

LOCAL LAW 41 of 2016:
2019 ANNUAL REPORT

NEW YORK CITY ADMINISTRATION FOR CHILDREN’S SERVICES
DEPARTMENT OF YOUTH AND COMMUNITY DEVELOPMENT

A. INTRODUCTION

Local Law 41 of 2016 requires an annual report to the Speaker of the City Council, documenting the number of youth in contact with DYCD and ACS “who are referred as, self-report as, or who the department (DYCD) or ACS later determines to be sexually exploited children, disaggregated by age, gender and whether the children had contact with either DYCD or ACS or both agencies.” The law also requires DYCD and ACS to provide a “description of the services provided by the department and ACS to meet the needs of youth who are or have been sexually exploited.” Lastly, the law requires DYCD and ACS to document their methods for collecting data regarding this population.

The New York City (NYC) Administration for Children’s Services (ACS) and Department of Youth and Community Development (DYCD) are jointly submitting the fourth annual report on Local Law 41. This report covers Calendar Year 2019 (“2019”) and contains the following information as required:

- A. The number of youth in contact with the department’s (DYCD’s) runaway and homeless youth services or ACS who are referred as, self-report as, or who the department (DYCD) or ACS later determine to be sexually exploited*
- B. Data disaggregated by age, utilizing the following ranges:*
 - a. under 12 years old;*
 - b. 12-15 years old;*
 - c. 16-18 years old; and*
 - d. over 18 years old;**and disaggregated by gender, and by whether such children had contact with the department or ACS.*

- C. The number of sexually exploited children identified as having received services from DYCD and/or ACS.*
- D. A description of services provided by DYCD and ACS to meet the needs of youth who are or have been sexually exploited children including but not limited to the number of beds designated for such children and the types of mental health and health services provided to such children.*
- E. The methods DYCD and ACS utilized to collect data regarding the number of sexually exploited children.*

DATA SUMMARY

Table 1. Youth referred as, self-reported as, or determined to be sexually exploited or at-risk for sexual exploitation served by ACS and DYCD in 2019:	
Safe Harbour Providers	1,146
DYCD Runaway and Homeless Youth Services	623
ACS Prevention Services • Non-Advocate Prevention Cases - 151 • Advocate (ADVPO) Cases – 27 • Family Assessment Program (Advocate) Cases - 87	265 ^{i, ii}
ACS Placement Services	22
Office of Temporary and Disability Assistance (OTDA) Confirmed Victims of Human Trafficking	115 ⁱⁱⁱ
Total Exploited or at Risk for Exploitation Youth Served in 2019:	2,171

In 2019, ACS, DYCD and the Safe Harbour providers served a total of 2,171 youth referred as, self-reported as, or determined to be sexually exploited, or at-risk for sexual exploitation.

It is important to note that the actual determination as to whether some youth are at-risk for exploitation, or have been exploited is significantly challenging. Many youth that are considered at-risk for exploitation may have actually been trafficked, but chose not to disclose that information, or even outright deny exploitation, despite a proliferation of indicators. Therefore, the data in this report captures both exploited youth and youth determined to be at-risk for exploitation and these categories cannot be disaggregated. It should also be noted that some youth may have been counted multiple times in street outreach and there may be overlap between provider data and victim confirmations by the NYS Office of Temporary and Disability Assistance (OTDA), whose information is confidential. There is no means to determine whether or how frequently this occurred.

Provider Breakdown:

Safe Harbour Providers Served 1,146 and OTDA Confirmed 151 Exploited Youth or Youth At-Risk for Exploitation:

- 60 youth who were exploited or at-risk of exploitation received services from the Safe Horizon Counselors who specialize in working with commercially sexually exploited children (CSEC) at ACS' Nicholas Scoppetta Children's Center.^{iv}
- 962 youth who identified as exploited, or at-risk for exploitation received services from Safe Horizon's Streetwork Outreach Team.^v
- The NYS Office of Temporary and Disability Assistance (OTDA) confirmed 151 youth ages 0 through 23 as sexually exploited.
- 99 newly identified sexually exploited youth, or youth at-risk for exploitation were brought to the attention of ACS' Child Trafficking Mailbox.^{vi}
- 25 newly identified sexually exploited youth were screened through ACS' Child Trafficking Database (CTDB).

DYCD Served 623 Exploited and/or At-Risk for Exploitation Youth Through Runaway and Homeless Youth (RHY) Programs:

- 330 youth received Crisis Services Programs.
- 95 youth received services from Transitional Independent Living Programs (TILS).
- 198 youth received services at Drop In Centers.
- 153 youth served by DYCD-funded providers shared that they also receive some form of service from ACS.
- 179 males; 343 females; 32 transgender males, 69 transgender females.
- 0 children ages 12 to 15; 111 children ages 16 to 18; 512 youth over age 18.

ACS Foster Care Placement and Prevention Services Served 164 Exploited and/or At-Risk for Exploitation Youth:

- Foster Care Placement: The Jewish Child Care Association's (JCCA) Gateways Program served 22 Sexually Exploited Youth in 2019.
- Prevention: Served 151 Sexually Exploited and/or Sexually Abused Youth at the Mt. Sinai-St. Luke's New Beginnings prevention program (New Beginnings). New Beginnings, which accepts referrals for children age 12 and up, works with sexually abused and/or sex trafficked youth and their families. New Beginnings worked with a total of 102 cases in 2019, 49 of which were new cases and 53 cases carried over from 2018. The 102 cases contained a total of 244 children (subject child and siblings), including 93 children under 12 years of age. Since the program serves subject children age 12 and older, it is likely these are siblings of the subject children, not subject children themselves. Therefore, the 93 children under age 12 have not been included in the total for New Beginnings.

**Table 2. Delineation of Data by Required Local Law
41 Categories: Total = 2,171**

By Age:	Under 12 years old:	7
	12 to 15 years old:	218
	16 to 18 years old:	355
	Over 18 years old:	1,476
	Age unknown ^{vii}	1
By Gender:	Male:	476
	Female:	1,130
	Transgender Female:	386
	Transgender Male	50
	Gender Non- Conforming	1

	Gender Undisclosed ^{viii}	14
By Contact With DYCD or ACS:		
ACS only		364
DYCD only		470
Both ACS and DYCD		153
Unknown		1,070
Advocate Cases (no age or gender data provided)	Prevention Services	27
	Family Assessment Program	87

B. DATA CAPTURE METHODOLOGY

In 2019, ACS obtained demographic data of young people served by New York State Safe Harbour-funded programs from the ACS and DYCD Safe Harbour providers. In addition, ACS obtained data through its Child Trafficking Mailbox, which served as a vehicle for ACS and provider agency staff to send notifications of trafficked children, ask questions, request resources and receive case practice guidance. The Child Trafficking Mailbox is monitored by seven professionals^{ix} within or affiliated with the ACS Office of Child Trafficking Prevention and Policy, who have extensive experience in child welfare and law enforcement. In 2019, the Child Trafficking Mailbox received 2,536 emails, which identified a total of 99 children who were newly identified as trafficked, or at-risk of trafficking, and also provided support in reference to 180 youth, all of whom had previously been identified as trafficked.

Screening Tools

In 2019, ACS continued to implement the NYS Office of Children and Families (OCFS) Administrative Directive, 15-OCFS-ADM-16: Requirements to Identify, Document, Report and Provide Services to Child Sex Trafficking Victims (September 1, 2015), with its mandated screening and reporting tools:

- a. Rapid Indicator Tool to Identify Children Who May Be Sex

- Trafficking Victims or At-Risk of Bring a Sex Trafficking Victim
- b. Child Sex Trafficking Indicators Tool (also known as the “Comprehensive Tool,” a higher level of screening which follows when the Rapid Tool identified a child as at-risk for trafficking)
 - c. Law Enforcement Report of a Child Sex Trafficking Victim

It is highly likely that the mandated OCFS screening process, based upon the requirements of 2014’s federal legislation, The Preventing Sex Trafficking and Strengthening Families Act, which required screening of every child within the child welfare system for potential sex trafficking and timely reporting to law enforcement of any child determined to be sex trafficked, resulted in greater awareness of trafficked children being identified and served.^x Additionally, The NYS Office of Children and Family Services’ (OCFS) Safe Harbour Program continued to require the use of a standard Excel spreadsheet for data capture, which helps gather more complete and uniform statistics from providers than in prior years.

Staff and providers face challenges with using paper screening tools to report and document data about the children and youth, as paper tools cannot aggregate data, nor provide a longitudinal history of the evolution of a child’s entry into trafficking. For this reason, Phase I of the ACS Child Trafficking Database (CTDB) launched on February 15, 2017 and continued in use throughout 2019.

CTDB Phase I allows assigned staff to complete the mandated OCFS sex trafficking screening tools electronically, thereby alleviating the use of paper screening tools. CTDB Phase II commenced development during 2019, and launched on March 12, 2020. For Phase II, the CTDB had been enhanced to include a new services entry section for all youth who progressed to the comprehensive screening level, thereby permitting the longitudinal capture of service provision information for all youth identified as trafficked or at-risk for trafficking. Phase II also provides automatic report generation functionality, to provide data as required by the City Council and OCFS and to identify indicators relevant to understanding child trafficking in NYC’s child welfare system. This project will therefore permit large scale indicator identification, tracking,

data collection and aggregation of all youth identified as trafficked, or at-risk for trafficking through ACS' protective investigations and within the foster care, prevention and detention systems. Phase II will also provide extended levels of administrative access and area compliance report generation ability for divisional and agency managers and executives. A detailed description of the CTDB is included in Appendix C.

In 2019, CTDB Phase I electronic sex trafficking screening capability identified twenty-five (25) children at the Federal Definition of Trafficking level.^{xi} Additionally, the ACS Child Trafficking Mailbox identified a greater number of youth at the Federal Definition of Trafficking level (120 of 124 youth reported) than in prior years, and also provided guidance and resources for 180 youth previously identified at the Federal level. The increased number of youth identified at the Federal level (rather than at-risk for trafficking) in 2019 illustrates the greater awareness of trafficking recognition and indicator relevance by ACS staff.

Table 3: Summary of 2019 Data Collected by the Office of Child Trafficking Prevention and Policy Through the Child Trafficking Mailbox and the Child Trafficking Database (CTDB):	
# Newly Identified Youth to the Child Trafficking Mailbox in 2019	99
# Newly Identified Youth to the CTDB in 2019	25
# Newly Identified Youth to Both the Mailbox and CTDB in 2019 (documented as CTDB only to avoid duplication)	(16)
Total Number of Newly Identified Youth to OCTPP in 2019 (Child Trafficking Mailbox <u>and</u> CTDB):	124
# Youth Identified at the Federal Definition of Trafficking Level in 2019	120
# Youth Identified as At-Risk for Trafficking in 2019	4
# Previously Identified (prior to 2019) Federal Definition Level Youth Involved in 2019 Emails to the Child Trafficking Mailbox	180
Total Number of Emails to the Child Trafficking Mailbox	2,536^{xii}
Total Number of Federal Definition Level/Trafficked Youth Involved in 2019 Emails to the Mailbox	300
Total Number of At-Risk Youth Involved in 2019 Emails to the Mailbox	4

Based upon the data collected from our providers and experience working with this population, ACS submits the following observations:

- Obtaining all the figures required by Local Law 41 from vulnerable youth can be challenging. For example, providers such as Safe Horizon's Streetwork Project, which conducts momentary outreach with many youth at one time, may be unable to obtain complete information from their participants. In other instances, asking youth information concerning their involvement with ACS may not foster rapport or may trigger painful feelings.
- In addition, it can be difficult, if not impossible, to ascertain whether youth identified through Streetwork were counted more than once, or if information provided in a later month related to a new or existing client.

This is due to the anonymity involved in street outreach and drop in centers. ACS is working to enhance data collection whenever possible.

- Most importantly, youth do not always disclose their experiences.

Therefore, many youth who are considered at-risk for trafficking may have actually been trafficked but choose not to disclose that information. There are a variety of reasons as to why a youth may not disclose. These reasons can include, but are not limited to:

- Traumatic reaction due to thinking about the victimization endured
- Fear of threats or retribution by the trafficker
- Fear of being taken from familiar people or places
- Embarrassed by, and ashamed of the exploitation and the abuse
- Cultural norms that may make talking about exploitive experiences difficult for children, and even more so, traumatic sexual experiences
- Developmental delays that make it difficult to conceptualize what has actually occurred
- Victims often do not recognize they are in an abusive relationship and do not identify as trafficked. They truly believe their exploiter loves them and become “trauma bonded”^{xiii} to the exploiter. This makes it difficult for them to disclose. Many victims who leave their exploiter return. Some never disclose or leave at all.

Table 4. Data Delineation by Agency and Indicator:

An expanded view of this table is located in Appendix B.

NYC Administration for Children's Services																
2019 NYC Safe Harbour Data: Exploited Children and Children At-Risk of Exploitation																
as reported by ACS, DYCD and Safe Harbour Providers																
Safe Harbour Provider	Total Youth	Cis M	Cis F	Trans F	Trans M	No G Discd	GNC	<12	12-15	16-18	>18	Age unk	ACS only	DYCD only	ACS+DYCD	Unk
Child Trafficking Mailbox	99	4	92	2	1	0	0	0	40	53	6	0	99	0	0	0
Child Trafficking Database	25	2	23	0	0	0	0	2	6	17	0	0	25	0	0	0
Children's Center Counselors	60	0	55	2	2	0	1	0	23	35	1	1	60	0	0	0
DYCD RHY Programs	623	179	343	69	32	0	0	0	0	111	512	0	0	470	153	0
Safe Horizon Street Outreach	962	242	378	313	15	14	0	0	0	51	911	0	7	0	0	955
OTDA Confirmations (0 - 23)	115	18	97	0	0	0	0	5	27	40	43	0	0	0	0	115
Gateways Program (Placement)	22	0	22	0	0	0	0	0	13	7	2	0	22	0	0	0
New Beginnings (Preventive)	151	31	120	0	0	0	0	0	109	41	1	0	151	0	0	0
Preventive Advocate Cases	27	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Family Assessment Program	87	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Totals:	2171	476	1130	386	50	14	1	7	218	355	1476	1	364	470	153	1070
Section Totals:				2,057						2,057				2,057		

Preventive Advocate Cases: 20 youth screened as Medium Risk and 7 youth screened as High Risk. No youth identified at the Federal Level, so no demographics provided.

Family Assessment Program Advocate Cases: 70 youth screened as Medium Risk and 17 youth screened as High Risk. No youth identified at the Federal Level, so no demographics provided.

New Beginnings served a total of 244 children ages 0 through 18+. 93 children were under the age of 12. Since the program serves subject children age 12 and older, it is likely these are siblings of the subject children, not subject children themselves. Therefore the 93 children under age 12 have not been included in the total for New Beginnings.

OTDA collects data on confirmed victims of all ages, but only data from ages 0 to 23 was used as 23 is when all youth would have exited the child welfare system.

D. SERVICE PROVISION FOR SEXUALLY EXPLOITED YOUTH

1. DYCD Contracted Programs and Services to Meet the Needs of Sexually Exploited Children

The central responsibility of DYCD is to administer city, state, and federal funds to community-based organizations that serve New York City's youth and families. DYCD funds a range of programs including immigration, after-school, literacy, jobs and internships, parenting, and runaway and homeless youth programs and services. In 2019, DYCD provided \$907.3 million in funding to support these programs and services.

DYCD's funded Runaway and Homeless Youth (RHY) services are designed to protect young people, and whenever possible, encourage family reunification. In cases where reunification is not possible, these programs help youth progress from crisis and transitional care to independent living arrangements. Youth who participate in DYCD-funded programs receive comprehensive services geared toward developing independent living skills, and strengthening their problem solving, decision making and communication abilities. This wide range of

services includes food and clothing; medical services; substance abuse education; housing assistance; educational services; counseling; independent living skills training; employment counseling and assistance; recreation; legal assistance; and transportation assistance.

Services are provided to at-risk youth through crisis services programs (serving youth ages 16-20^{xiv}) which offer emergency, voluntary short-term residential programs. Youth in need of longer-term residential services may obtain a referral through the crisis services programs to DYCD-funded Transitional Independent Living (TIL) programs (serving youth ages 16-20^{xv}), which assist youth in establishing independence through services such as educational and vocational programming, job placement, and counseling.

In 2006, DYCD revised its RHY model by establishing drop-in centers for each borough, enhanced street outreach services and specialized services for Lesbian, Gay, Bisexual, Transgender, and Questioning (LGBTQ) youth, pregnant and parenting teens, and sexually exploited young people, as well as expanded shelter options. Funded services are described in greater detail below. DYCD's aggregate data is provided in Appendix A.

- a. **Crisis Services** – Crisis services programs offer emergency shelter for runaway and homeless youth age 16 to 20. These voluntary, short-term residential programs provide emergency shelter and crisis intervention services aimed at reuniting youth with their families. If family reunification is not possible, crisis services programs help arrange appropriate transitional and long-term placements. In 2019, DYCD had available a total of 246 crisis beds, including specialized services for LGBTQ youth.
- b. **Drop-in Centers** – DYCD also funds emergency intervention services at seven drop-in centers across the five boroughs. Three drop-in centers are located in Manhattan and one each in Brooklyn, Queens, Staten Island, and the Bronx. Each borough has one 24/7 drop in center. These

programs serve youth ages 14 through 24^{xvi} with essentials such as food, clothing, and immediate shelter as well as access to counseling, support, and referrals to relevant services. Since 2015 DYCD has funded the Ali Forney Center to provide 24-hour drop-in center services at its Harlem location. In 2017, DYCD added Sheltering Arms to also provide 24-hour drop-in center services at its Queens location through non-Safe Harbor funding. In 2018, DYCD added Project Hospitality, SCO and Cardinal McCloskey to also provide 24-hour drop-in center services in Staten Island, Brooklyn and the Bronx respectively, through non-Safe Harbor funding.

- c. **Street Outreach Program** – DYCD also funds street outreach to reach at-risk youth where they are. Currently, the street outreach is conducted by the contracted provider, Safe Horizon’s Streetwork Project, with the use of vans. The Streetwork Project has been serving for over 35 years, is a confidential and voluntary program serving anyone who is 24 years old and under and homeless. The Street Outreach’s vehicle-based outreach program focuses on locations where youth are known to congregate. By going directly to where at-risk youth are likely to congregate, such as subway stations and transportation hubs, the Street Outreach Program, with the assistance of street outreach workers, develops rapport with youth and provides contact by disseminating information about RHY services, providing food, clothing and other resources; making referrals to other service providers; and transporting youth back to their homes or relatives, to crisis services programs, or to other safe locations.
- d. **Transitional Independent Living (TIL) Programs** – DYCD contracts with providers to offer a total of 428 Transitional Independent Living beds. In addition to the services that are offered to all youth in the RHY continuum, those who are specifically identified as sexually exploited and in need of specialized services can be referred to the nationally recognized Girls Educational and Mentoring Services’ (GEMS) Transitional Independent Living program, when appropriate. The GEMS TIL program specializes in services specifically for young women who

have experienced sexual exploitation. All young people residing in any of the DYCD funded programs will receive ongoing case management and counseling to address issues associated with exploitation. As each young person's experience is different, the service providers make referrals, as appropriate, to outside services. Program staff take care to engage youth in services when the youth is ready to address this sensitive issue.

New York State Safe Harbour-Funded Programs to Meet the Needs of Sexually Exploited Children

In 2019, New York State's Office of Children and Family Services (OCFS) provided \$88,900 in funding to New York City (NYC), so that NYC could continue to develop and implement a child welfare response to sex trafficking. This was the same amount as received for 2018, which was a significant reduction (238%) from the \$374,000 in funding received in 2017. In order to sustain the NYC Safe Harbour Program and continue equitable services to trafficked and at-risk youth, ACS self-funded the difference between the allotted amount and the amount needed to maintain the two Safe Horizon consultants at the Children's Center for the calendar year and to fund the Streetwork Program's street outreach for January through June. By doing so, ACS continued the ability to reach young people who are at risk of, or who are victims of sexual exploitation. The Safe Harbour grantees programs provided services to engage and educate exploited youth and assist with risk reduction. A summary of the services provided by each agency follows:

a. ACS' Office of Child Trafficking Prevention and Policy (OCTPP)

In 2015 ACS launched the Office of Child Trafficking Prevention & Policy (OCTPP), which works to raise awareness of trafficking and helps to identify appropriate services available to help youth at-risk and victims of commercial sexual exploitation and their families. In December 2017 ACS moved OCTPP from the ACS Investigations Unit to the Division of Family Permanency Services' Office of Older Youth Services (OYS), to enhance

linkage and communication with the foster care agencies, who often help identify trafficked youth via screening and casework. One example of the benefits of the move of OCTPP to OYS is that OCTPP is now leveraging resources by working closely and in coordination with other OYS programs that work with children and staff in residential foster care programs, the Intensive Preventive Aftercare Services for Child Welfare (IPAS-CW) Unit, and the Missing Children's Outreach unit (MCOU). OCTPP and IPAS-CW continue to work together to increase outreach and communication with trafficked youth and their case planners in residential programs and to provide on-site trainings to planners on how to use the Child Trafficking Database to screen youth. The Missing Children's Outreach Unit (MCOU), works with foster care agencies to help locate youth who leave their placements without consent ("AWOC") towards mitigating the risks of trafficking. OCTPP also works with the ACS Investigative Consultant team (comprised of former law enforcement personnel) who locates and returns these vulnerable youth.

OCTPP coordinates policies and procedures across NYC's child welfare agencies, manages the NYC Safe Harbour Program, provides consultation on cases, produces trainings and events, analyzes data, provides trafficking prevention group work, and maintains five e-mailboxes for communication with staff and external professionals on a variety of topics: Trafficking/At-Risk Cases, CTDB Issues, Training Requests, Tattoo Removal Referrals, and Female Genital Mutilation/Cutting Case Reporting. OCTPP also expanded its internal capacity during 2019, adding a third staff member, a Child Trafficking Specialist social worker to focus on congregate care cases, working with provider agencies on preventive measures and safety planning, providing groupwork for the youth, assessing individual cases to ensure trauma identification and an appropriate response to meet the identified needs.

In 2018, OCTPP developed "Movin' On": The NYC Child Tattoo Eradication Project and Network to assist trafficking victims and former gang members in positively moving forward with their lives through the provision of trauma informed tattoo removal and the provision of relevant support. In

2019, ACS developed youth focused palm cards advertising the tattoo removal service, translated them into twelve (12) languages, and posted a program descriptive video on YouTube.^{xvii} As a result, during 2019 OCTPP received twenty eight (28) tattoo removal inquiries, twelve of which completed the waiver requirement and were referred to licensed providers for removal or modification. Additional information on “Movin’ On” is available in section E (d).

In 2019, OCTPP expanded the its groupwork initiative, providing direct trafficking awareness groups to vulnerable youth at the Nicholas Scoppetta Children’s Center and at Residential facilities.

b. Safe Horizon

Safe Horizon, a leading service provider in the field of commercial sexual exploitation, provided two areas of service through the Safe Harbour grant. Two Licensed Master Social Workers (LMSW) worked as Commercially Sexually Exploited Child (CSEC) Consultants at the Nicholas Scoppetta Children’s Center. The social workers, who are employed through Safe Horizon’s Streetwork Project, screened and assessed youth for trafficking indicators, assisted staff in identifying exploited youth, engaged with and advocated for youth, and provided trafficking relevant service recommendations and referrals. In addition to their work with exploited children and other vulnerable populations, the consultants provided safe sex awareness groups for all youth and technical support for staff. During 2019, the social workers served 60 youth referred as, self-reported as, or determined to be sexually exploited or at risk for exploitation.

2019 Safe Harbour funding also enabled the continuation of street outreach to identify and support trafficked youth. Safe Horizon’s Streetwork Project’s Street Outreach Team provided the contact information for Safe Horizon social work staff, safer sex items, and a variety of essentials, including snacks, water, hygiene items, hats, scarves, gloves and hand warmers to 962 homeless youth, and youth on the street referred as, self-reported as, or determined to be sexually exploited. Since youth homelessness too often correlates with “survival sex,” where sex is used to meet basic survival needs such

as food, clothing, or shelter, many youth served may have been trafficked. Many youth are repeat contacts for street outreach, and the Team has continued to build a strong relationship with them.

2. ACS Contracted Prevention and Placement Programs to Meet the Needs of Sexually Exploited Children

In addition to services funded by the NYS Safe Harbour grant, ACS also contracts for specialized prevention and placement programs as part of its continuum of services for at-risk youth and victims of sexual exploitation.

a. Prevention: Mt. Sinai-St. Luke's New Beginnings Program

ACS contracts with Mt. Sinai-St. Luke's Roosevelt's New Beginnings program, which was designed to maintain youth ages 12–17 who are at-risk for sexual abuse and/or exploitation, or who are victims of sexual abuse and/or exploitation safely in their homes by providing intensive therapy to the youth and family members. The program also works with youth in foster care up to age 21, as well as with youth up to age 22 who have aged out of foster care.

In 2019, New Beginnings program worked with 102 families, 49 of which were new cases and 53 carried over from the prior year, with a total of 244 children (subject child and siblings). There were 93 children under 12 years old in 2019. Since the program serves subject children age 12 and older, it is likely these are siblings of the subject children, not subject children themselves. Therefore, the 93 children under age 12 have not been included in the data total for New Beginnings, instead documenting service for 31 males and 120 female youth ages 12 and up.

b. Preventive and Family Assessment Program Advocate Cases:

The ACS Division of Prevention Services obtained redacted sex trafficking screening data for Advocates Prevention Only (ADVPO) cases from its contracted preventive agencies. Similarly, ACS's Family Assessment Program, a Persons in Need of Supervision (PINS) diversion program obtained redacted ADVPO data from its contracted service providers.

ADVPO cases provide voluntarily requested services to prevention services and PINS diversion only clients (cases with no child in foster care or being referred to foster care and not under investigation or open indicated child protective services reports). ACS' contracted prevention and PINS diversion agencies do not transmit a breakdown of data on ADVPO cases beyond a total number of children and their risk levels. Children screened at the Federal Definition of Trafficking level are identified, but only by age, gender and borough. Advocate case sex trafficking screenings are not captured within the CTDB but are completed with paper templates. 2019 data provided by the ADVPO agencies identified:

- Preventive ADVPO Screenings:
 - 27 youth screened as at-risk for trafficking
 - No youth screened at the Federal level
- Family Assessment Program Advocate Screenings:
 - 87 youth screened as at-risk for trafficking
 - No youth screened at the Federal level

Note: these are cases where parents pro-actively reached out to seek services to strengthen their family prior to full crisis escalation, which may account for a higher percentage of youth being assessed as at-risk for trafficking rather than meeting the Federal Definition level.

c. **Placement: The Jewish Child Care Association's Gateways Program**

The Jewish Child Care Association (JCCA) is an ACS contractor that provides foster home, residential, community, mental health and prevention services. Since 2011, ACS has contracted with JCCA for services provided at the Gateways Program, an intensive, specialized residential program for female trafficking victims ages 12 to 16. In 2019, Gateways served a total of 22 girls. JCCA currently supports these young people by using the Sanctuary trauma-informed care model, as well as a four-phase system of treatment that involves assessment, individual and family therapy, and peer counseling. Gateways maintains 12 child welfare beds specifically for sexually exploited girls who want to leave “the life.”

E. Community Support and Awareness Building

a. 2019 Results of the 2018 NYC Trafficking Convening

On November 7, 2018, ACS and the Manhattan District Attorney's Office held a convening entitled: A Roadmap for the Future: Key Strategies for Child Sex Trafficking Prevention and Intervention. Based upon the assessment of recommendations that stemmed from the convening, the District Attorney, working in consultation with ACS, developed in 2019 and released in early 2020, a Request For Proposals (RFP) towards funding services for trafficked and at-risk youth. <https://www.manhattanda.org/d-a-vance-invests-2m-to-create-youth-sex-trafficking-intervention-program/>

b. Annual Human Trafficking Awareness Exposition and Resource Fair, and Press Conference on

In recognition of January as National Slavery and Human Trafficking Prevention Month, ACS's Office of Child Trafficking Prevention and Policy launched its fourth year of trafficking prevention recognition events with a full day Human Trafficking Awareness Exposition on January 11th, “Human Trafficking Awareness Day,” attended by over 200 child welfare professionals

from City, State, Federal and community agencies. The Exposition included ACS's 2nd Annual Human Trafficking Awareness Resource Fair with 48 programs providing information and a press conference held by Commissioner David A. Hansell, along with the Mayor's Office to End Domestic and Gender-Based Violence (ENDGBV) Commissioner Cecile Noel, to introduce ACS' new trafficking awareness toolkit: "Child Trafficking and What YOU Can Do About It: A Guide for NYC Child Welfare Professionals." The Exposition also featured panel presentations by medical experts and service providers, "Quick Shares" (10 minute back to back agency presentations), trafficking relevant film screenings, an interactive art exhibit and a Trauma Reduction themed room. OCTPP also debuted its new double-sided youth focused palm card, with one side featuring information on "Movin' On:" The NYC Child Tattoo Eradication Project and the other side featuring "Questions to Think About and Where to Get Help." January also offered eleven additional large-scale trafficking awareness events, including the inauguration of two new training workshops on (1) Safety Planning with Youth and (2) Trans and Trafficked Youth.

c. New Trafficking Awareness Toolkit: "Child Trafficking and What YOU Can Do About It: A Guide for NYC Child Welfare Professionals"

In 2019, ACS released a 40 page, spiral bound, pocket sized "toolkit" entitled: "Child Trafficking and What YOU Can Do About It: Tools for NYC Child Welfare Professionals." 5,000 copies were printed and distributed to ACS and contract agency staff and to other trafficking related professionals to assist in improved identification of trafficking indicators and dynamics, skills enhancement, resource identification and service provision to trafficked and at-risk children. The toolkit met with such overwhelming success that 5,000 copies of an updated 2nd edition will be printed and distributed in 2020.

d. Successful Provision of Tattoo Removals Through “Movin’ On”: The NYC Child Tattoo Eradication Network and Project

Exploiter brandings such as tattoos inhibit emotional healing, affect physical safety and employment opportunities, and impede the ability to “move on” with life. For this reason, in 2018, the Office of Child Trafficking Prevention and Policy developed a network of doctors and tattoo artists to help youth remove or alter exploiter tattoos, along with a trauma-informed counseling component to provide the support needed for life changing decisions by trafficked and gang-involved youth. In 2019, “Movin On” responded to twenty-eight (28) initial tattoo removal/modification inquiries, resulting in

- Twenty-one (21) mandatory liability waiver forms sent in response to the initial inquiry.^{xviii}
- Twelve (12) waiver forms returned, resulting in eleven (11) referrals to licensed medical providers for tattoo removal, and one (1) referral to a licensed tattoo artist for requested cover-up work.
- Nine (9) waiver forms not returned despite follow up contact
- Three (3) withdrawn requests
- One (1) request from a distant county. As the scope of travel for tattoo removal in NYC was too distant, that county received program replication guidance to obtain local assistance for the youth.
- Three (3) inquiries that did not meet program requirements:
 - ineligible applicant (adults with no prior child welfare history)
 - non-response to eligibility information inquiry

e. Expansion of Trafficking Prevention Group Work

In 2018, OCTPP initiated direct service provision to trafficked and at-risk youth through facilitation of the “Not a #Number” trafficking prevention model developed by Love146, an international human rights organization with the mission to end child trafficking and exploitation through survivor care and prevention. In 2019, OCTPP expanded its group work initiative, providing a total of twelve (12) cohorts that reached seventy youth through a variety of models:

- Love 146’s “Not a #Number”^{xix} trafficking prevention curriculum: three cohorts reaching a total of 23 youth.
- “I am Little Red”^{xx} trafficking awareness model: 2 cohorts reaching 10 youth.
- “I am Phenomenal” creative arts/trafficking awareness model: 4 cohorts reaching 21 youth
- “Power Me Up” trafficking awareness and youth empowerment model: 3 cohorts reaching 16 youth.

f. Language Friendly Focus for Trafficking Awareness Campaign Featuring the Slogan: “Children are NOT for \$ale”

In 2019, ACS further enhanced its “Children are NOT for \$ale” child trafficking awareness campaign through translation into twelve (12) languages (Arabic, Bengali, Chinese, English, French, Haitian Creole, Korean, Polish, Russian, Spanish, Urdu, Yiddish) of its tri-fold “Child Trafficking and What YOU Can Do” brochure, its four “Children are NOT for \$ale” trafficking awareness posters, and its aforementioned double-sided youth focused palm card, with one side featuring information on “Movin’ On:” The NYC Child Tattoo Eradication Project and the other side featuring “Questions to Think About and Where to Get Help.”

F. Partnership with the National Center for Missing and Exploited Children (NCMEC)

In November of 2019, ACS established a partnership with the National Center for Missing and Exploited Children (NCMEC), who agreed to notify the Office of Child Trafficking Prevention and Policy/Safe Harbour Coordinator when NYC youth (both in care and not in care) are identified, and then share relevant intelligence through the Child Trafficking Mailbox. This information sharing will provide an additional opportunity to offer services to trafficked youth both affiliated and not affiliated with the child welfare system.

G. Using Training to Increase Awareness

One of the best ways to help trafficked and at-risk youth is to increase the ability of staff and other professionals to better identify exploitation, and thereby enhance the ability to engage with and provide appropriate services to this vulnerable population. ACS has been doing so through ongoing training efforts.

In 2019, the Office of Child Trafficking Prevention and Policy (OCTPP) worked diligently and continually to provide the highest quality of training, alone or in partnership with other trafficking related professionals, filling and/or facilitating 3,854 trafficking awareness and skills related training seats, targeting a wide audience that included ACS, foster care, prevention and juvenile justice staff, plus other City agencies, State agencies and community and faith-based agencies.

Of the 3,854 trained in 2019:

- 3,635 seats were filled through trainings directly provided by Office of Child Trafficking Prevention and Policy staff, or OCTPP staff in partnership with other experts.
- 215 seats were filled by trainings facilitated by graduates of the NYS Office of Children and Families Services (OCFS) Train the Trainer course sponsored by OCTPP in 2019.

- 4 seats were filled in a training facilitated by a graduate of the GEMS 3-day Train the Trainer course as sponsored by OCTPP through a prior Safe Harbor grant.

In addition to delivering OCFS' standardized training model ("Identifying and Supporting Survivors of Commercial Sexual Exploitation of Children and Youth Trafficking"), OCTPP developed and provided a variety of original, specialized trainings, including:

- Understanding Child Trafficking Dynamics: A Comprehensive Introduction
- Understanding Child Trafficking: A Bio-Psycho-Social Perspective
- Attachment and Trauma Bonding
- Safety Planning WITH Trafficked Youth
- Endorsing Exploitation: The Influence of Media on the Developing Vulnerable Adolescent
- NYS Mandated Sex Trafficking Screenings and the ACS Child Trafficking Database (CTDB)
- Law Enforcement and Legal Perspectives on Child Trafficking
- Trans and Trafficked
- Understanding, Recognizing and Responding to Human Trafficking
- Female Genital Mutilation/Cutting (FGM/C): Overview, Engagement Strategies and Resources

Additionally, The Executive Director of the Office of Child Trafficking Prevention and Policy (OCTPP) who is a Licensed Clinical Social Worker (LCSW-R) presented two original workshops at the 2019 Shared Hope International Juvenile Sex Trafficking (JuST) Conference in Cincinnati, Ohio. The JuST is the nation's largest and most renowned annual juvenile sex trafficking conference. This opportunity provided for the sharing of lessons learned in NYC with other jurisdictions and the acquirement of new knowledge and techniques from other

programs that can be used to benefit NYC youth. She also presented expert workshops and exchanged information at:

- The International Association of Social Work with Groups 41st Annual Symposium: Group Work in Communities: Breaking Down Barriers, Building Global Connections (with the OCTPP team)
- The 2nd Annual Staten Island Human Trafficking Awareness Conference: The Social Media and Human Trafficking Connection
- JCCA's 2019 CSEC Conference: "Layered Vulnerabilities: CSEC Policy, Practice & Prevention for Multiple-Risk Populations

Conclusion

Over the past seven years, through the Safe Harbour affiliation, ACS and DYCD have worked together to systemically recognize and address the needs of sexually exploited young people. The Safe Harbor Act and state and agency resources have allowed us to strengthen our work in this area by enhancing existing services and developing increased specialized services for this population, training staff, and evaluating mechanisms to improve our efforts to identify and document sexually exploited youth.

For seven years (2013 to 2019), NYC has been the recipient of Safe Harbour grant funding from NYS OCFS as follows:

Year	Funding
2013	\$622,220
2014	\$550,000
2015	\$550,000
2016	\$448,000
2017	\$374,000
2018	\$88,900
2019	\$88,900

The original 5 year Safe Harbour grant funding to New York City was drastically reduced by the State to a baseline amount in 2018. ACS has asked the State to restore this critical funding as this reduction places key services and interventions at risk.

We acknowledge the COVID-19 crisis that began to spread in the first part of Calendar Year 2020, and the enormous impact it continues to have on our youth, staff, and communities. The ACS Office of Child Trafficking Prevention and Policy is operational and available for response to all inquiries, and for the provision of guidance, technical assistance, resource referrals and tattoo removal requests. Case consultation is available by telephone, and multi-disciplinary conference calls can be arranged. Although in-person trainings are currently on hold, OCTPP is available to participate in webinars and to provide training through available web-based environments. ACS, DYCD, and our partner agencies remain committed to helping make sure youth are safe and stable as the unprecedented challenges related to the crisis unfold. We greatly appreciate the Council's attention to this vulnerable population of children and look forward to discussing how the Council can provide additional support for ongoing work to help the trafficked and sexually exploited children of NYC.

Appendix A: NYC DYCD 2019 Statistics

DYCD Safe Harbour Data for New York City: 2019: Exploited Children and Children At-Risk of Exploitation																		
DYCD Program	Total Youth	Cis M	Cis F	Trans F	Trans M	No G Discl	GNC	<12	12 to 15	16 to 18	>18	Age Unk	ACS only	DYCD only	ACS & DYCD	Age Unk	MH Referrals	MH Counseling
DYCD Drop Ins	198	49	138	8	3	0	0	0	0	46	152	0	0	144	54	0	36	23
DYCD Crisis	330	111	150	44	25	N/A	N/A	0	0	53	277	0	0	259	71	0	227	210
DYCD TILS	95	19	55	17	4	0	0	0	0	12	83	0	0	67	28	0	58	33
Total	623	179	343	69	32	0	0	0	0	111	512	0	0	470	153	0	321	266

- 330 youth received Crisis Services Programs
- 95 youth received services from Transitional Independent Living Programs (TILS)
- 198 youth received services at Drop In Centers
- 321 youth received mental health referrals
- 266 youth received mental health counseling

Appendix B: Safe Harbour Providers 2019

NYC Administration for Children's Services																
2019 NYC Safe Harbour Data: Exploited Children and Children At-Risk of Exploitation																
as reported by ACS, DYCD and Safe Harbour Providers																
Safe Harbour Provider	Total Youth	Cis M	Cis F	Trans F	Trans M	No G/Disc	GNC	<12	12-15	16-18	>18	Age unk	ACS only	DYCD only	ACS+DYCD	Unk
Child Trafficking Mailbox	99	4	92	2	1	0	0	0	40	53	6	0	99	0	0	0
Child Trafficking Database	25	2	23	0	0	0	0	2	6	17	0	0	25	0	0	0
Children's Center Counselors	60	0	55	2	2	0	1	0	23	35	1	1	60	0	0	0
DYCD RHY Programs	623	179	343	69	32	0	0	0	0	111	512	0	0	470	153	0
Safe Horizon Street Outreach	962	242	378	313	15	14	0	0	0	51	911	0	7	0	0	955
OTDA Confirmations (0 - 23)	115	18	97	0	0	0	0	5	27	40	43	0	0	0	0	115
Gateways Program (Placement)	22	0	22	0	0	0	0	0	13	7	2	0	22	0	0	0
New Beginnings (Preventive)	151	31	120	0	0	0	0	0	109	41	1	0	151	0	0	0
Preventive Advocate Cases	27	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Family Assessment Program	87	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Totals:	2171	476	1130	386	50	14	1	7	218	355	1476	1	364	470	153	1070
Section Totals:	2171	2,057					2,057					2,057				
Preventive Advocate Cases: 20 youth screened as Medium Risk and 7 youth screened as High Risk. No youth identified at the Federal Level, so no demographics provided.																
Family Assessment Program Advocate Cases: 70 youth screened as Medium Risk and 17 youth screened as High Risk. No youth identified at the Federal Level, so no demographics provided.																
New Beginnings served a total of 244 children ages 0 through 18+. 93 children were under the age of 12. Since the program serves subject children age 12 and older, it is likely these are siblings of the subject children, not subject children themselves. Therefore the 93 children under age 12 have not been included in the total for New Beginnings.																
OTDA collects data on confirmed victims of all ages, but only data from ages 0 to 23 was used as 23 is when all youth would have exited the child welfare system.																

Appendix C:

NYC Administration for Children's Services' Child Trafficking Database (CTDB)

Administered by the ACS Office of Child Trafficking Prevention and Policy (OCTPP), the Child Trafficking Database (CTDB), platformed in Microsoft Dynamics, allows assigned staff to complete the two mandated OCFS sex trafficking screening tools, thereby alleviating the use of paper tools. All children under investigation, in the care of ACS contracted foster care agencies, and receiving services from prevention service agencies or juvenile detention providers are expected to be screened using the CTDB. Children in Advocate (ADVPO) cases are not screened in the CTDB. They are screened using paper tools.

The CTDB allows staff to view child trafficking screening histories of children on their caseload, input screenings and view caseload demographics relevant to screenings assigned. The CTDB permits every screening to be recorded and saved in the system for future access by a worker (and supervisor) assigned to a child (and only when a worker/supervisor is assigned to a child), and for administrative research and reporting needs, as required by Federal and State legislation.

The development of the CTDB had been divided into two phases: Phase I: Child Trafficking Screening Tool and Phase II: Demographics and Service Data and Reports.

- Phase I (launched on February 15, 2017) provides a mechanism for data input as per NYS Child Trafficking Screening mandates.
- In Phase II (developed during 2019 and scheduled for launch in early 2020), the CTDB has been enhanced to include a new services entry section for all youth who progressed to the comprehensive screening level, thereby permitting the longitudinal capture of service provision information for all youth identified as trafficked or at-risk for trafficking. Phase II will also provide automatic report

generation functionality, to provide data as required by the City Council and OCFS and to identify indicators relevant to understanding child trafficking in NYC's child welfare system. This phase will therefore permit large scale indicator identification, tracking, data collection and aggregation of all youth identified as trafficked, or at-risk for trafficking through ACS' protective investigations and within the foster care, prevention and detention systems. Phase II will also provide extended levels of administrative access and area compliance report generation ability for divisional and agency managers and executives.

Trainings on how to use the CTDB are conducted regularly. An electronic mailbox, available at CTDB@acs.nyc.gov provides access to technical support. A [CTDB Reference Guide](#) provides text guidance for users, and [CTDB Training Slides](#) provide screen shots on how to navigate the database. A CTDB E-learn is under development.

End Notes

ⁱ Mt. Sinai-St. Luke's New Beginnings Preventive Program accepts referrals for children age 12 and up who have been sexually abused and/or sex trafficked. New Beginnings worked with a total of 102 cases in 2019, 49 of which were new cases and 53 cases carried over from 2018, with a total of 244 children (subject child and siblings). There were 93 children under 12 years old in 2019. Since the program serves subject children age 12 and older, it is likely these are siblings of the subject children, not subject children themselves. Therefore the 93 children under age 12 have not been included in the total for New Beginnings.

ⁱⁱ OCTPP receives redacted sex trafficking screening data for Advocate (ADVPO) cases, which totaled 114 children determined to be at-risk of exploitation in Calendar Year 2019. Preventive Services Advocate Cases identified 27 children at-risk for exploitation, and Family Assessment Program Advocate Cases identified 87 children to be at-risk of sexual exploitation. For children deemed at-risk for trafficking, ACS' contracted Preventive and Family Assessment Program agencies do not transmit a breakdown of data on ADVPO cases beyond a total number of children and their risk levels. For children determined to be exploited, only age and gender are provided.

ⁱⁱⁱ As documented in 17-OCFS-INF-03: New York State Processes Related to Notifications of Victims of Human Trafficking (March 17, 2017), the NYS Anti-Trafficking Law (2007) requires the New York State (NYS) Division of Criminal Justice Services (DCJS) and the NYS Office of Temporary and Disability Assistance (OTDA) to accept referrals of potential victims from local law enforcement agencies or local district attorneys' offices. In 2015, the ability to refer potential victims of human trafficking expanded to include established legal and social services provider. OTDA and DCJS are charged with confirming or denying referrals of victims made to their agencies to allow access to services. Additionally, OTDA manages the New York State Response to Human Trafficking Program (RHTP). DCJS, in consultation with OTDA, must determine whether to confirm the referred person as a human trafficking victim (HTV) under statutory and regulatory guidelines. Once confirmed, victims are directed to either the LDSS or the RHTP service provider network. OTDA confirmation is confidential, and OTDA will only provide the number of confirmed victims, their age and gender. Some of the victims may be duplicative of reporting by other providers, but this is impossible to actually ascertain due to the confidentiality requirement. While OTDA collects data for victims of all ages, only data from ages 0 through 23 was utilized, as age 23 is when all youth are required to exit the child welfare system and receive adult services.

^{iv} Many of the youth worked with by the CSEC Counselors at the ACS Children's Center received multiple and/or extended sessions. Some youth received individual sessions, and also participated in groups.

^v Many youth are repeat contacts for street outreach and since youth rarely identify to Street Outreach workers, multiple counting is possible.

^{vi} 99 newly identified sexually exploited youth, or youth at-risk for exploitation were brought to the attention of ACS' Child Trafficking Mailbox. However, the Child Trafficking Mailbox received notification of many more youth who had been previously identified as exploited or at-risk for exploitation prior to 2019. The total number of youth addressed through the Child Trafficking Mailbox is documented in Section B: Data Capture Methodology.

^{vii} One (1) age non-disclosure was from the data submitted by the Safe Horizon Counselors at the Children's Center. Age disclosure is always encouraged, but never insisted upon so as not to negatively impact engagement with vulnerable youth.

viii Fourteen (14) of the youth with undisclosed gender identity stemmed from Street Outreach, where youth are asked, but not required to provide their ages. Gender identity disclosure is always encouraged, but never insisted upon so as not to negatively impact engagement with vulnerable youth.

ix The Child Trafficking Mailbox auto forwards emails to:

- Selina Higgins, Executive Director, OCTPP
- Shereene McDermott-Green, Supervisor, OCTPP
- Clifton Robertson, Social Worker, OCTPP
- Sabine Chery, Assistant Commissioner, Office of Older Youth Services
- Susan Morley, Senior Advisor for Investigations to the Commissioner
- James Ciccotelli, Operations Manager, ACS Investigative Consultation Program
- Peter Alexander, ACS Criminal Justice Coordinator

x The overall number of youth identified as “trafficked or at-risk for trafficking” decreased by 668 between 2018 (2,839 youth identified) and 2019 (2,171 youth identified). ACS is working with a more limited group of Safe Harbour program providers based upon the decrease in OCFS funds to NYC. As a result, we no longer receive data about trafficked and at-risk youth from previous Safe Harbour providers. However, in 2019, the number of youth identified to the ACS Child Trafficking Mailbox and through the Child Trafficking Database (CTDB) were almost all (120 youth of 124 youth) identified at the Federal Definition of Trafficking level. Therefore, although less youth were identified to the Safe Harbour Program overall in 2019, a higher percentage of youth were definitively identified as trafficked, rather than as at-risk.

xi 15-OCFS-ADM-16: Requirements to Identify, Document, Report and Provide Services to Child Sex Trafficking Victims. September 1, 2015 (Revised March 30, 2016).

xii The number of emails sent to the Child Trafficking Mailbox does not include additional trafficked youth emails sent directly to the Executive Director of OCTPP or to other OCTPP team members (not copied to the Mailbox), nor does it include the emails sent to the CTDB Mailbox, the Training Mailbox, the Tattoo Removal Mailbox or the FGM/C Mailbox.

xiii Trauma bonding occurs due to an ongoing cycle of abuse during which intermittent punishment and reward develop a powerful emotional bond which is highly resistant to change. The lessons and punishments become more severe over time, and the victim’s compliance increases to maintain the affection of the abuser.

xiv DYCD crisis shelters provide services to youth ages 16 – 20.

xv DYCD Transitional Independent Living (TIL) programs provide services to youth ages 16 – 20.

xvi DYCD drop in centers serve young people ages 14 to 24.

xvii The tattoo removal palm cards are available in Arabic, Bengali, Chinese, English, French, Haitian Creole, Korean, Polish, Russian, Spanish, Urdu, Yiddish. The YouTube video is available at:

<https://www.youtube.com/watch?v=NGUMtzplo48>

xviii To receive a tattoo removal referral, a youth over age 18, or the parent/legal guardian of a youth under age 18 must sign and return an “Assumption of Risk and Waiver of Liability” document agreeing to hold the City of New York harmless from any claims or demands. The participating medical provider must also sign a “Waiver of Liability” in reference to payment and legal responsibility by the City of New York prior to receiving any tattoo removal referrals.

xix <https://love146.org/notanumber/>

xx <https://www.iamlittlered.com/>