ACS-involved students” is used in this Regulation, we **strongly recommend replacing it with the phrase “students with child welfare involvement.”**

Review and Assessment – III.C

As discussed earlier, we are concerned about the use of child welfare indicators in ATS to generate attendance reports and otherwise monitor the performance of students with child welfare involvement, given our doubts about the accuracy of these fields in ATS and for the reasons discussed above re: Section 3 of the Tiered Response Protocol. **We recommend using the lists provided by the FSC Deputy Directory for Student Services instead.**

Part III.C.3 references a “school-based point” to monitor the attendance and school progress of students in Tiers 1, 2 and 3 and conduct outreach to parents, while the



Tiered Response Protocol refers to this person as a “Success Mentor.” We **recommend using the same term in both documents to avoid confusion among school personnel.**

Escalation of Concerns to ACS and SCR – III.D

As discussed above, we are concerned about the proposed requirement that schools notify ACS whenever they make a report to the SCR. **We recommend removing it from proposed changes to the Regulation,** for the reasons explained above with reference to Section III.B of the Tiered Response Protocol.

RESPONSIBILITIES OF FIELD SUPPORT CENTERS AND CHILD ABUSE PREVENTION AND INTERVENTION TEAMS – SECTION 5

Field Support Centers – V.A

Throughout this Part, the proposed changes refer to the FSC Deputy Director for Student Services as responsible for “child abuse matters.” **We strongly recommend that this responsibility be changed to “child welfare abuse matters,”** for the reasons discussed above. In keeping with our recommendation to change the title of the Regulation to “Child Abuse and Neglect Prevention,” **we also recommend adding “and neglect” to this Section whenever child abuse prevention is discussed.** The DOE’s own Coordinator for these issues has the title “Citywide Coordinator for Child Abuse and Neglect Prevention,” so it makes sense that the Regulation, FSC, and school-based staff use the same terminology. With these changes, Part V.A.1 of this section would read:

The FSC Deputy Director for Student Services is responsible for child ~~abuse~~ welfare matters. In particular, the Deputy Director is responsible for: a) reviewing, evaluating and approving each school’s child abuse and neglect prevention plan; b) serving as a liaison with the DOE Citywide Coordinator for Child Abuse and Neglect Prevention, the SCR, the local CPS and other service providers; c) establishing a working relationship with the local CPS, community agencies and other service providers to improve communication and services for school staff, parents and students; d) receiving reports from principals on all cases reported to the SCR and maintaining close communication with the local CPS; e) providing ongoing support and training on child abuse and neglect prevention to school administrators and school teams....

In Part V.A.2, we recommend changing the language to read, “...ensuring that schools receive and are aware of information indicating regarding the ACS-involved students with child welfare involvement in their schools...” for the reasons discussed above.



Child Abuse Prevention and Intervention Teams – V.B

For the reasons discussed above, we recommend changing the title of this Part to “Child Abuse and Neglect Prevention and Intervention Teams.” Wherever the Regulation refers to child abuse, child abuse prevention or child abuse prevention and intervention teams, we recommend inserting “and neglect” after abuse.

In V.B.2, we recommend adding communication with preventive services agencies to the list of the school liaison’s responsibilities, since preventive services can be a great support to many families and can be an instrumental tool for preventing abuse and neglect and improving child welfare. The regulation would therefore read, “The designated liaison shall assist in facilitating interagency communication and the sharing of information between the school, the local CPS and foster care and preventive agencies.”

TRAINING PROGRAMS AND PARENT AND STUDENT EDUCATION – SECTION 6

Similar to the comments above, we recommend adding “and neglect” wherever the term “child abuse” is used in this section, as well as Sections VII, VIII and IX.

NOTIFICATION – SECTION 7

Part A, referring to the CFN Youth Development Child Abuse Prevention Team, should be deleted as this team no longer exists.

Thank you for the opportunity to comment on the proposed amendments to Chancellor’s Regulations A-210 and A-750. Please do not hesitate to contact us if you have any questions.

Respectfully,

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cc: Panel for Educational Policy