

Concerns on Proposed Primary Prevention Incentive Program (PPIP)



Primary Prevention and Positive Youth Development requires a long-term, consistent investment and commitment from New York State: An agenda that is currently and successfully supported through the Youth Bureau structure. Community-based alternatives and services are essential to keep communities safe and youth and families productive. Though Youth Development is not Child Welfare, nor Juvenile Justice, these supports can and do play a critical role.

The severity and extreme disproportionate 50% proposed reduction in youth funding, in addition to a 30% reduction to YDDP, SDPP and RHYA in the past three years, is a factor of concern for youth and families in our communities. In addition, the proposed county match to access funds as reimbursement at 62% state/38% local is an additional burden during these difficult economic times. Funding, albeit less than in the past, for Youth Development and Prevention Services must continue to be provided through a fair and equitable formula-driven allocation, and through municipal structures that ensure appropriate monitoring, evaluation and accountability prescribed in Executive Law 410, 19A.

Through County Youth Bureau structures, universal standards and outcome performance measures (such as QYDS) are universally implemented by all cities, towns, villages and community partners. **Thus, competition is based on outcomes that address local needs, not the best grant writers.**

POINT 1: THE COMPETITIVE DISTRIBUTION OF THE PPIP WILL ELIMINATE FUNDING TO MANY COUNTIES AND ALLOWS FOR A LOSS OF LOCAL PLANNING AND CONTROL; THEREBY PROMOTING INEQUITIES IN PREVENTION AND POSITIVE YOUTH DEVELOPMENT SERVICES ACROSS NEW YORK STATE.

- Clearly there is a utility in the autonomous co-existence of youth development, child welfare and juvenile justice, particularly during these challenging economic times. If youth bureaus do not exist, or if their status is based on State determination, control or competitive bid, their current support of specific child welfare and justice reform efforts cited throughout the State will be eliminated or severely compromised.
- A county with lower residential placements or child protective rates may have solid community supports and primary prevention programs that are currently funded by Youth Development Delinquency Prevention (YDDP), Special Delinquency Prevention Programs (SDPP) and Runaway and Homeless Youth (RHYA). Once stripped of funding, due to a competitive distribution of the proposed funding streams, these counties' placements and rates will skyrocket, creating greater residential need and child protection at higher costs to the State.
- The current formula driven appropriation will "share the pain" of a cut, yet ensure that all counties, cities, towns and villages have the opportunity to provide primary prevention and positive youth development programs. The long-term, youth development allocations throughout New York State serve as a foundation to support other areas of services, such as integration to the community, lower recidivism and placement rates. Conversely, if this allocation is altered, or becomes ever-changing, this will de-stabilize a broader health and human services network.
- The "incentive" in this proposal is actually a **disincentive** to positive youth and family development as municipal access to funding may be determined by such indicators as placement rates, delinquency, etc.

POINT 2: NEW YORK STATE IS ABANDONING ITS LEADERSHIP IN YOUTH PREVENTION AND POSITIVE DEVELOPMENT SERVICES AS ARTICULATED IN THE EXECUTIVE LAW 420 19A.

- Since the inception of the Youth Bureau system in 1965, New York State has been a national leader in youth development, prevention and intervention services. These services are an effective alternative to juvenile/criminal justice and a viable support to youth and families throughout the child welfare arena.



- The implementation of this program could dismantle an entire system and leave Counties with a structural void in determining local priorities, allocating/leveraging/coordinating resources, program development, evaluation and accountability.
- State Aid currently provided through Executive Law 420, 19A is a magnet for other local, state, federal and private funding. If New York State diminishes its commitment to this structure, it will have a deleterious impact on all leveraged resources well beyond those of this proposal. Under this proposal, funding streams to communities such as AmeriCorps, DCJS, SAMSHA, U.S. Health and Human Services, USDA Summer Feeding, etc. will be lost.



POINT 3: IT IS NOT ECONOMICALLY PRUDENT TO FIRST SUPPORT YOUTH AT THE DOORSTEP OF CHILD WELFARE AND/OR JUVENILE JUSTICE SYSTEMS. WHAT WILL HAPPEN TO YOUTH ACROSS THE STATE WHO WILL NO LONGER RECEIVE SERVICES? THEY WILL END UP IN THE CHILD WELFARE, JUVENILE JUSTICE SYSTEM OR, WORSE -- IN HARM'S WAY.

- The youth bureau system currently provides youth development, prevention and intervention services to over 2 million youth and their families throughout New York State.
- Services are community-defined and diverse - youth violence and gang prevention, leadership development, community service learning, employment/employability, family support, after-school opportunities, life skills education, literacy, obesity/healthy eating, juvenile justice, runaway/homeless, teen pregnancy/HIV prevention, family mediation, drop-out prevention, etc.
- What happens to these youth and families as of July 1, 2011 if services become a lesser priority, particularly in tough fiscal times? ***This date, at a minimum, needs to be rescinded.***

POINT 4: THE FLEXIBILITY AND LOCAL DECISION-MAKING ARGUMENT IS ILLUSORY AS THE LOCAL PLANNING PROCESS WILL BE LOST ALONG WITH THE COUNTIES' ABILITY TO ADAPT THEIR ALLOCATION TO THE DISTINCTIVE NEEDS OF THEIR YOUTH, FAMILIES AND COMMUNITIES. IN DOING SO, LOCAL CONTROL DIMINISHES AS STATE CONTROL DOMINATES.

- Youth Bureaus have proactively partnered with New York State to work collaboratively with Municipal Chief Executives, Local District Social Services Commissioners, law enforcement and the broader community to address the needs of all youth and have demonstrated the value of this approach in reducing the need for more costly systems of care.
- Youth Bureaus currently engage in:



- **Planning** – to forecast, analyze and respond to trends prior to the need for more costly systems of care;
- **Program Development** – to secure evidence-based practices and services that directly relate to locally defined needs;
- **Resource Coordination & Development** – to mobilize a variety of cross systems' resources for a youth agenda put forth in the Comprehensive Service Plan for Children and Families; and
- **Leveraging** – to parlay the state's investment with other local, private and federal support to promote an equitable distribution of responsibility for New York's youth and families.

POINT 5: FUNDING FOR POSITIVE YOUTH DEVELOPMENT AND PREVENTION SHOULD BE HELD TO UNIVERSAL STANDARDS RELATED TO ACCOUNTABILITY, MONITORING AND EVALUATION TO ATTAIN SUCCESSFUL OUTCOME PERFORMANCE AND TANGIBLE RESULTS - NOT TO A COMPETITIVE BID PROCESS

- The New York State Office of Children and Family Services (OCFS) invests a considerable amount of resources in the **Quality Youth Development System (QYDS)**, utilized by county Youth Bureaus. QYDS tracks outcomes for initiatives and provides evidence that a documented youth development framework, that includes the features of positive youth development settings, will improve outcomes for all youth, including high-risk.
- This system provides a concrete way to identify common outcomes for state funded programs and a system of monitoring and accountability for Youth Bureaus and their contractors.
- The system tracks all programs funded through the County Youth Bureaus and can serve as an example for other health and human service systems.