OUT-OF-STATE PLACEMENT COMMITTEE: ANNUAL REPORT TO THE GOVERNOR AND LEGISLATURE

JANUARY - DECEMBER 2006

Submitted by: Council on Children and Families Pursuant to: Chapter 392 of the Laws of 2005

OUT-OF STATE PLACEMENT COMMITTEE MEMBERS

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Office of Alcoholism and Substance Abuse Services

Division of Budget

State Education Department

Office of Children and Family Services

Department of Health

Office of Mental Health

Office of Mental Retardation and Developmental Disabilities

Division of Probation and Correctional Alternatives

Commission on Quality of Care and Advocacy for Persons with Disabilities

Out-of-State Placement Committee Annual Report to the Governor and the Legislature for January – December 2006

INTRODUCTION

Background

Children and families have access to a broad array of services in New York State. Some children, however, have complex, co-occurring medical, mental health, developmental, substance abuse and/or educational needs that are not readily addressed within the community and require their being served outside their homes and, in certain instances when services are not available within New York State, to be in service settings located outside of New York State.

Committee Objectives

The Out-of-State Placement Committee, pursuant to Chapter 392 of the Laws of 2005, was established within the Council on Children and Families to fulfill three major objectives intended to increase and more effectively coordinate the availability of community-based and residential services in New York State and to protect children who may require placement in programs located outside New York. Specifically, the Committee was charged with developing recommendations to:

- Develop a monitoring and accountability structure to address the health and safety of children served by out-of-state schools and facilities;
- Enhance New York's service system infrastructure to allow for the children most at risk of being referred to out-of-state schools and facilities to be served within New York in the most appropriate, least restrictive setting; and,
- Strengthen in-state mechanisms that enhance service delivery across agencies.

Out-of-State Placement Committee Members

The Out-of-State Placement Committee is chaired by the Acting Executive Director of the Council on Children and Families and comprises the commissioners of the following state agencies: Office of Children and Family Services (OCFS), State Education Department (SED), Office of Mental Health (OMH), Office of Mental Retardation and Developmental Disabilities (OMRDD), Office of Alcoholism and Substance Abuse Services (OASAS), Department of Health (DOH), and the Division of Probation and Correctional Alternatives (DPCA).

Out-of-State Placement Committee Members Council on Children & Families, Chair

- · Department of Health
- Division of Probation and Correctional Alternatives
- Office of Alcoholism and Substance Abuse Services
- Office of Children & Family Services
- Office of Mental Health
- Office of Mental Retardation & Developmental Disabilities
- State Education Department

Additional agencies and non-governmental representatives participate through a work group and subcommittee structure. The agencies include the Division of the Budget (DOB) and the Commission on Quality of Care and Advocacy for Persons with Disabilities (CQCAPD). Non-governmental representatives include two family liaisons with experience in out-of-state residential placements, and the statewide director of the Coordinated Children's Services Initiative (CCSI). There have also been ongoing

dialogues and consultations with representatives of key child serving organizations and advocacy groups. The joint input from state and nongovernmental organizations regarding Committee strategies and recommendations have proven essential to the sustained success of this initiative.

This 2007 Annual Report to the Governor and Legislature identifies key accomplishments of the Committee and its member agencies, summarizes the challenges encountered, provides recommendations, and offers next steps for 2007.

OBJECTIVE 1: DEVELOPMENT OF ACCOUNTABILITY AND MONITORING STRUCTURES TO PROTECT THE HEALTH AND SAFETY OF CHILDREN SERVED BY OUT-OF-STATE RESIDENTIAL FACILITIES AND SCHOOLS

Accomplishments

During 2006, the Committee made considerable strides in developing and/or establishing accountability and monitoring structures within and across state agencies. This was accomplished through planning and/or implementing a combination of increased oversight, improved monitoring mechanisms and integrated contractual parameters. Accomplishments related to this objective are described below.

1.1 Proposed Development and Enhancement of Out-of-State Placement Units

An essential means to protect children who are placed in facilities located out of state is through careful oversight and the provision of continuous technical assistance. This form of oversight and guidance is provided by an out-of-state unit located within SED and would be provided by a similar unit proposed for OCFS.

<u>The Non- District Unit (NDU)</u> was created within SED's Vocational and Education Services for Individuals with Disabilities (VESID) in 2005 through staff transfers from other special education units. The purpose of the unit is to provide consistent oversight and technical assistance to all approved in-state and out-of-state residential schools. Eighty-four percent of all approved schools (83 of the 99 schools) have had a formal onsite review since June 2005 and the remaining schools will receive such a review by June 2007, utilizing a protocol developed specifically for these schools. NDU staff provide follow-up to each site once the review is conducted and work with site staff to correct deficiencies. SED will be adding some additional staff to this unit to assume greater program oversight and development responsibilities.

An Out-of-State Placement Oversight (OSPO) Unit has been proposed to be established within OCFS. The proposed core responsibilities for this unit include conducting on-site joint reviews with SED and other relevant state service agencies to verify that the out-of-state facilities and schools are in compliance with New York State laws and regulations. In addition, this unit would create and maintain a registry of all approved out-of-state residential facilities. The unit would also be responsible for internal activities that include developing a series of gate keeping functions so referrals for children from local departments of social services (LDSS) and the Administration of Children's Services (ACS) for out-of-state placements are first sent to the OSPO for review in order to maximize in-state placement. Unit staff would work with voluntary agencies to build capacity in New York to avert out-of-state placements.

<u>Coordination of NDU and OSPO</u> - The out-of-state units will work in concert with each other and the relevant member agencies of the Committee by planning and coordinating site visits and

agency reviews to out-of-state residential facilities. These units will develop monitoring tools that will make certain that New York State youth are receiving the most appropriate treatment and care. Additionally, the out-of-state units will enforce the *Draft Accountability Guidelines* (Appendix A) that make certain that for every youth at risk of out-of-state placement, all appropriate local and regional resources have been utilized.

<u>Financial Disincentives</u> - SED and OCFS are individually developing authority mechanisms for choosing not to participate financially in the costs of placements when certain conditions are present (i.e., placement in an out-of-state facility or school that does not meet core requirements articulated in statute or an out-of-state placement when an acceptable in-state alternative is identified.) Regulatory changes would be required for these mechanisms to be put into place.

<u>Information Sharing</u> - SED and OCFS will develop separate but equivalent information data bases and will develop a Memorandum of Understanding (MOU) that will allow for sharing of information on any New York State youth that is referred to an out-of-state residential placement. SED and OCFS are working with other agencies (OASAS, OMRDD and OMH) to develop the necessary data fields for these databases.

1.2 Development of Agency Registries of Out-of-State Residential Schools and Facilities

A fundamental objective of the Out-of-State Placement legislation is to protect the health and safety of children placed in out-of-state facilities. One means of achieving this objective is through the development of registries by OCFS and SED. The purpose of the registry is to make known which residential and education facilities located in other states are approved by New York's child-serving agencies who oversee or monitor the placement of children in out-of-state facilities. To date, SED has available on its website a listing of all educational facilities located outside of New York State that are authorized to receive public funding for the provision of services to students with disabilities. OCFS is working on establishing its registry.

In addition to the two agency-specific registries, the Committee is responsible for developing a comprehensive registry of these out-of-state facilities, which will be hosted on the Council website and serve as a compendium of the agency registries. A placeholder has been posted on the Council website and will become active once the agency registries are finalized. This placeholder currently links to the SED online listing of residential schools.

1.3 Development of Registry Core Requirements

It is essential that each agency registry have common elements so that the facilities identified in those registries are comparable. To that end, four core requirements were mandated by statute and specified that:

- 1. If the out-of-state congregate residential program or residential school provides residential care to children from New York State, at least one member of the out-of-state placement committee or his or her designee has conducted a site visit of such out-of-state congregate residential program or residential school, as appropriate, within time frames as the committee shall determine;
- 2. The out-of-state congregate residential program or residential school holds a current license or charter from the appropriate state agency or agencies of the state in which the program or facility is located;
- 3. Appropriate laws and regulations exist in the state where the congregate residential program or residential school is located for the investigation and resolution of allegations of abuse or neglect;

4. The appropriate member or members of the out-of-state placement committee shall have evaluated the out-of-state congregate residential program or residential school to determine whether the care and education being provided are consistent with New York State law and the applicable committee member agency's regulations.

The Committee developed two documents to address these requirements and to work toward more coordinated efforts across agencies.

- Registry Core Requirements Checklist: A detailed evaluation checklist was developed using the four requirements outlined in statute for inclusion in the comprehensive registry. The checklist outlines the procedures to take and criteria that should be met for the out-of-state program or school to be compliant with the core requirements (Appendix B).
- Interagency Review Process: As the Committee grappled with the roles of the various state agencies in evaluating out-of-state programs and schools, it became clear that an interagency process was needed to reflect the intent and spirit of the law. The interagency review process provides guidance on:
 - Initiating the review of an out-of-state program or school for inclusion in the comprehensive registry;
 - o Conducting the review and site visit; and
 - o Identifying essential types of periodic follow-up reviews and monitoring activities (Appendix C).

1.4 Establishment of Recommended Contract Parameters

By statute, the Committee is responsible for recommending to OCFS and SED contractual language that would enforce greater accountability for the health and safety of those children who are referred to out-of-state residential schools and facilities. The proposed contract parameters are as follows:

- The Agency warrants that it and its staff have all the necessary licenses, approvals and certifications currently required by the laws of any applicable municipality or local, state or federal government. The Agency further agrees to keep such required licenses, approvals, and certificates in full force and effect during the term of this Agreement, or any extension thereof, and to secure any new licenses, approvals or certificates within the required time frames.
- The Agency shall immediately, upon receipt of information, notify the Department/School District of any enforcement action taken with respect to such license, approval or certificate and any action the Agency is taking with respect thereto. The Department/School District agrees to immediately notify the New York State Office of Children and Family Services/State Education Department of such enforcement action and Agency remediation, and
- If an Agency is located outside of New York State, the Agency agrees to take all necessary steps to become and remain on the out-of-state placement registry in accordance with section 483-d of the New York State Social Services Law, to provide any requested information to committee members consistent with applicable State and federal laws, and to authorize the New York State Office of Children and Family Services, the State Education Department and any other committee member or designee to conduct announced and unannounced visits of the Agency, its programs, and facilities.

The Committee recommended that additional language be integrated that requires notification of the death of any child from any state in that facility, and that the referring agency and relevant state agencies be notified of any emergency treatment in that facility. SED was not in agreement with this recommendation. The additional proposed requirements are as follows:

• The Agency must immediately, upon receipt of information, notify the State Education Department and Department/School District whenever any child in the Agency's care has died. Such notification must include contact information setting forth the government agency responsible for oversight of the Agency; and

• The Agency must immediately, upon receipt of information, notify the State Education Department and the Department/School District whenever a child who has been placed pursuant to contract has suffered an injury, accident or illness which requires emergency medical treatment at a hospital or urgent care center on either an inpatient or outpatient basis.

OCFS will include language reflecting all of these parameters in its model contract, which is required for contract development by local departments of social services. Language provided by OCFS may not be amended, but local departments may add to the contract to address specific issues. Local school districts do not use a standard model contract developed by SED. Instead, SED will notify its local education agencies through administrative memorandum to comply with those parameters identified in statute.

Challenges

Data Collection and Management across Agencies

One of the challenges confronted by state agencies participating in this effort is the development of a database that can be shared across systems. SED and OCFS have been collaborating to build a set of data profiles for each child referred to out-of-state facilities, and have also worked at developing data that can be used to map both needs and opportunities for service of these children and future children; but the process has been difficult, and at times, data have been difficult to reconcile. This is a challenge that will continue to be addressed in 2007.

Another relevant data issue is the need to develop a mechanism to explore emerging trends related to the service needs of children ages 7 to 12 and plan for the allocation of resources in the next five years to address those emerging needs. Developing this mechanism and understanding these trends will help in planning for future infrastructure needs.

OCFS and SED, along with other member agencies, are planning to address these data issues and develop a geographic information system (GIS), that will help inform the OSPO and NDU bureaus, respectively, and their local referring agencies of critical in-state infrastructure for children currently or at-risk of going out-of-state.

RECOMMENDATION 1: ESTABLISH THE OCFS OUT-OF-STATE PLACEMENT OFFICE FOR THE DEVELOPMENT OF A REGISTRY AND IMPLEMENTATION OF AN INTERAGENCY REVIEW PROCESS.

Rationale: The Office of Children and Family Services proposes establishing an Out-of-State Placement Office, which will be responsible for managing the process for children referred to out-of-state residential schools and facilities by local departments of social services, and will be responsible for managing the interagency review process for inclusion of facilities on a registry of approved out-of-state schools and facilities, and conduct on-site visits to out-of-state facilities where children have been placed. As this is a new function for OCFS, funding is needed to establish the new office. Additionally, SED has been working to strengthen its functioning in this area. While it does not require the establishment of a new office, it may require future resources to strengthen its functioning.

OBJECTIVE 2: ENHANCEMENT OF THE STATE INFRASTRUCTURE TO ALLOW FOR THE CHILDREN MOST AT RISK OF BEING REFERRED TO OUT-OF-STATE SCHOOLS AND FACILITIES TO BE SERVED WITHIN NEW YORK IN THE MOST APPROPRIATE, LEAST RESTRICTIVE SETTING

Accomplishments

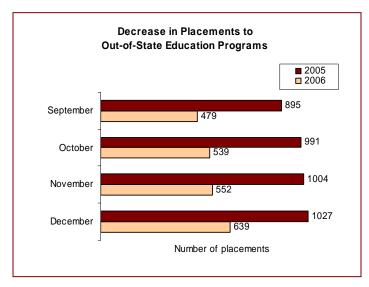
The key to reducing and preventing out-of-state placements is the availability of and families' access to an in-state infrastructure of home-based, community-based, and residential services that address the multi-systemic needs of children who may be at risk of out-of-state placement. Through individual and coordinated state agency efforts, the educational and human services infrastructure is being strengthened to better serve children and youth in the most appropriate and least restrictive settings.

Efforts made to address children's complex service needs have demonstrated that it is possible to serve these children in New York when appropriate resources and supports are provided. State agencies serving children who typically would be placed in out-of-state programs are exploring ways to increase their system capacity to enable children to be served within their communities or in residential settings in New York State.

2.1 Agency Specific Efforts to Reduce the Number of Children in Out-of-State Residential Schools and Facilities

The total number of children placed in out-ofstate residential settings by local education agencies and local departments of social services decreased from 1,200 in June 2005 to 905 as of December 2006.

The State Education Department, through VESID, reported that it has significantly strengthened its gate keeper function in relation to approving requests by school districts to place certain students with disabilities in out-of-state programs.



Staff verify that all appropriate in-state placement options have first been fully considered. In addition, the decline observed was partially due to individuals who returned to New York from out-of-state placements. About half of the decrease in out-of-state placements was the result of individuals aging out of programs or graduating. The other half is a result of individuals who returned to residential or community-based services in New York State. These efforts, combined with increased in-state residential capacity, have resulted in a 38-percent decrease in the number of out-of-state residential placements between December 2005 and 2006 (Figure 1).

<u>The Office of Children and Family Services</u> has reviewed the number of children placed out-of-state in residential facilities, using data from February and December 2006. This review indicated that a total of 219 children were placed out-of-state in February 2006 with the majority of children from Suffolk, Nassau and Westchester counties. As of December 2006, the number of children was 266, again with most children from those same counties. OCFS is investigating the reasons for this increase and why these three counties are placing so many children out of state.

2.2 Agency Specific Efforts to Build Capacity Within New York

<u>State Education Department</u> efforts to develop intensive in-state programs for hard-to-place youth, coupled with a proactive approach to direct referral sources to those programs, has reduced the rate of out-of-state placements made by Committees on Special Education (CSE)—the committees at the local school district level responsible for placement of children with special educational needs.

Through VESID, SED has coordinated an interagency work group charged with developing increased instate capacity to meet the needs of students at risk of out-of-state placement. A three year plan was developed and is being implemented which will result in more than 300 new beds for students with developmental disabilities; and 132 new beds for students with emotional disabilities. An additional 500 beds formerly accessed by the Administration for

Interagency Plans for Increased Bed Capacity

From SED 3-Year Plan

- More than 300 new beds for students with developmental disabilities (OMRDD certified)
- 132 beds for students with emotional disturbance (OCFS certified)
- 500 unused ACS and LDSS beds

From DOH/OCFS Waivers

 Aid to 3,303 foster care children who are medically fragile, have a developmental disability and/or have a severe emotional disturbance

From OMRDD

· 300 additional beds

From OMH

 An additional 180 Home & Community-Based Service slots

Children's Services (ACS) and local social service districts (LDSS) are also being made available for school district placements through their committees on special education (CSEs).

SED recognized it was important to utilize current beds as efficiently as possible in addition to creating more beds; however, a lack of current and accurate information about in-state residential school openings was hindering CSE work and leading to unnecessary out-of-state placements. Therefore, VESID worked with numerous statewide organizations (e.g., NYS School Boards Association, Council on Family and Child Caring Agencies) to develop a web-based capacity notification system. Initiated in March 2006, this system gathers updated information on bed openings each week from the in-state residential schools and makes it available on the VESID web site to all school district CSEs. An evaluation of the system's effectiveness and ease of use is currently being conducted.

Additionally, SED plans to continue to work with other state agencies to determine the need for improving and expanding educational day treatment programs within New York State. Depending upon the results of this specific SED-led needs assessment, the Committee may recommend that a letter of intent be developed by the appropriate state agencies to improve access to day treatment programs throughout the state. Currently, SED cannot commit to an allocation of resources or assignment of staff to this activity, but the Committee will integrate it into its 2007-08 strategy.

<u>Department of Health and Office of Children and Family Services</u> research and work with local social services districts lead to estimates that 8,000 children currently in New York's foster care system could be eligible to receive community-based, specifically designed non-medical services through a Medicaid Home and Community-Based Services (HCBS) waiver program. OCFS has developed three foster-care-specific waiver applications for children who are medically fragile, developmentally disabled or who have severe emotional disturbance. Known collectively as *Bridges to Health* (B2H), the waivers are being negotiated with the U.S. Centers for Medicaid and Medicare Services (CMS). The development of B2H was authorized by legislation directing the

New York State Department of Health (the State's Medicaid agency) to apply for a waiver to serve children in the care and custody of local departments of social services and OCFS. The waivers will enable many children who might otherwise be at risk of out-of-state residential placement to be served within New York State. OCFS worked with representatives of various New York State agencies, including DOH, DOB, OMH, OMRDD, and OASAS to design the B2H program. This program will provide family and community support services to a proposed 3,303 children statewide that will supplement, not replace, the existing foster care and Medicaid State Plan programs. The roll-out is planned over three years beginning in October 2007.

Office of Mental Retardation and Developmental Disabilities does not have a direct role in referring children to out-of-state facilities or returning them to New York State programs. However, OMRDD has collaborated with SED and OCFS to enhance existing services and develop additional capacity in-state. In partnership with SED, OMRDD has developed a multi-year plan with its voluntary provider network to double the Children's Residential Project (CRP) capacity by adding over 300 beds to this program. Comparable educational facility expansion will be supported by SED. During FY 2006-07, CRP homes operated by Utica United Cerebral Palsy (UCP) will open to serve twelve children. Additional development by other providers will continue over the next several years.

Increased beds are not the only means used by OMRDD to build capacity. Working with OCFS, OMRDD supported efforts to increase operating resources and enhance the physical plants of voluntary partners. Enhanced staffing and capital improvements will provide attractive in-state alternatives to out-of-state facilities.

OMRDD also funds specialized services for at-risk children with developmental disabilities who cannot access programs elsewhere. These special populations include children with autism and autism spectrum disorders, intensive medical needs, Prader-Willi Syndrome, challenging behaviors, and dual diagnoses of mental illness and mental retardation. OMRDD serves these individuals and their families through uniquely developed programs such as specialized residences, clinical interventions, staff training, and applied scientific research. All of these initiatives offer viable New York State service opportunities to diminish the need for out-of-state placements.

Office of Mental Health In 2006-07, OMH began a series of fundamental changes in the way that services are provided, the means through which services are accessed and profound improvements in clinical quality. The initiative known as Achieving the Promise provided for major reform of clinic treatment through Child and Family Clinic-Plus. Clinic-Plus will identify emotional issues earlier in children's developmental trajectory, expand clinic capacity and to help young people stay at home and in their community with their families. In addition, the Home and Community-Based Services Waiver program was expanded to 1,326 slots, access to child psychiatry was improved through expansion of the Rural Telepsychiatry program and a first of its kind center, dedicated to bringing treatments that are proven by science to work into everyday practice was initiated.

OMH is working closely with the SED and the Board of Regents to implement the P-16 Plan, to improve coordination between schools, mental health and health. OMH is also collaborating with its partners in education in the implementation of the Children's Mental Health Act of 2006 which calls for the establishment of social emotional learning standards.

OMH supports local service delivery planning through its Single Points of Access (SPOA). These local structures support children and their families with significant emotional disturbance gain access to services in the community.

2.3 Needs Assessment of Children Currently Served by Out-of-State Facilities and Schools

The early signs of progress made in building capacity within our state validate the Committee's belief that children can be served within New York, with an appropriate commitment to resources and increase in access to more effectively coordinated services by children and families with complex needs. The Committee, pleased with the progress described above, also recognized children placed out-of-state have complex needs and may require more intensive services than the majority of facilities within New York State are currently unable to provide. Furthermore, the Committee realized that more specific data on these children and the specific interventions they required were needed and began gathering information from the local social service districts and school districts to establish a profile of youth being served outside New York. These profiles should be available to the Committee by mid-2007.

Challenges

Enhancing In-State Residential Infrastructure

Reducing the number of out-of-state residential placements and decreasing the average lengths of stay will not be fully addressed without comprehensively and methodically figuring out how to build capacity for in-state residential and community-based services, based on existing needs, specific therapeutic interventions, and emerging trends for children at risk of out-of-state residential placements in New York State.

Various factors come into play for the providers of residential services in New York State when assessing their ability to appropriately and safely serve the needs of current and future children and youth. These factors include the age and design of the physical plants; the intensity of service required; the student-teacher-aide ratios; and the reimbursement rates. It is incumbent on the Committee to approach these factors in a coordinated, methodic and strategic way.

In the course of its work and in the development of improved in-state infrastructure, the Committee is keenly aware of the balance it needs to strike in promoting community-based services and in fostering expansion of residential schools and facilities. Planning for increasing or transforming beds to meet the needs of children at risk or coming back from out-of-state placement needs to be done in context with the work being done to promote community-based, preventive services.

OBJECTIVE 3: STRENGTHEN IN-STATE MECHANISMS THAT ENHANCE SERVICE DELIVERY ACROSS AGENCIES

Accomplishments

One of the factors contributing to children being referred by local departments of social services and committees on special education to out-of-state residential facilities is a lack of coordination in the development of a comprehensive service plan, informed by all relevant systems and stakeholders. This lack of coordination and awareness can begin at the assessment phase and follow through numerous placements and transitions. As prescribed in statute, the Committee has begun to address this issue.

3.1 Development of Draft Accountability Guidelines

To further the development of model processes, the Committee reviewed existing statewide and local mechanisms currently in place that are used for planning and coordinating services for children and their families. The mechanisms reviewed included: the Coordinated Children's Services Initiative (CCSI), Single Point of Access (SPOA), Committees on Special Education (CSE); and the OCFS Region II Pilot, among others. Interviews with stakeholders, including families, and child-serving systems, indicated there is no consistent local interagency process used to ensure that all child-serving stakeholders have collaborated on a plan of care to ensure that:

Social Services Law, Article 10-C, Part 483-d charges the Committee with "establishing model processes for the placement of any child in an out-of-state congregate residential program or residential school which may include, but not be limited to, identifying the necessary activities that should be engaged in on a local, regional and/or state level prior to making an out-of-state placement including reviewing alternative service options to avoid an out-of-home placement and reviewing all viable and least restrictive options for placing the child in-state".

- A thorough assessment of the child's needs is conducted prior to locating an out-of-state placement;
- All community and in-state options have first been exhausted and;
- The child is in the most appropriate and least restrictive setting.

Furthermore, it was learned that by the time an out-of-state placement is being pursued for the child, necessary services have become a matter of urgency and opportunities for collaboration have been lost.

Given these findings, the Committee developed a set of *Draft Accountability Guidelines* (Appendix A). These guidelines enumerate steps that key decision makers, including family members, need to take in order to assure that all options to maintain the child at home, in community and in the least restrictive setting have been attempted, and that when the only appropriate option is for the child to be placed out-of-state, a comprehensive, cross-systems plan of care is developed to meet the child's needs. The next step for the *Draft Accountability Guidelines* is articulating how it is to be implemented within and across each system, particularly at the county level.

3.2 Coordination with Related Initiatives

In addition to and in concert with the work of the Committee, there are other interagency and individual agency initiatives occurring that improve access to services for children at risk of out-of-state residential placement. These initiatives have helped inform the Committee's work and support its efforts to reduce out-of-state placements. Examples of such initiatives follow below.

<u>The Coordinated Children's Services Initiative (CCSI)</u>, like the Out-of-State Placement Committee, is formally codified in Council statute (Article 10-C, Part 483-c) with coordination of interagency initiatives managed by Council staff. CCSI participants include agency representatives from SED, OMH, OMRDD, OCFS, OASAS, DPCA, CQCAPD, the Developmental Disabilities Planning Council (DDPC), as well as family and youth representatives and the CCSI Statewide Director.

CCSI is an interagency initiative that supports localities in creating systems of care so children with cross-systems needs remain at home with their families and in their schools and communities. Children with cross-systems needs have, or are at increased risk for having, complex, co-occurring unmet medical, mental health, developmental, substance abuse, educational, social, vocational, or other needs that necessitate collaboration among multiple service delivery systems, families, and youth to create a comprehensive, coordinated system of care. A more detailed look at the activities of CCSI can be found in Appendix D.

<u>Children's Single Point of Access (SPOA)</u> - Coordinated by the Office of Mental Health, the Children's SPOA serves to identify those children with a primary mental health diagnosis at the highest risk of placement and to develop appropriate strategies to manage those children in their homes and communities. Since its inception in 2000 over 33, 417 children have been referred through the SPOA process.

The Children's SPOA process is operational in all New York State counties and in New York City. Over 80 percent of SPOA processes statewide utilize an evidence based assessment instrument to guide the determination of the child's and family's strengths and needs and to assist in a comprehensive plan of care.

The involvement of other child-serving systems in the SPOA process has facilitated greater collaborative planning for children who are high risk/high need. As many as 60 percent of children referred to the SPOA process are involved with other child serving systems including: Committees on Special Education, Probation, Departments of Social Services, Developmental Disabilities and others. SPOAs report that these and other child-serving stakeholders are involved in planning for the individual child and family locally. Estimates indicate that up to 93 percent of children who go through the SPOA process are able to avoid hospitalization or placement.

Other positive outcomes that have resulted from the SPOA process include:

- a reduction in time from referral to receipt of services;
- an increase in the proportion of high-need children receiving priority services;
- earlier intervention to prevent future high-risk behaviors, due to the emphasis on collaboration with all child-serving stakeholders including families;
- better planning to assure that children and families are comprehensively served; and
- planning for treatment around specific behaviors, so that a child may return to the community from more intensive placement more quickly and with a comprehensive plan of care on return.

<u>The OCFS Region II Collaborative Assessment Project</u> is a project recently implemented within the eight county region surrounding Rochester in western New York. The purpose of this cross-system assessment is to build a thorough understanding of the strengths and needs of children in the context of their families. This model has been in operation since June 2006. Individual assessments are conducted by experts in the medical, psychiatric, family systems and support, educational, psychological, and psychosocial areas, and the model is designed to include other specialties as necessary. An evaluation of the project is currently underway. Based on the findings, this project may serve as a model for implementation in communities across New York State.

Challenges

Need to Strengthen and Streamline Access to Community and Residential Services for Children at Risk of Out-of-State Placement

• Consistency of Models across Counties: Many programs and initiatives have been designed and implemented by individual or multiple state human services agencies with the goal of improving

services, family participation, and care coordination for children with cross-systems needs. Many counties have created their own structures to administer these and other state and federal level initiatives, and to implement their own locally designed systems for managing an ever-changing array of services and supports for children. However, these efforts vary greatly across service system and county boundaries. This variation is not limited to the intended target populations of existing collaborative models (e.g., SPOA, PINS diversion) but also in terms of their cross-systems authority to effect and sustain change across multiple systems. Such lack of consistency, combined with a sense of ownership for specific individual initiatives, creates barriers to children and families accessing services at a single point of entry. At a January 30, 2007 meeting of OSP Work Group members and representatives of various nongovernmental organizations, the idea of promoting the Coordinated Children's Services Initiative (CCSI) as the single state-level model was advanced. However, this issue has yet to be presented to the Committee and consensus that there should be a single model has not yet been reached. The Out-of-State Placement Committee will discuss CCSI, along with other models, before advancing a recommendation.

- Management of Services Tied to Funding Sources: At the national, state, and local levels, services are delivered and oversight agencies are organized largely around funding sources and the specific diagnoses or legal status of the children each individual system is designed to support. The categorical nature of funding and service delivery has created systemic barriers in meeting the needs of children who require supports from multiple service systems. A child and family's needs are often best met by accessing services in a range of service environments (in their homes, schools, community settings, and/or out-of-home placements) that are delivered and reimbursed by several different service systems. However, the varying eligibility requirements for accessing specific funding and supports may inhibit greater access. The OSP Committee will explore existing models of blended funding and evaluate their ability to be replicated in other counties.
- Lack of Coordinated Cross-Systems Planning: The need to develop and implement coordinated, cross-systems planning for comprehensive children's services is a critical component in the successful implementation of the *Draft Accountability Guidelines* and the long-term planning for addressing the needs of children who may be at risk of out-of-state residential placement. Planning across systems at the county level is fragmented, due to the lack of active participation by key systems, the reactive nature of placement decisions (the need to get a placement v. the need to have a comprehensive service plan for each child at risk), the lack of shared resources or shared data, and the limited role of youth and family members in a leadership capacity at the table. The OSP Committee can serve as a future model for cross-systems planning, especially in the management of data, articulation and measurement of shared outcomes, and the strengthening of the in-state infrastructure. Also, at the state level, the Committee will need to address, document and track real and perceived barriers to cross-systems planning to make sure that children receive the most appropriate level of care for their complex needs.
- Need for Coordinated Assessments: Children with complex or cross-systems needs must have comprehensive screening and assessment that addresses the following domains: health, mental health, substance abuse, education, development, and social/adaptive functioning, among others. The difficulty with the current process is that children may be exposed to different assessments from different systems without the benefit of stakeholders of each system sharing or having access to the information from the other systems. In developing the *Draft Accountability Guidelines*, the Committee has included and will expand on language that expresses the need for either comprehensive or coordinated assessments. The challenge for the Committee is to

recommend or streamline a process where assessment is coordinated and comprehensive but not burdensome to the children and the families. In the next year, as the Committee builds on its *Draft Accountability Guidelines*, it will examine how assessments are currently implemented, look at best practices for coordinating assessment, and recommend ways to improve this process.

- Improvement in Transition Planning: Within the children's residential care system, children make transitions from one level of care to another, from residential to community-based services and from children's services to the adult services system. Effective transition planning is a critical process necessary so that children receive appropriate services in a timely manner. While there are processes in place, there are times, particularly when children age out and leave a children's out-of-state facility to return to New York, when transition planning has not been done or has not been done effectively. The Committee will review existing laws and regulations addressing transition planning, analyze barriers to effective implementation, and develop recommendations to improve the process.
- Issues Specific to New York City: In every locality, there are organizational and institutional dynamics that complicate the coordination between human services systems and the education system. Committees on Special Education are organized by school districts, which do not always align with county/borough- or city-level children services. The evolving infrastructure of the educational system in New York City, which serves over 1 million children, is a key example of this dynamic. In its examination of how placement decisions are made, the Committee needs to more fully study the unique and continuously evolving organization of the New York City educational system, especially in terms of its school districts and regional Committees on Special Education, which operate very differently from the rest of the State. The Committee will work with representatives of the city and state education departments, as well as stakeholders in the community, including family members, to determine how best to promote and implement the *Draft Accountability Guidelines* and identify what technical assistance and services would be needed to work towards fully exploring and maximizing community-based services and in-state placement options for New York City children at risk of placement out of state.

RECOMMENDATION 2: AMEND SECTION 483-D, OF ARTICLE 10-C IN THE SOCIAL SERVICES LAW TO INCLUDE THE DIVISION OF THE BUDGET, COMMISSION ON QUALITY OF CARE AND ADVOCACY FOR PERSONS WITH DISABILITIES, REPRESENTATIVES OF THE FAMILY COURT SYSTEM, THE CCSI STATEWIDE DIRECTOR, AND FAMILY AND YOUTH REPRESENTATIVES AS MEMBERS OF THE OUT-OF-STATE PLACEMENT COMMITTEE.

Rationale: Representatives of the Division of the Budget, Commission on Quality of Care and Advocacy for Persons with Disabilities, the CCSI Statewide Director, and family liaisons currently serve as active and valuable contributors to the deliberations of the Committee. To guarantee continued involvement, it is recommended that these participants, in addition to representatives of the Family Court System, become members of the Committee by amending the current statute. Division of the Budget is critical to any discussion of funding an in-state infrastructure; the Commission on Quality of Care and Advocacy for Persons with Disabilities works with state agencies to monitor the quality of care in residential facilities and investigates incidents of abuse or misconduct in both in- and out-of-state facilities; Family Court judges have the authority to send a child to an out-of-state residential placement; and family representatives are responsible for offering counsel to the Committee. The CCSI Statewide Director will serve as the direct liaison for CCSI with the Out-of-State Placement Committee and support the coordination of relevant activities between the two committees.

Conclusion

The Out-of-State Placement Committee was charged by statute with addressing concerns around children whose needs require intensive, coordinated and cross-systems services. The Committee acknowledges that work focusing on these children must continue and that policies, programs and reforms must be recommended, developed and implemented in a systemic manner.

This report recognizes the work and effort of the Committee, Work Group and Subcommittee participants, as well as the input of family members and non-governmental stakeholders engaged in the process during the year. A commitment by stakeholders at the state, regional and local levels is necessary to reduce and prevent the number of children who are served in out-of-state residential schools and facilities. Sustaining a long-term reduction and prevention of out-of-state residential placements is only possible within the context of promoting a statewide system of care. This means enhancing the infrastructure to establish a continuum of services, from home and community based services to residential care that address the needs of individuals and engages the family and all relevant stakeholders in the process.

Leadership is essential as service systems seek to better align with one another, guided by the needs of the families they serve. During the next year, the Out-of-State Placement Committee will continue its commitment to focus on the reforms necessary to achieve a coordinated, accessible, more effective and responsive system of services for New York's children and families.

APPENDIX A

DRAFT Accountability Guidelines for Out-of-State Referrals by Local Education Agencies, Local Departments of Social Services and Administration for Children Services ¹

The following *Draft Accountability Guidelines* define per the statute, the framework for a model process to guide local education agencies and local departments of social services in placement decisions for children and youth who may be at risk of out-of-state residential placement.

Children enter the child-serving system at various points in the treatment spectrum and with varying needs and supports. Depending upon the point at which the child enters the system the particular system that the child is first referred through, and the treatment provider, that the child and family are known to first, decisions regarding treatment needs and placement issues may vary. It is also understood that there are factors outside the control of any particular agency which may influence the decision to place a child (e.g., emergency placement, family court decisions, etc.).

There are already local education agencies and local departments of social services who as a best practice integrate many of the steps of the *Draft Accountability Guidelines* into their own placement processes and who work collaboratively with other agencies and systems such as family court, mental health, developmental disabilities, schools, child welfare, probation, substance abuse treatment and others. These *Guidelines* are intended to promote a model process more consistently across the state and across systems. It is the hope of this Committee that those local education agencies and local departments of social services who already integrate these steps into their referral processes will support the efforts, including those of other communities who might require technical assistance; and those within their own systems of care.

Within the *Draft Accountability Guidelines*, each local education agency and/or each local department of social service is asked to consider the following steps so that all efforts to maintain a child in the least restrictive, most integrated setting have been made and that an out-of-state residential placement is the only remaining viable option for the child in order to address the individual child's needs. The steps are as follows:

- Obtain comprehensive placement history (all levels of out of home placement both in state and out-of-state) to better understand what treatment practices and experiences have worked or not worked in the past. This information may include all levels of placement that have been provided, and contacts with previous treatment providers (community and residential) to get a comprehensive history.
- 2. Consult with families to obtain a history and engage them in treatment as follows:
 - History of placements
 - Assessments done to date and when.
 - Timeline of treatment
 - Family's view of child's strengths and needs

¹ Draft Accountability Guideline #5 is expected to be substantially enhanced and submitted to the OSP Committee after publication of this document.

- Family's view of their strengths
- Parental view of which specific areas require treatment for child to return home or remain home with them.
- 3. Obtain current Assessments / Evaluations (definition of current within one year), including: a. Psychiatric; b. Physical; c. Psychological; d. Social; e. other specialized assessments as indicated by diagnosis and functional level.
- 4. Continue to engage family including parents and child (whenever possible) in understanding what services are available in state to meet the child's needs. Encourage their participation in planning for their child. This should include securing their Consent to Release Information to all involved parties.
- 5. Collaborate with appropriate County and State agencies (school districts, social services, OMRDD, OMH, probation, substance abuse treatment, courts and others) so that children are served in the least restrictive environment possible to meet their needs. This collaboration includes consultation with a locally designated cross-systems planning body as determined by the chief executive of each county/borough. Examples of such collaboration may include the local Single Point of Access, Coordinated Children's Services Initiative or a CSE meeting with local stakeholders and family. The charge of this designated effort would be to develop a comprehensive, cross-systems plan of care that includes collaborative decision making and involves other child-serving systems including mental health, developmental disabilities, school, probation, child welfare, families, youth and other relevant systems. The resulting cross-systems plan would indicate all possible options tried to maintain the child in community. When community and/or home placement is not an option, the plan should indicate what resources are not available to sustain the child in the community (why community placement would not work). Where there is not clarity as to treatment needs and diagnosis, a referral to a diagnostic center might be considered prior to making a referral for placement.
- 6. Refer children who are eligible for potential out-of-state placements to a central point, (to be determined) which will assist with recommending in-state agencies that might be appropriate but to which referrals were not made. (NOTE: for some children, an out-of-state placement is geographically closer than an in state placement would be. Any child whose out-of-state placement is within one hour of his parental home is exempt from this requirement.)
- 7. Develop clear statements about what individual child needs that cannot be provided in NYS; what needs to happen in order for the child to return home or to a lesser restrictive setting; and a plan (with activities and dates) to return child to NYS as soon as practicable.

APPENDIX B

DRAFT Evaluation of Out-of-State Residential Facilities for Inclusion on Individual and Comprehensive Registries

Following are the procedures to take and criteria that must be met for an out-of-state congregate residential program or school to be compliant with the core requirements for placement on individual agency or comprehensive out-of-state registries.

Core Requirement 1: "It holds a current license or charter from the appropriate state agency or agencies of the state in which the program or facility is located." The New York State agency will maintain the most current documentation of licensure and accreditation.

- The services provided by the out-of-state program or school to New York children must be licensed, certified or chartered to the extent required by the pertinent host state agency, including additional, outside accreditation if required
- The out-of-state program or school must provide a current and any amended or extended license, operating certificate or charter to the NYS agency that is evaluating the program prior to acceptance into an out-of state registry
- If the program or school is directly operated by the host state, that state must certify that the program or school is operated in accordance with applicable laws and regulations

Core Requirement 2: "Appropriate laws and regulations exist in the state where it is located for the investigation and resolution of allegations of abuse or neglect." These laws and regulations must include the following provisions:

- The NYS agency that is evaluating the out-of-state program or school must receive written documentation of host state child abuse and maltreatment laws and regulations for review and maintain the applicable documents on file. The out-of-state program or school must certify that the laws and regulations provided are current and must advise the NYS agency of any changes to such laws and regulations. This review need only be done once per state, provided, however, the NYS agency may request the out-of-state program to provide changes in laws and regulations enacted since the previous New York evaluation.
- Host state laws or regulations must define and register allegations of child abuse and neglect for investigation
- Host state laws or regulations must provide that individuals over 18 employed by, volunteering
 in, or providing services to the program or school are possible subjects (perpetrators) of child
 abuse or neglect reports
- Host state laws or regulations must require an immediate and thorough investigation of alleged abuse or neglect by an independent party other than the out-of-state program or school
- Such investigation must include an evaluation of the environment of the child named in the report, a determination of the risk if the child continues to remain in the existing environment, and continuous assessment of safety throughout the investigation
- Host state laws or regulations must have appropriate remedies to protect the child and other children in the program or school from future abuse or neglect.
- Host state laws or regulations must require a determination within a specified timeframe as to whether the allegations of abuse or neglect are substantiated and the basis for the substantiation.
- The program or school where the NYS child is placed must have laws, regulations or policies to conduct background checks of individuals volunteering or applying for employment.

• The program or school where the NYS child is placed must agree to immediately notify the placing NYS agency or school of any report of suspected child abuse or neglect regarding the child, actions taken in regard to the report, and confirm that the parents of the child will be informed by the appropriate investigative agency, consistent with the confidentiality standards of the State in which the program or school is located.

Core Requirements 3: "The out-of state program or school has been evaluated by the applicable New York State agency or agencies and the types of care being provided are consistent with New York State law and the applicable agency's regulations." State agencies that will be involved in this review are determined by their respective expertise in the population served and services provided. Agencies may include but are not limited to: Office of Children and Family Services (OCFS), State Education Department (SED), Office of Mental Health (OMH), Office of Mental Retardation and Developmental Disabilities (OMRDD), Office of Alcohol and Substance Abuse Services (OASAS), and the Council on Children and Families (CCF). The following criteria must be met:

- Written policies are provided to New York State that details the type of care given residents, as specified below.
- Documentation is received from the out-of-state program or school that details the number and types of individuals served, the treatment and educational model and philosophy implemented, and the organizational structure of the agency.
- The out-of-state facility must submit an annual fire safety inspection report demonstrating compliance with the fire safety standards of the State in which the program or school is located.
- The out-of-state school or program has a written plan detailing procedures to be followed in the event of an emergency or disaster.
- Staffing is adequate to address the needs of the residents for supervision, safety, clinical treatment, and behavioral support at all times and in all settings
- The health needs of residents are met through documented policies and practices for the assessment and treatment of physical health, developmental, dental, mental health, and substance abuse concerns.
- The educational services are appropriate and the child's individualized education plan (IEP) is implemented.
- The residential program provides appropriate leisure activities and planned recreation, including sports and cultural activities.
- The policies and practices implemented at the program or school comply with all applicable New York State laws and regulations on restraint and crisis intervention. Applicable laws and regulations are those that would otherwise apply if the program or school and population were located in New York State.
- The program or school will not discriminate against any residents because of race, creed, color, national origin, gender, disability, or sexual orientation.
- The program or school facilitates regular parental contact and visitation consistent with any court ordered limitations.
- The program or school has clearly articulated standards for assessment and service planning
- The program or school has clearly articulated policies to work collaboratively with the custodial county or placing school district in NYS for a successful transition home or to another living arrangement.
- The out-of-state program or school must agree to immediately report the death of any child in
 the program or school to the designated office within the applicable New York State agency(ies)
 and such notification must include the contact information for the appropriate licensing,
 certifying or chartering agency in the state where the program or school is located. The out-ofstate program or school is not required to identify the child by name.

Core Requirement 4: "It has received at least one member of the out-of-state placement committee or his or her designee for a site visit of such out-of-state congregate residential program or residential school, as appropriate."

- NYS staff conducting announced and unannounced site visits must be allowed to inspect all parts of the physical facility, interview staff and review written policies.
- NYS staff conducting site visits must also be allowed to interview children from New York who
 are placed in the program or school and to review documentation concerning such children
 maintained by the program or school
- If no children from New York are currently placed at the school or program, NYS staff conducting the site visit must be allowed to review documentation policies, standards, and templates.

Appendix C

DRAFT Interagency Process for the Evaluation of Out-of-State Residential Programs and Schools

Initiating the review

- 1. This interagency process must be used to evaluate out-of-state (OOS) programs or schools upon establishment of the New York State Comprehensive Registry. Programs and schools approved prior to the establishment of the Comprehensive Registry will be so identified.
- 2. The process to add a new OOS program or school to the Comprehensive Registry is initiated and managed by the New York State agency with oversight of the local department of social services (LDSS) or local education agency (LEA) using or planning to use the out-of-state resource. This will be the New York State lead agency.
- 3. Additional OOS programs and schools will not be considered for inclusion on the Comprehensive Registry without a request.
- 4. The local agency must follow the "model process" to secure services for the child prior to considering an OOS resource for the child.
- 5. The out-of-state provider submits a written request to the lead agency for inclusion of the resource on the Comprehensive Registry.
- 6. After the lead agency determines that the request is appropriate, the interagency review process is initiated.

Review Process

- 1. New York State lead agency obtains state level documents from internet or host state:
 - a Proof of certification/licensure/charter, unless already in the possession New York State
 - b Statutes and regulations on child abuse and neglect
 - c Copies of host state monitoring/licensing reports
- 2. New York State lead agency obtains program/school level documents from the out-of-state facility. Documents should address the items in the Core Requirements checklist; they may include internal policies, memoranda, and training curricula for staff. "Promotional" materials, including descriptions on the OOS facility's website, are insufficient.
- 3. New York State lead agency conducts desk review of documentation received. Documentation is forwarded to other New York State agencies for review, as appropriate.
 - a Minimally, both OCFS and SED must review relevant materials on each program/school.
 - b If SED has already approved the school, their review may be minimal or waived.
 - c Additional New York State agencies will be asked to review materials depending on the types of children served and the programs offered. For example, if the program is designed for children with significant developmental disabilities, OMRDD will be asked to participate in the review.
 - d Additional information may be requested
- 4. A meeting is held with the New York State agencies involved in the desk review to strategize the site visit (may be held before desk review is completed). Decisions are made as to which agencies will participate. At a minimum, the lead New York State agency will participate. Both SED and OCFS will generally participate unless they have recently visited the site. Additional New York State agencies will participate as needed.
- 5. Site visit scheduled by lead New York State agency and completed.
- 6. De-brief and discussion by New York State agencies that participated in site visit and/or reviewed documentation.
 - a Comparison of findings and impressions from desk review and site visit with the Core Requirements detailed checklist

- b Determination as to whether out-of-state program/school has met Core Requirements for inclusion on individual and Comprehensive Registry.
- c Additional recommendations, particularly if New York State children are already placed in the facility, may include identification of concerns and request for a corrective action plan, and suspending new intakes from New York State or not providing public funds for the placement.
- 7. Recommendation report completed by lead New York State agency.
- 8. Inform the OOS facility of decision to include, request a corrective action plan, or exclude from New York State Registry.
- 9. Update CCF website with status of program/school. Create entry for updates and informationsharing among New York State agencies

Periodic Review of Out-of-State Programs/Schools on Comprehensive Registry

- 1. New York State agencies maintain regular contact with LDSS/LEA as to their experiences and satisfaction with out-of-state programs/schools.
- 2. Any experiences of note (e.g. death of a child, substantiated abuse or neglect of a New York State child, identified expertise in a specific disability) are documented by the state agency in a location and method to be determined, maintained by CCF
- 3. Host state is contacted to discuss any new information on the program/school and review their monitoring reports.
- 4. Every 3 years New York State agencies repeat the interagency evaluation process to determine if the out-of-state school/program will continue on the comprehensive registry.
- 5. If no New York State children have been placed in an out-of-state school/program in the past 24 months, status on the comprehensive registry changes to Inactive. An Interagency Review is required before a child from New York State may be placed there.

APPENDIX D

THE COORDINATED CHILDREN'S SERVICES INITIATIVE (CCSI)

The Coordinated Children's Service Initiative (CCSI) promotes a set of core principles at all levels of government, across a broad range of service agencies, and throughout the service planning and delivery process. These principles guide a process of integrated planning that develops and delivers individualized services to children and their families. The process utilizes strength-based, culturally competent approaches to identify and meet a child and family's needs, consistent and meaningful family and youth involvement, individualized planning, and encourages creative, flexible decision making and funding strategies.

The CCSI principles and practices lead to coordinated systems of care that:

- Develop individualized child and family plans that are based on individual needs, not program categories;
- Emphasize supports and services in family, community, and school settings;
- Reduce over-reliance on restrictive and expensive out-of-home placements;
- Develop family/professional partnerships at all levels of service planning and delivery;
- Use strength-based approaches that focus on child and family strengths as opposed to problems or pathology;
- Deliver services that are culturally competent; recognizing that a family's cultural background can affect the determination and delivery appropriate services; and,
- Provide unconditional care to all in need regardless of how, when, or where they come in to the human services system.

These principles and practices are promoted through a three-tier structure of state, county, and child and family team-levels that promote coordinated service delivery at the appropriate level of care:

- Tier I is a local service planning team that accepts referrals and develops individualized, strength-based plans of action for children and their families.
- Tier II includes county government and service agency leaders, school officials, and family representatives to address local and state-level solutions to cross-systems issues. New York City's CCSI also includes a city-wide team of officials, family, and systems representatives.
- Tier III is a statewide board made up of family and youth representatives and officials from nine state agencies. Tier III meets regularly to review and implement systems change at the state level.

Key Tier III Activities include:

<u>CCSI – Family Partner Training Project</u> supports a family designed and implemented training curriculum that includes the history and background of CCSI; its principles; the role of family partners; advocacy skill-building; strength-based assessments; understanding the child and family service systems; collaboration; support group facilitation; and self-care for the family partner.

<u>CCSI Statewide Wraparound Training Project</u> covers the history; background; and framework of CCSI as well as the ten principles and four phases of the wraparound process as defined by the National Wraparound Initiative (www.rtc.pdx.edu/nwi). To provide the training, efforts are underway to develop a statewide CCSI training network. Trainer pairs, that must include a family or youth co-trainer, will complete a train-the-trainer curriculum to sustain and expand the number of CCSI-trained wraparound facilitators. A comprehensive evaluation of this training project has been designed to examine the impact of using the wraparound process on child and family functioning and service systems outcomes. A report on the evaluation is expected near the end of 2007.

<u>Regional Technical Assistance Teams</u> is a structure within CCSI. The purpose of the five Regional Technical Assistance Teams (RTATs) covering all New York State is to provide technical support for localities through from member state agency regional staff participating on CCSI, family organizations/advocates, and county-level staff. To elevate and coordinate the important work of the RTATs, CCSI has enhanced its support for the teams and is working with regional stakeholders to strengthen regional activities and structures.