



April 26, 2012

Gladys Carrion, Esq.  
Commissioner  
New York State Office of Children and Family Services  
52 Washington Street  
Rensselaer, NY 12144

Dear Commissioner Carrion:

As you may know, a group of concerned organizations recently convened to advocate for the State of New York to fulfill its commitment to commercially sexually exploited youth and fund the Safe Harbor Act. Safe Harbor was passed in 2008 with two major components: first, to end the practice of prosecuting commercially sexually exploited children for prostitution offenses; and second, to provide a statewide system of prevention and treatment for children who survive commercial sexual exploitation. Although New York State did not implement the second component of this legislation when the law was enacted, we are grateful to the New York State legislature and the Governor for including funding in the FY13 budget to establish services for commercially sexually exploited children.

We understand that the Office of Children and Family Services will oversee the programming made possible by the \$1.5 million that has been allocated. As organizations working directly with victims and survivors of commercial sexual exploitation, we are acutely aware of the areas in which current social, health and mental health services fall short of what victims of commercial sexual exploitation need. For this reason, we write now and encourage OCFS to involve organizations such as ours in planning for these services. Toward this end, we ask that OCFS consider issuing a Concept Paper outlining the agency's initial thinking, to which providers, advocates and other experts could respond. We also will be happy to make ourselves available for meetings and conversations with OCFS.

Moreover, we urge OCFS to rapidly put plans into motion with a clear intention to expend these funds as quickly as possible. Thousands of children are in need and cannot afford delays and we very much want to ensure that these funds are not, as they were in the past, repealed because of budgetary pressures.

We also want to share our suggestions regarding the most impactful use of these additional funds:

- *Crisis Shelter:* There is presently insufficient immediate shelter available to young people who need to escape commercial sexual exploitation. A portion of the allocation should be spent to create dedicated, short-term crisis beds and crisis case management. Our recommendation is that these beds be located in New York City and that they be available for intake on a 24/7 basis.

- *Case Management:* Crisis case management services should be co-located at crisis shelters, both the proposed specialized shelter as well as existing Runaway and Homeless Youth shelters. Young people in crisis should be afforded access to these services regardless of their need for shelter. Crisis case management services would include but not be limited to diagnostic assessments, medical care, substance abuse treatment, mental health treatment, individual counseling, therapeutic services and educational services; these services should also be available on a 24/7 basis.
- *Community-Based Services:* Some children who seek to escape commercial sexual exploitation may have access to safe shelter and/or family involvement but still need access to emergency services and ongoing support. Community-based services should provide ongoing assistance to these children and their families, including but not limited to outreach, drop-in services, family therapy, educational support, case management, vocational support, health care, and referrals to other services as needed.
- *Specialized Family Foster Care:* We recommend that OCFS direct the Local Social Service Districts to create local plans for working with commercially sexually exploited children and youth through family-based foster care, and that OCFS support those plans by providing funding over and above the block grant as necessary.

Although we recognize that this cannot be addressed within the limits of funding available in the current State budget, we want to underline the importance of longer-term therapeutic housing as outlined in the Act. Commercially sexually exploited youth bring a host of complicated issues that can be best treated in a safe house that cannot be readily accessed by perpetrators of sexual exploitation, and allow them to work intensively to heal.

We will be in contact with your office shortly in hopes of scheduling a meeting to discuss these matters with you. If you have any questions, please feel free to contact James Purcell from COFCCA at (212) 929-0870.

Thank you very much for your attention to this crucial matter. We look forward to partnering with OCFS to fulfill our obligations to a very vulnerable and most deserving population.

Sincerely,

Children's Aid Society  
 Council of Family and Child Care Agencies  
 Covenant House  
 ECPAT-USA  
 Empire State Coalition of Youth and Family  
 Services  
 Equality NOW  
 Girls Educational and Mentoring Services  
 Good Shepherd Services

Graham-Windham Services to Families &  
 Children  
 Jewish Child Care Association  
 My Sisters' Place  
 New York State Anti-Trafficking Coalition  
 Not For Sale Campaign  
 Rabbis for Human Rights-North America  
 Safe Horizon  
 St. Luke's Roosevelt Hospital  
 UJA-Federation of New York