

The New York City Department of Social Services Equity Plan



The City of New York is committed to identifying and addressing inequities. To further this commitment, the enactment of Local Law 174 of 2017 (LL 174) requires that "relevant city agencies" develop an "Equity Plan" to identify policies and practices that may be implemented to address disparate outcomes on the basis of: race, ethnicity, gender (including gender identity and expression), income, and sexual orientation, and any other relevant population characteristics that the Mayor may identify. This Equity Plan is a second step in a multi-stage effort to comply with the requirements of LL 174.

Introduction to DSS

The City of New York has implemented an integrated management structure with both the Human Resources Administration (HRA) and the Department of Homeless Services (DHS) reporting to a single Commissioner of Social Services. This allows the two chartered agencies, HRA and DHS, to provide more seamless and effective client services. We are leveraging the shared services functions across the two agencies, resulting in better day-to-day management and building a unified mission across agencies.

Under the Department of Social Services (DSS) integrated management structure, the following are now shared services across both HRA and DHS: Equal Employment Opportunity (EEO); Legal Affairs, Contracts, and Policy, Procedures and Training; Information Technology Services (ITS); Program Accountability and Audits; Communications and External Affairs; Human Resources; Infoline; and Finance, Performance Management, Research, and Policy and Planning, as well as IDNYC.

The DSS Leadership team consists of the DSS First Deputy Commissioner and the DSS Chief of Staff; the General Counsel/Chief Legal Officer whose responsibilities include Legal Affairs, Contracts, Policy, Procedures and Training, and the Fair Hearing Administration; the Chief Program Planning and Financial Management Officer whose responsibilities include Finance, Evaluation and Research, Planning and Performance Management, and Business Process Innovation; the Chief External Affairs Officer whose responsibilities include Community Engagement and Access, Constituent Services, Office of Advocacy and Outreach, Communications, Marketing, Legislative Affairs, and Citywide Health Insurance Access; the Chief Operating Officer whose responsibilities include Human Capital Management, Information Technology Services, General Support Services, and Police Operations; and the Chief Program Accountability Officer whose responsibilities include Investigation, Revenue and Enforcement Administration and Audit and Quality Assurance Services. The First Deputy Commissioner of DSS oversees Public Private Partnerships, the Chief External Affairs Officer, the Chief Operating Officer, the Chief Program Accountability Officer, and Office of Administrative Hearings.

DSS has recently created the position of Chief Diversity and Equity Officer (CDEO), a new role that will be based in the Commissioner's office. The CDEO is charged with developing agency-wide policies on diversity and inclusion and ensuring that we are laser focused on the multiple factors that can impact diversity and equity in the workplace as well as in the services we provide. The CDEO is empowered to develop and deliver innovative solutions to increase diversity across DSS-HRA-DHS through the creation of agency initiatives that address staff engagement, recruitment, and advancement, as well as partner with all of our programs in efforts to incorporate equityinformed practices into our service delivery. The CDEO oversees the DSS Equal Employment Opportunity Office (EEO) as well as the gender equity position we have created within DSS-HRA-DHS.

In conjunction with the Mayor's Office of Immigrant Affairs (MOIA), DSS administers the New York City municipal identification program (IDNYC). DSS has also been designated to implement the Fair Fares program to help targeted New Yorkers below the federal poverty level partially defray the cost of mass transit. Both of these programs help promote equity in New York City.

HRA and DHS are led by Administrators for each agency who report directly to the DSS Commissioner and have operational leadership teams.

Introduction to DHS

In New York City and throughout the United States, homelessness is driven by income inequality, lack of affordable and supportive housing, eviction, and stagnant wages combined with social factors, including domestic violence, de-institutionalization of persons who are mentally ill without sufficient community-based services and discharges from a range of institutions. DHS promotes equity and addresses homelessness by connecting New Yorkers to preventive services that help them remain in their homes and, when prevention is not an option, by providing safe and appropriate transitional shelter and placement into permanent subsidized and supportive housing. In partnership with HRA and other agencies, DHS administers subsidized housing programs, including targeted rental assistance to help eligible families and individuals avoid or exit shelter.

In Fiscal 2016, Mayor de Blasio announced a comprehensive plan to reform the delivery of homeless services in New York City. The plan includes expansion of homeless prevention, greater street outreach through HOME-STAT, a program to engage

homeless individuals and connect them to support services, and enhancement of shelter services and security. "Turning the Tide," a report issued in February 2017, laid out a blueprint for moving forward with the reforms, providing borough-based services and shrinking the footprint of the shelter system by closing 360 facilities, including eliminating the 18-year old "cluster" apartment program and phasing out the use of commercial hotels that date back to the 1960s.

Introduction to HRA

HRA promotes equity for New Yorkers through providing services that fight poverty and income inequality, prevent homelessness and promote employment. HRA increases economic security by facilitating access to Cash Assistance, SNAP/food stamps, Medicaid and Child Support benefits, and employment and educational programs that emphasize individualized assessment, training and education, including access to fouryear college and sustainable jobs. HRA eliminated processes that lead to unnecessary case sanctions for clients willing to comply with work rules required by federal and state law; and implemented benefits re-engineering, which uses technology to streamline the SNAP/food stamps and Cash Assistance eligibility processes. HRA has also expanded access to benefits and services for New Yorkers with HIV by implementing the HASA for All initiative, providing services to families experiencing domestic violence, offering emergency food assistance, overseeing the adult protective services program, and has increased support for immigrants and New Yorkers facing eviction through expanded legal services funding.

Equity at DSS, HRA and DHS

DSS/HRA and DHS are dedicated to ensuring that all New Yorkers are healthy, housed, and financially secure to live safe and self-determined lives.

HRA promotes equity for New Yorkers through its commitment to services that fight poverty and income inequality, prevent homelessness and promote employment.¹

DHS addresses homelessness that is driven by social and structural factors such as income inequality, lack of affordable and supportive housing, stagnant wages, eviction, domestic violence, and a lack of community services for mentally ill and formerly incarcerated persons.

¹ Mayor's Management Report includes equity statements from both chartered agencies.

Equity Plan Workstreams

Upon examining DSS/HRA/DHS's rulemaking, contracting, actions, budget, procedures, services/programs, and employment in combination with national data and research on the topics analyzed, we will be focusing our efforts on the following issue areas:

- Developing additional training for all new staff, focused on reducing structural racism, sexism, homophobia, and classism, and developing implicit bias training for all 17,000 agency staff members
- Identifying programs and opportunities to enhance leadership training for women staff members and staff members of color and to diversify Managerial Staff
- Implementing program opportunities to support clients in the DHS shelter system who are experiencing arrests as a result of open warrants
- Improving the experience of Non-Custodial Parents with court summons in the Child Support System
- Structural and policy reforms to improve client experience in HRA SNAP and Job Centers

Issue #1: Potential Staff Bias Towards Marginalized Populations Served by DSS Office of Policy, Procedures, and Training

Disparity

HRA and DHS frontline staff members administer crucial support services for clients in crisis. Our staff members are charged with helping clients navigate often complicated federal, state, and local eligibility requirements, ensuring compliance with mandates, and preventing fraud or misuse of entitlements. All of our staff members show up every day to assist New Yorkers in need – even when they themselves are in crisis.

Working directly with clients experiencing trauma or crisis may lead to secondary traumatic stress symptoms in frontline providers.² Secondary traumatic stress can increase risk for burnout, which, in turn, is associated with reduced workplace performance and depression.³ Strategies identified to reduce secondary traumatic stress include maintaining work-life balance, use of peer consultation, supervision, and professional training.⁴

Bias has been defined as any "attitude, assumption, or judgment of any particular...group."⁵ While bias can be conscious and result in overt discriminatory acts, it can also be internalized and implicit, such as generalized assumptions about a person's background, and manifest as unintentional behaviors.⁶ Biases can impact trust and relationship-building between clients and staff or limit the attention staff provide,⁷ which can impact the efficacy of support and contribute to client feelings of oppression.⁸

Goal 1: Staff becomes more familiar with the deleterious impact of bias and trauma in order to improve client experience.

The DSS Office of Policy, Procedures and Training and Office of Human Capital Management are developing both new staff orientation and all staff training initiatives.

First, they are partnering to implement an agency-wide trauma-informed anti-bias five (5) day orientation program for new staff members. The goal of the program is to introduce new staff to concepts that increase their awareness of equity issues impacting client experiences in navigating social service programs and we hope it will also acknowledge and respond to the experiences some of our staff members have had themselves. Many employees begin their tenure with the city without much knowledge of the social context and history of the social programs that our agency administers. The training aims to empower and inform our staff to better serve our clients by providing some of that history and context. The orientation program will additionally increase staff awareness about sexual orientation, gender, racial, and income equity.

The curriculum for the new hires training will cover topics such as the history of social programs, trauma-informed care, domestic violence, LGBTQI basics, and mental health and disability affairs. The training will reach approximately 800 new hires per year.

DSS is committed to equipping new staff members with the tools to serve our diverse clients from the very beginning of their tenure. We hope this will bolster the ability of staff members to support themselves, each other, and our clients, and at the same time send a powerful message of our agency's commitment to responding sensitively to our clients.

⁵ Miller, K. M., Cahn, K., Anderson-Nathe, B., Cause, A. G., & Bender, R. (2013). Individual and systemic/structural bias in child welfare decision making: Implications for children and families of color. *Children and Youth Services Review*, *35*(9), 1634–1642. <u>https://www.sciencedirect.com/science/article/pii/S0190740913002363</u>

⁶ Greenwald, A. G., & Krieger, L. H. (2006). Implicit bias: Scientific foundations. *California Law Review*, 94(4), 945-967. <u>https://scholarship.law.berkeley.edu/cgi/viewcontent.cgi?article=1250&context=californialawreview</u>

⁷ Gershenson, S., Holt, S.B., & Papageorge, N.W. (2016). Ibid.

⁸ Weng, S.S. & Clark, P.G. (2018). Ibid.

Secondly, in addition to training for newly hired staff described below, the Department of Social Services has committed to conducting implicit bias training for all 17,000 DSS staff to promote diversity in the workplace and dignity-centered client services. The Office of Management and Budget is working with DSS to fund this initiative. Details for this training are currently under development.

Equity Metrics for Measuring Progress Towards Goal: The training effectiveness will be measured by evaluating knowledge retention and by asking staff questions about their ability to relate the training to their jobs.

Action 1: Developed Orientation Training

Developed orientation and agency-wide, trauma-informed anti-bias training. All new hires will now receive Lesbian, Gay, Bisexual, Transgender, Questioning, and Intersex (LGBTQI) Basics Training; Introduction to Disabilities: An Overview of Disability Awareness, Etiquette and Culture; Access for People with Disabilities – Ensuring Success through Supervision; Domestic Violence Training; Mental Health First Aid; The Effects of Poverty and Trauma; Customer Service Training; Structured Interviewing; Diversity and Inclusion: Everybody Matters. In addition to comprehensive orientation training that is now in place, DSS is implementing trauma-informed service delivery and anti-bias training for all 17,000 DSS, HRA and DHS staff.

Timeline and Milestones

- March 30, 2019 Developed curricula for New Hires training on DV, introduction to disability, LGBTQI, brain trauma, and poverty, as well as the history of social programs.
- June 30, 2019 Began on-going training for all newly hired staff

Lead Staff

- James Whelan, Executive Deputy Commissioner, Department of Social Services, Office of Policy, Procedures, and Training
- Sharon James, Assistant Deputy Commissioner, Department of Social Services, Office of Policy, Procedures, and Training
- Dawne McBarnette, Training Director, Department of Social Services, Office of Policy, Procedures, and Training

Action 2: Evaluation

Evaluation of staff knowledge and retention that will enable leadership to better understand the effectiveness of these trainings and how these trainings impact interactions between clients and staff.

Timeline and Milestones

• June 30, 2019 – Commenced Evaluation of First Cohort of Trainees

Lead Staff

- James Whelan, Executive Deputy Commissioner, Department of Social Services, Office of Policy, Procedures, and Training
- Sharon James, Assistant Deputy Commissioner, Department of Social Services, Office of Policy, Procedures, and Training
- Dawne McBarnette, Training Director, Department of Social Services, Office of Policy, Procedures, and Training

Action Metrics for Measuring Progress Towards Goal

Conduct post-tests and collect staff evaluations to measure knowledge gains and training effectiveness.

We will conduct post-tests and collect staff evaluations to measure knowledge gains and training effectiveness. The training effectiveness will be measured by evaluating knowledge retention and by asking staff questions about their ability to relate the training to their jobs. A similar evaluation approach will be taken for the all staff implicit bias training.

Goal 2: Improve Culturally Competent Service Delivery for LGBTQI Individuals Experiencing Housing Instability

Nearly one in five LGBTQI individuals have experienced homelessness at some point in their lives and more than one-third have reported trouble paying for housing, utilities and experienced some form of housing insecurity. LGBTQI youth are disproportionately represented among New York City's homeless youth, the majority of whom are youth of color. LGBTQI individuals, of all ages, experiencing homelessness are at increased risk of violence, abuse and exploitation compared to their heterosexual and cisgender peers. Given the issues and barriers facing LGBTQI clients, it is imperative that client services are culturally competent whether delivered in shelters or by preventive services providers within the City's Homebase network.

Equity Metric: Knowledge retention from the LGBTQI training and self-reported impact from post-training survey.

Although some Homebase prevention providers have demonstrable LGBQTI experience, there has not been standardized LGBTQI training developed for these providers. Providing comprehensive LGBTQI training to prevention providers, similar to the mandatory training required for all agency employees, is integral to providing culturally competent, quality service delivery to LGBTQI individuals experiencing homelessness.

Action 1: Meet with Homebase Directors

The first action is to present the training initiative at the Homebase Director's meeting, to make sure all providers are aware of this opportunity and the LGBTQI cultural competency expectations of DSS. This also provides an early opportunity to engage provider leadership and recruit partners in the process.

Timeline and Milestones

• February 2019 – Attended and presented at Homebase Director's meeting

Lead Staff

- Elana Redfield, Director of LGBTQI Affairs, Department of Social Services, Office of Advocacy and Outreach
- Sara Zuiderveen, Deputy Commissioner, Human Resources Administration, Prevention and Housing Assistance

Action 2: Assessment

Conduct a low-intensity survey or other assessment of Homebase providers to ensure that LGBTQI training is responsive to provider needs. This assessment would determine the areas of focus most relevant to providers as they build out their LGBTQI cultural competence and expand their service focus to include youth and young adults.

Timeline and Milestones

• April 2019 – Conducted assessment of providers

Lead Staff

• Elana Redfield, Director of LGBTQI Affairs, Department of Social Services, Office of Advocacy and Outreach

Action 3: Curriculum Development

With feedback from Homebase providers, an updated version of the DSS LGBTQI Basics Curriculum was finalized for delivery to the providers. In addition to topics and policies covered in the agency version of the training, DSS incorporated specific information that is relevant to the provision of preventative services.

Timeline and Milestones

• June 2019 – Finalized Curriculum

Lead Staff

- Elana Redfield, Director of LGBTQI Affairs, Department of Social Services, Office of Advocacy and Outreach
- Sara Zuiderveen, Deputy Commissioner, Human Resources Administration, Prevention and Housing Assistance

Action 4: Conduct Training

Conduct 10 training sessions, inviting attendees from all 7 Homebase providers and 24 work sites. Upon completion of the initial 10 sessions, we will offer additional sessions as needed to remaining staff. We may choose to work with internal trainers from some provider agencies, to ensure that the training is broadcast as far as possible.

Timeline and Milestones

- December 31st, 2019 Provide 10 training sessions
- June 2020 Provide additional trainings as needed to meet the need amongst Homebase providers

Lead Staff

- James Whelan, Executive Deputy Commissioner, Department of Social Services, Office of Policy, Procedures, and Training
- Elana Redfield, Director of LGBTQI Affairs, Department of Social Services, Office of Advocacy and Outreach

Action 5: Evaluate Training Impact

Once the Homebase trainings are completed, training impact will be evaluated using methods such as a survey or post-training evaluations. We expect this to shed light on whether the training was responsive to the needs of the service providers and help us plan for further LGBTQI capacity-building among Homebase providers.

Timeline and Milestones

• June 2020 – Conduct Evaluation

Lead Staff

- Elana Redfield, Director of LGBTQI Affairs, Department of Social Services, Office of Advocacy and Outreach
- Kinsey Dinan, Deputy Commissioner, Department of Social Services, Office of Evaluation and Research

Action Metrics for Measuring Progress Towards Goal

- Total number of sessions offered
- Number of individual staff members trained

Issue #2: Advancing Leadership Opportunities for Diverse Staff Human Capital Management and Equal Employment Office, DSS

Disparity 1

Employees in high-wage local government jobs have consistently been disproportionately white over the past 50 years (from 1960-2010) despite the passage of the Civil Rights Act of 1964 (that banned discrimination in employment on the basis race, color, religion, sex, and national origin) and changing demographics due to the passage of the Immigration and Nationality Act of 1965 (which abolished the decadeslong quota system for immigration to the United States based on national origins).⁹

According to the 2012 report *The Public Sector Job Crisis*, women and people of color working in the public sector experience wage disparities when compared to their male and white co-workers, but the wage gap is smaller than what they would experience in the private sector. ¹⁰ Women who are state and local public-sector workers earn on average 20.9% less than men working at the same positions. Women in the public sector with bachelor's degrees earn 16.9% less than men with bachelor's degrees (compared to women in the private-sector earning 18.9% less). Women with advanced degrees earn 12.4% less than their male counterparts. African American state and local public employees earn 2.2% less than their white co-workers (on average African Americans earn 12.9% less than whites). Hispanic state and local public sector workers earn 2.9% less than whites (compared to earning 11.1% less in the private sector).¹¹

Factors that contribute to the gender wage gap in New York City:

 ⁹ Gardner, T. (2013). The Racial and Ethnic Composition of Local Government Employees in Large Metro Areas, 1960-2010. Center for Economic Studies, 1. <u>https://www2.census.gov/ces/wp/2013/CES-WP-13-38.pdf</u>.
 ¹⁰ Ibid.

¹¹ Ibid.

- 1. Differences in access to educational opportunities that begin since birth.
- 2. Social expectations of what kinds of jobs/careers are considered valuable and who is appropriate for certain types of work or study.
- 3. Occupational segregation that results in Black women being underrepresented in the highest-paying fields (finance, law, engineering, technology, science, math) and overrepresented in less stable and lower-paying jobs (retail sales, food service, home health aide jobs). ¹²

These structural inequities have resulted in disproportionate advantages for white and male employees and disproportionate disadvantages for Black and female employees. DSS/HRA and DHS employment data suggests that agency leadership does not proportionally represent our workforce. Data additionally confirms that white people are paid higher wages at a disproportionate rate than people of color. These disparities could be due to structural barriers for staff of color, including limited access to existing career development opportunities.

Goal 1: Increase representation of women and people of color in mid and upper-level leadership positions in DSS, HRA and DHS to better reflect the broader diversity across the agency and proportionally reflect the demographics of frontline and non-managerial staff.

Equity Metric: Increase in career and professional development and advancement, and in pipeline opportunities for women and people of color in DSS, HRA and DHS.

Action 1: DSS Diversity Council

Develop and implement the DSS Diversity Council. The DSS Diversity Council will be comprised of staff from various levels and provide recommendations to increase diversity and inclusion regarding recruitment, leadership roles, employee programs, professional development opportunities, and more. The Council will serve as a resource and facilitator of our diversity and inclusion efforts. This team will support hiring and promoting diverse staff; ensure employee programs educate and promote inclusion of diverse cultures and groups; ensure professional development opportunities are made available to all staff; and that DSS/HRA and DHS contract with client-serving vendors that are diverse and representative of the communities they serve. The Council will be structured to include majority participation from front line staff and ensure representation from a wide range of programs. It will also include staff from diverse racial and ethnic backgrounds, LGBTQI staff, staff with disabilities, staff from various age groups, and staff with veteran status.

¹² Ibid.

Timeline & Milestones

- March 30th, 2019 Created proposal for Diversity Council structure to be reviewed by appropriate stakeholders.
- July 31st, 2019 Meet with stakeholders to get feedback on the proposal and incorporate changes.
- August 31st, 2019 Finalize Diversity Council structure with Human Capital Management, Equal Employment Opportunity, and External Affairs
- September 30th, 2019 Develop recruitment plan for the Council.
- November 30th, 2019 Recruit staff for Diversity Council, including representation from diverse civil service titles, frontline staff, and varied management levels.
- January 15th, 2020 Launch Diversity Council

Lead Staff

- Lawanna Kimbro, Department of Social Services, Chief Diversity & Equity
 Officer
- Mark Neal, Executive Deputy Commissioner, Department of Social Services, Office of Human Capital Management (HCM)
- Stephanie Grant, Assistant Deputy Commissioner, Department of Social Services, Office of Equal Employment Opportunities (EEO)
- Maritere Arce, Chief External Affairs Officer, Department of Social Services, Office of External Affairs (OEA)

Goal 2: Increase career and professional development and advancement opportunities for staff on all levels of the agencies to increase representation of women and people of color in mid and upper-level leadership positions.

Action 1: Organizational Management and Leadership Development

Expand the pool of applicants to the 14-week Organizational Management and 9-month Leadership Development Program (OMLD), the Professional Development Training Academy (PDTA) and other leadership development opportunities to include greater staff participation from the Department of Homeless Services (DHS). OMLD participants receive a link to complete an online evaluation of the course contents and the program experience every four weeks (at the conclusion of each module). At the end of the program, all participants (in teams) deliver a change project presentation to senior leadership some of which have been implemented agency wide.

Timeline & Milestones

- January 2018 Opened OMLD recruitment to DHS staff
- August 2018 Continued OMLD recruitment to include DHS staff and opened PDTA recruitment to DHS staff
- Ongoing PDTA participants provide feedback to facilitators for use in developing the next cycle of the program

Lead Staff

• Sharon L. James, Assistant Deputy Commissioner, Department of Social Services, Office of Policy, Procedures, and Training

Action Metrics for Measuring Progress Towards Goals in Disparity 1

- Increase participation by DHS staff to have representation of at least 14% of staff in each cohort
- Encourage completion of end of module and program surveys for a return of at least 90% for a greater impact on content and/or process improvements

Action 2: DSS Leadership Connect

Create opportunities for staff at different levels to interact with senior and managerial staff and staff in other departments. This will enable staff at all levels to be aware of new opportunities, enhance their skills, and learn more about the pathways towards professional growth in the agency. Participants will become informed of how strategic decisions are made at the managerial level and acquire and enhance skills. Launching in January 2019, "Leadership Connect" will pair selected staff in supervisory or managerial roles with senior staff for mentorship, job shadowing, and leadership development training as an opportunity for challenge and growth within the Agency.

Timeline & Milestones:

- January 2019 Selected participants, matching pairs, finalizing all program details
- April 2019 Program launched (every other Thursday for 6 months)
- September 2019 Pilot cycle concludes, determination by Agency leadership for next steps
- 2020 Collaborate with DSS Office of Evaluation and Research to analyze effectiveness of program

Lead Staff

• Liz Lauros, Deputy Commissioner, Department of Social Services, Office of Strategic Partnerships

• Sharon James, Assistant Deputy Commissioner, Department of Social Services, Office of Policy, Procedures, and Training

Disparity 2

The areas of our workforce with more client contact, mandatory overtime, and lower pay are majority people of color and female, while the upper tiers with less direct client contact and higher salaries are disproportionately likely to be white and male.

Equity Metric: Expanded opportunities to improve work-life balance among staff within DSS, HRA and DHS.

Goal 1: Evaluate and implement programs to improve quality of life for all staff, especially frontline, client-facing and program staff.

Action 1: Staff Engagement Survey

Conduct Staff Engagement Survey on such topics as quality of life, employee resources, dress code, agency culture, job satisfaction, and safety.

Timeline & Milestones

- July 2019 Collaborate with Office of Communications and Marketing (OCM) and Office of Evaluation and Research (OER) in the development of the survey
- September 2019 Review survey questions with senior leadership.
- October 2019 Collaborate with OCM to ensure joint participation among DSS-HRA-DHS and distribute survey
- November 2019 Distribute survey to all staff
- December 2019 Collect survey results
- January 2020– Analyze results of survey
- March 2020 Collaborate with the DSS 2.0 Cross Unit/Agency Working Group to develop strategies for improved work-life opportunities and to information on such opportunities

Lead Staff:

- Lawanna Kimbro, Department of Social Services, Chief Diversity & Equity
 Officer
- Mark Neal, Executive Deputy Commissioner, Department of Social Services, Office of Human Capital Management (HCM)
- Stephanie Grant, Assistant Deputy Commissioner, Department of Social Services, Office of Equal Employment Opportunities (EEO)
- Maritere Arce, Chief External Affairs Officer, Department of Social Services, Office of External Affairs (OEA)

Action 2: Work-Life Committee Expansion

Promote and expand Work-Life Committee which focuses on best practices for addressing employee work-life balance and promotes quality of life initiatives.

Timeline & Milestones:

- January 2019 Collaborated with Office of Communications and Marketing (OCM) to develop strategy to market Work-Life Committee to DSS-HRA-DHS staff and leadership
- February ongoing 2019 Implement marketing strategy to recruit staff and leaders to participate in the Committee
- July 2019 ongoing Develop quarterly e-mail blasts advertising work-life events, initiatives, and opportunities.

Lead Staff

- Mark Neal, Executive Deputy Commissioner, Department of Social Services, Office of Human Capital Management (HCM)
- Saratu Ghartey, Chief Program Accountability Officer, Department of Social Services, Office of Program Accountability
- Hunter Gradie, Chief of Staff, Department of Homeless Services

Action Metrics for Measuring Progress Toward Goals in Disparity 2

- Increase staff participation on the Work-Life Committee by 30%.
- Increase senior management's participation on the Work-Life Committee by 30%.
- Ensure that Work-Life-Committee representation includes DSS-HRA-DHS staff.

Disparity 3

The DSS, HRA and DHS employee information systems do not currently enable staff to self-identify their gender or preferred name. The current systems permit only binary "male" and female" gender options, which does not allow for non-binary people to select an option that affirms their identity, and in fact may actively force them to choose a gender they do not identify with. The current systems also only allow legal names, which for many transgender people may not align with their gender expression. Due to financial, institutional, and cultural barriers, those who want to change their government-issued identity documents may not be able to do so. Others may prefer to keep their documents under their legal name, even if they go by another name. This is true for people who are not transgender as well, such as people who use a nick-name or another name in the workplace which is different from their government ID.

Additionally, many of our client-facing systems include fields for gender pronouns, but employees and applicants are not offered the same opportunity for the purposes of our

human resources systems. Although the central systems which track employee records are maintained by DCAS, DSS operates many personnel systems over which we do have control.

Goal 1: Update employee-facing systems to better account for transgender, nonbinary and gender non-conforming applicants and employees.

Making these upgrades will allow us to create a more affirming environment for both current employees and prospective new hires.

Equity Metric: Utilization of newly-created fields after implementation and systems change announcement.

Timeline & Milestones:

- March 2019 Met with DOHMH to learn about their process and technical obstacles when implementing a similar system
- April 2019 Collaborated with DOHMH and other agencies to identify standards and practices for inclusion of preferred name, non-binary gender, pronouns, etc. in personnel systems
- September 2019 Bring initiative to the IT Governance Committee for priority and greenlighting
- December 2019 Develop internal IT procedure for identity standards
- June 2020 Implement these system upgrades through phased rollout pending funding

Lead Staff:

- Mark Neal, Executive Deputy Commissioner, Department of Social Services, Office of Human Capital Management (HCM)
- Elana Redfield, Director of LGBTQI Affairs, Department of Social Services, Office of Advocacy and Outreach

Issue #3: Unserved Warrants for DHS Shelter Residents Department of Homeless Services

Disparity

It has been estimated that there are between 2 and 3 million unserved warrants in the U.S. at any given time, ^{[1] [2]} and warrant backlog increases exponentially, as unserved warrants accumulate ^{[3] [4]} and additional warrants beyond the original charge are issued for failing

to appear in court.^[5] ^[6] Indeed, the majority of warrants issued are for minor offenses; more than half of open warrants are court-related offenses (most commonly failure to appear), as well as parole and probation violations, bail violations, or court-processing violations.^{[7] [8]} And though some warrants expire, many are open indefinitely; in one review of open warrants, only about 30% had been issued in the last year, and 10% had been issued more than 8 years earlier.^[9] Having an open warrant can lead to challenges obtaining employment, housing, and treatment of all types, and if an individual receiving public benefits is found to have an outstanding warrant, they can be denied benefits.^[10] ^[11] In addition, those with open warrants may be more vulnerable to crimes if perpetrators know that they are unlikely to seek protection through police or the courts.^[12] In some cases, open warrants are used to justify aggressive enforcement tactics, such as sweeps of homeless shelters or in low-income neighborhoods.^[13] Such sweeps have been reported in homeless shelters in NYC, even though they are against official DHS and NYPD policy.^[14] This practice may keep some clients on the streets, to avoid arrest.^[15] And while data on number of outstanding warrants by socio-demographics is limited, those in poverty and Blacks and Latinx are overrepresented in the criminal justice system,^{[16] [17]} and the same trends appear to hold true for those with outstanding warrants.^[18] There is some data indicating that there are more warrants for minor offenses among minorities than Whites,^[19] and that sweeps for warrants in low-income neighborhoods identify more open warrants than in other neighborhoods.^[20]

The experience of being homeless and unsheltered results in those living in public spaces breaking public space rules and transforming public spaces into their private environment for activities such as sleeping and eating.^[21] ^[22] This rule-breaking can lead to feelings of aversion in the general public,^[23] and is often the basis for police and legal actions against those who are homeless and unsheltered.^[24]

Since June 22, 2018, there have been 1,324 arrests made of DHS clients, both in and out of shelters. This high number of arrests runs counter to DHS' mission of helping clients get back on their feet with dignity. With the creation of the DHS Serious Incident Unit (SIU) in June of 2018, all arrests began to be sent out in real time, highlighting the asymmetric criminal justice response toward DHS shelter clients involved in low-level, non-violent incidents. An analysis of this data showed that it is estimated between 300-500 of the arrests were connected to an outstanding warrant, often stemming from minor infractions.

Goal: Reduce arrests in shelters based on outstanding warrants for minor infractions.

Analysis of DHS client arrest data tracked by the DHS Serious Incidents Unit indicates that annually 300-500 of the arrests were related to outstanding warrants, often for minor infractions. Arresting clients in shelters for small infractions adds to their trauma and impedes their path to self-sufficiency and permanency. To mitigate this disparity, DHS is providing tools and training to decrease client arrests for low-level incidents at shelters and launching a multi-prong initiative to clear low-level warrants for shelter clients.

Equity Metric: Decreased number of clients arrested in shelters and the number of DHS client warrants cleared.

Action 1: Building Strategic Partnerships

DHS engaged with the appropriate partners to operationalize warrant clearing. Warrant clearing has existed in New York in many forms, and DHS engaged the expert groups. DHS has currently convened three planning meetings:

Timeline and Milestones

- October 2018 Held First Meeting
 - DHS, Mayor's Office of Criminal Justice (MOCJ), Legal Aid
 - Established project intentions, scoping the project
- October 2018 Held Second Meeting
 - DHS, MOCJ, Legal Aid, Office of the Court Administrator (OCA), Coalition for the Homeless
 - Discussed operational needs of project
- November 2018 Held Third Meeting
 - DHS, MOCJ, Legal Aid, Manhattan District Attorney (MN DA), Brooklyn District Attorney (BK DA), OCA, Coalition for the Homeless
 - Choosing pilot shelters, data match, outside vs inside shelter
- December 2018 Held Fourth Meeting
 - DHS, MOCJ, Legal Aid, MN DA, BK DA, OCA, Coalition for the Homeless
 - Finalizing pilot shelters, finalizing operations

Lead Staff

- Annie Mabus, Office of the Administrator, Department of Homeless Services
- Iris Rodriguez, Deputy Commissioner, Department of Homeless Services, Adults Programs

Lawanna Kimbro, Chief Diversity and Equity Office, Department of Social Services

Action 2: Selecting Pilot Shelters

With support from both the Manhattan and Brooklyn District Attorneys, DHS plans to choose two large single men's shelters to pilot shelter-based warrant clearings. DHS will work with Legal Aid Society and OCA to ensure that clients do not risk further criminalization by participating in this pilot. To that end, OCA is providing teleconferencing for judges clearing warrants, ensuring that there will be no court officers in shelters. Men in the DHS Single Adults Shelters are most likely to be arrested for low-level warrant checks, and they are the ideal population for the pilot. DHS will work with Legal Aid and Coalition for the Homeless to ensure that clients will not be singled out for having warrants at the pilot shelters.

Timeline and Milestones

• January 2019 – Selected pilot shelters

Lead Staff

- Annie Mabus, Office of the Administrator, Department of Homeless Services
- Iris Rodriguez, Deputy Commissioner, Department of Homeless Services, Adults Programs
 Lawanna Kimbro, Chief Diversity and Equity Office, Department of Social Services

Action 3: Client Engagement

DHS will partner with the Legal Aid Society and Coalition for the Homeless in engaging clients at the pilot sites to reassure them that participating in warrant clearings will not endanger their shelter placements or open them up to further criminalization. Legal Aid and Coalition have deep ties and trust in the client community, so they will outreach to clients to communicate DHS's commitment to this endeavor. Case managers will engage clients and fliers and posters will be prominently displayed.

Timeline and Milestones

• January to March 2019 – Began outreach to clients

Lead Staff

- Annie Mabus, Office of the Administrator, Department of Homeless Services
- Iris Rodriguez, Deputy Commissioner, Department of Homeless Services, Adults Programs

• Lawanna Kimbro, Chief Diversity and Equity Office, Department of Social Services

Action 4: Program Launch

DHS will be the facilitator to other program partners. The first warrant clearing session will happen either in or close to a shelter in Brooklyn and a shelter in Manhattan. Legal Aid will search clients' names in appropriate databases to see if they have warrants. If warrants are found, Legal Aid will work with the clients on site to confirm information regarding the warrants. Once the processing is complete, the client will have a teleconference with a judge and with the Legal Aid attorney and the DA, and, in most cases, the judge will immediately clear the warrant, based on the type of infraction.

Timeline and Milestones

• March 2019 – Held first in-shelter session

Lead Staff

- Annie Mabus, Office of the Administrator, Department of Homeless Services
- Iris Rodriguez, Deputy Commissioner, Department of Homeless Services, Adults Programs
- Lawanna Kimbro, Chief Diversity and Equity Office, Department of Social Services

Action 5: Program Expansion to Second Shelter

We will expand this program to be a consistent, monthly event. We will assess the effectiveness of the first session and adjust the program model accordingly for future sessions.

Timeline and Milestones

• April 2019 – Held second in-shelter session

Lead Staff

- Annie Mabus, Office of the Administrator, Department of Homeless Services
- Iris Rodriguez, Deputy Commissioner, Department of Homeless Services, Adults Programs
- Lawanna Kimbro, Chief Diversity and Equity Office, Department of Social Services

Action 6: Program Expansion to Multiple Sites

After conducting several warrant clearing sessions, DHS will expand to multiple sites across the boroughs. Once the first sessions are completed, we will have an understanding of the operational lift of the program and will be able to put the expansion on a timeline.

Timeline and Milestones

• May 2019 – Began pilot expansion

Lead Staff

- Annie Mabus, Office of the Administrator, Department of Homeless Services
- Iris Rodriguez, Deputy Commissioner, Department of Homeless Services, Adults Programs
- Lawanna Kimbro, Chief Diversity and Equity Office, Department of Social Services
- •

Action Metrics for Measuring Progress Toward Goal

- Number of clients participating in warrant clearing
- Number of warrants cleared

Issue #4: Summons Package for Non-Custodial Parents Office of Child Support Services, Human Resources Administration

Disparity

Based on available administrative data, we estimate that more than 90 percent of the clients of the Office of Child Support Services (OCSS), a program of the New York City Human Resources Administration (HRA), are either Latinx or African-American and that the majority of them live in low-income households. Since child support in New York State is decided upon by courts—rather than administratively by a given jurisdiction's Child Support program, as it is in some states—many of our child support clients face the same barriers created by other legal processes. Among the most important of these is the complexity of legal documentation, which is generally crafted primarily to meet the rigors of legal scrutiny rather than the needs of ordinary readers.

The child support program was created in order to ensure an adequate standard of living for children in single-parent households,¹³ and child support receipt has been found to raise households out of poverty¹⁴ and been associated with better child health and cognitive and academic performance outcomes.^{15 16 17} However, child support is often not paid in full; in 2015, only 69% of custodial parents who were supposed to receive payments received any, and only 44% received full payments.¹⁸ The primary reason for lack of child support payment is low income or assets of the non-custodial parent.¹⁹ In addition to limiting the resources available to children, child support debt can have a substantial impact on non-custodial parents. Sanctions occurring on both the federal and state levels when non-custodial parents do not pay child support include wage garnishment of up to 65%; interception of tax refunds and unemployment compensation; freezing bank accounts, issuing property liens; reporting debt to credit agencies; revocation of passports; suspension of driver's licenses and professional licenses; and (while rare in NYS) incarceration.²⁰ Such sanctions can limit non-custodial parent's employment opportunities²¹ and lead them to seek off-the-books employment, ²² ²³ and increase the likelihood of having to live with family and friends, in order to save on housing costs.²⁴ Child support debt also appears to effect non-custodial parents' contact frequency with children and non-monetary support provision, primarily by negatively impacting relationship quality with the custodial parent.¹⁵

and child well-being. Washington, DC: Urban Institute Press.

¹⁶ Argys, L,M., Peters, H.E.; Brooks-Gunn, J., Smith, J.R. (1998). Impact of child support on cognitive outcomes of young children. *Demography*, *35*(2):159–173. <u>https://www.jstor.org/stable/3004049?seq=1#page_scan_tab_contents</u>
 ¹⁷ Nepomnyaschy, L., Magnuson, K. A., & Berger, L. M. (2012). Child support and young children's development. *Social Service Review*, *86*(1), 3-35. <u>https://www.journals.uchicago.edu/doi/abs/10.1086/665668</u>

¹⁸ Grall, T. (2018). Custodial mothers and fathers and their child support: 2015. Suitland, MD: US Census Bureau. Retrieved from <u>https://www.census.gov/library/publications/2018/demo/p60-262.html</u>

¹⁹ U.S. Census Bureau. Families and living arrangements: Child support. Retrieved from: https://www.census.gov/topics/families/child-support.html

resources/74641000B52C03BF4DFCD2289302D380

¹³ Baughman, R. A. (2017). The impact of child support on child health. *Review of Economics of the Household, 15*(1): 69-91. <u>https://doi.org/10.1007/s11150-014-9268-3</u>

 ¹⁴ Meyer, D. R., & Hu, M. C. (1999). A note on the antipoverty effectiveness of child support among mother-only families. *The Journal of Human Resources*, 34(1), 225-234. <u>https://www.jstor.org/stable/146309?seq=1#page_scan_tab_contents</u>
 ¹⁵ Knox, V. & Bane, M.J. (1994). *Child support and schooling*. In: Garfinkel, I.; McLanahan, S.; Robins, P. (Eds.). Child support

²⁰ Brito, T.L. (2012). Fathers behind bars: rethinking child support policy toward low-income noncustodial fathers and their families. *The Journal of Gender, Race, and Justice, 15*, 617-649.

²¹ Taylor, E. (2013). Non-custodial minority fathers maintaining their livelihood. Master's Thesis. St. Catherine University. <u>https://sophia.stkate.edu/cgi/viewcontent.cgi?referer=https://www.google.com/&httpsredir=1&article=1267&context=msw_papers</u>

²² Miller, D, & Mincy, R. (2012). Falling further behind? Child support arrears and fathers' labor force participation. *Social Service Review, 86*, 604-635. <u>https://www.journals.uchicago.edu/doi/abs/10.1086/668761</u>

²³ Turner, K. & Waller, M. (2017). Indebted relationships: Child support arrears and nonresident fathers' involvement with children. *Journal of Marriage and Family*, *79*, 24-43. <u>https://onlinelibrary.wiley.com/doi/abs/10.1111/jomf.12361</u>

²⁴ Katzenstein, M. F., & Waller, M. R. (2015). Taxing the poor: Incarceration, poverty governance, and the seizure of family resources. *Perspectives on Politics*, *13*(3), 638-656. <u>https://www.cambridge.org/core/journals/perspectives-on-politics/article/taxing-the-poor-incarceration-poverty-governance-and-the-seizure-of-family-</u>

These issues disproportionately affect low-income families of color, who make up a large proportion of states' child support caseloads.²⁵ Black, Latinx, and Native American custodial parents are less likely to receive full payments than White parents. Inequities in receipt of child support payment are greatest by income: 70% of custodial parents living in poverty receive no child support whatsoever. Child support debt also unequally impacts low-income non-custodial parents; it has been estimated that 70% of those who owe child support either have no earnings or earn less than \$10,000 per year, and that the average child support debt for low-income men is \$8,000–\$11,000.²⁶ In addition, the impact of child support nonpayment and debt has disparate impacts by gender. Over 80% of custodial parents in child support cases are women, and the poverty rate for custodial-mother families (41%) is nearly twice that of custodial-father families (23%).⁷ Conversely, most noncustodial parents in the child support system, who bear the brunt of enforcement actions, are low-income men.

Goal: Create more user-friendly sets of documents and procedures that better meet the needs of noncustodial parents when they first enter child support process will improve the economic well-being of our clients, who are majority Black and Hispanic men.

Equity Metrics for Measuring Progress Toward Goal

Increase participation of non-custodial parents in child support system

Action 1: Develop Packet

Develop a packet of new summons and petition documents. The current set of documents begin with a nearly blank cover sheet and then go immediately into the summons—a forbidding document written to meet legal conventions and thus full of difficult language and approaches to design, including long passages of capitalized text, that go against decades of research into readability for people working from a low to moderate level of literacy. More recent research regarding a wider set of practices associated with behavioral economics are also not taken into account. These comments also apply to some of the Child Support-specific documents that are included in the package and intended to be guides to the process, particularly the excessive use of capitalization and other forms of emphasis that fail to guide readers to the most important elements of the document. The current documents are also primarily focused

²⁵ Solomon-Fears. C. (2016). Child support: An overview of Census Bureau data on recipients. Congressional Research Service. Retrieved from: <u>https://fas.org/sgp/crs/misc/RS22499.pdf</u>

²⁶ Sorenson, E., Sousa, L., & Schaner, S. (2007). Assessing child support arrears in nine large states and the Nation. Washington, D.C.: Urban Institute. Retrieved from

https://www.urban.org/sites/default/files/publication/29736/1001242-Assessing-Child-Support-Arrears-in-Nine-Large-States-and-the-Nation.PDF

on negative consequences of noncompliance and give only a small amount of information that seem helpful (in a genuinely client-focused sense of the term).

We plan to address these issues by creating a set of highly readable, behaviorally attuned documents that attempt to break down the process into clearer, more manageable parts and provide additional, helpful information—while at the same time remaining clear about the short- and long-term negative consequences of not attending a child support or paternity hearing.

To evaluate the effects of this approach, we will gather baseline data before the launch of the program and compare it to post-launch data. The data we are interested in includes the number of orders given on default—that is, the number of child support orders made essentially without the noncustodial parent being present to supply the necessary information about his or her financial situation. Default orders, particularly when they come out of the Cash Assistance process, tend to expect noncustodial parents to pay more per month toward child support than regular orders; when this happens, noncustodial parents can fall into debt, creating stress for themselves and their families and potentially reducing their willingness to work in the above-ground economy and even making them less likely to see their children.

Timeline and Milestones

- January 30, 2019: Finalized new documents and translate
- March 15, 2019: Gathered baseline data

Lead Staff

- Frances Pardus-Abbadessa, Executive Deputy Commissioner, Human Resources Administration, Office of Child Support Services
- Elizabeth Kumar, Deputy Commissioner, Human Resources Administration, Office of Child Support Services

Action 2: Automate Mailing Process

Automate the process of mailing out the summons package in child support cases that come out of the Cash Assistance process. This is currently done manually by staff in different locations. Our goal is eventually to create a streamlined approach through DSS's Print to Mail (PTM) area (part of the Agency's Information Technology Systems program) that will help ensure the timely, consistent, and accurate distribution of materials.

Timeline and Milestones

• April 30, 2019: Completed system design

• June 3, 2019: Began testing, without initial distribution. This will include extensive quality assurance testing of all documents, since even slight errors in the process could have significant implications for clients.

Lead Staff

- Frances Pardus-Abbadessa, Executive Deputy Commissioner, Human Resources Administration, Office of Child Support Services
- Elizabeth Kumar, Deputy Commissioner, Human Resources Administration, Office of Child Support Services

Action 3: Test New Summons Package

Begin testing distribution through PTM. This again will require extensive quality assurance testing.

Timeline and Milestones

• July 1, 2019: Began quality assurance testing on PTM printing and distribution of mailings.

Lead Staff

- Frances Pardus-Abbadessa, Executive Deputy Commissioner, Human Resources Administration, Office of Child Support Services
- Elizabeth Kumar, Deputy Commissioner, Human Resources Administration, Office of Child Support Services

Action 4: Expand Test Pilot

Begin testing for cases that originate outside the Cash Assistance process. This again will require extensive quality assurance testing.

Timeline and Milestones

• August 1, 2019: Begin quality assurance testing on creation of non-Cash Assistance packages.

Lead Staff

- Frances Pardus-Abbadessa, Executive Deputy Commissioner, Human Resources Administration, Office of Child Support Services
- Elizabeth Kumar, Deputy Commissioner, Human Resources Administration, Office of Child Support Services

Action 5: Collect Data for Evaluation

Gather initial data to provide preliminary assessment of project status and progress toward goal

Timeline and Milestones

• September 30, 2019: Finalize description of project status and initial data analysis of progress toward goal.

Lead Staff

- Frances Pardus-Abbadessa, Executive Deputy Commissioner, Human Resources Administration, Office of Child Support Services
- Elizabeth Kumar, Deputy Commissioner, Human Resources Administration, Office of Child Support Services

Issue # 5: Additional DSS Equity Work Related to Dignity-Centered Treatment and Client Respect

DSS continues to make ongoing systematic changes to reform social services policies and practices, improve technology to make benefits and services more accessible, streamline the ways in which rental arrears are processed and paid, and provide reasonable accommodations for clients with disabilities – all of which are aimed at improving the experiences of our clients, who are majority individuals of color. Most recently, DSS implemented several actions to ensure that service delivery for clients aligns with agency values to treat clients with dignity and respect following the unacceptable incident at HRA's DeKalb Job Center on December 7, 2018, which culminated in the arrest of an HRA client.

Following this incident, DSS immediately implemented the following action items:

- DSS reinforced guidelines for staff to treat clients with courtesy and respect.
- DSS conducted retraining sessions for all HRA Peace Officers, with an emphasis on techniques for deescalating disputes in HRA Centers. This will be a mandatory annual requirement for each officer.
- DSS directed the City's contracted security services vendor to provide retraining sessions for all security guards assigned to HRA Centers, with an emphasis on techniques for deescalating disputes in HRA Centers. Thereafter, this training will be a mandatory annual requirement for any contracted security officer assigned to an HRA office.
- DSS developed and implemented de-escalation training for program staff.

- Agency policy was updated to reflect that HRA Peace Officers shall not request the intervention of the NYPD without first contacting the Center Director or Deputy Director or her/his designee to attempt to defuse the situation by addressing a client need.
- DSS is implementing a social worker pilot at one Job Center in each of the five boroughs to support the Center Directors in defusing such situations and addressing client needs to test the effectiveness of this model at these five centers.
- All HRA Peace Officers will be outfitted with body worn cameras.
- As discussed in a previous section, in addition to existing DSS client service staff training, DSS will begin implementing trauma-informed service delivery and anti-bias training for all 17,000 DSS staff members to promote diversity in the workplace and dignity-centered client services.
- With support from the Open Society Foundation, DSS hosted a Racial Disparities Summit for leadership, key partners and stakeholders.
- Finally, together with the NYPD Commissioner, DSS took the following actions:
 - The NYPD and DSS have developed a protocol for determining appropriate instances in which HRA Peace Officers in HRA Centers should seek the assistance of the NYPD.
 - The NYPD has developed a protocol to deploy an NYPD supervisor to be part of the NYPD response team for such HRA assistance requests.
 - The NYPD and DSS have developed a protocol for transferring control of an incident to the NYPD when the NYPD arrives at an HRA Center.

^[1] Bierie, D. M. (2014). Fugitives in the United States. *Journal of Criminal Justice*, 42(4), 327-337. <u>https://www.sciencedirect.com/science/article/pii/S004723521400049X</u>

^[2] Johnson, R. R., Klahm, C. F., & Maddox, H. G. (2015). An exploratory analysis of time Lapses in serving arrest warrants: A focal concerns and disproportionate contact approach. *Criminal Justice Review*, 40(4), 470-487. http://journals.sagepub.com/doi/abs/10.1177/0734016815596043

^[3] Guynes, R., & Wolff, R. (2004). *Un-served arrest warrants: An exploratory study*. Washington, DC: National Institute of Justice. <u>http://ilj.org/publications/docs/Unserved_Arrest_Warrants.pdf</u>

^[4] Johnson, R. R., Klahm, C. F., & Maddox, H. G. (2015). Ibid.

¹⁵ Goldkamp, J. S., & Vilcica, E. R. (2008). *Targeted enforcement and adverse system side effects: The generation of fugitives in Philadelphia. Criminology*, 46, 371–409. <u>https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1745-9125.2008.00113.x</u>

^[6] Johnson, R. R., Klahm, C. F., & Maddox, H. G. (2015). Ibid

^[7] Bierie, D. M. (2014). Ibid.

^[8] Guynes, R., & Wolff, R. (2004). Ibid.

^[9] Bierie, D. M. (2014). Ibid.

^[10] Goffman, A. (2009). On the run: Wanted men in a Philadelphia ghetto. American Sociological Review, 74(3), 339–357. <u>http://journals.sagepub.com/doi/abs/10.1177/000312240907400301</u>

^[11] National Coalition for the Homeless and the National Law Center on Homelessness & Poverty. (2006). *A dream denied: The criminalization of homelessness in U.S. cities*. Retrieved October 23, 2018 from https://www.nationalhomeless.org/publications/crimreport/report.pdf

^[12] Goffman, A. (2009). Ibid.
 ^[13] Sekhon, N. (2018). Dangerous warrants. *Washington Law Review*, 93, 967-1017.
 <u>http://digital.law.washington.edu/dspace-law/bitstream/handle/1773.1/1810/93WLR0967.pdf</u>

^[14] Gross, C. (July 21 2017). New York 1. Advocates: NYPD conducts warrant sweeps in some homeless shelters.
 Retrieved October 23, 2018 from <u>http://www.ny1.com/nyc/all-boroughs/politics/2017/07/20/claims-warrant-sweeps-nyc-homeless-shelters-against-city-policy</u>
 ^[15] Gross, C. (July 21 2017). Ibid

^[15] Gross, C. (July 21 2017), Ibid.

^[16] Kneebone, E. & Reeves, R.V. (Apr. 21, 2016). The intersection of race, place, and multidimensional poverty. Brookings Institute. Retrieved October 24, 2016 from <u>https://www.brookings.edu/research/the-intersection-of-race-place-and-multidimensional-poverty/</u>

^[17] Chambliss, W. J. (1994). Policing the ghetto underclass: The politics of law and law enforcement. *Social Problems*, 41, 177–194.

https://heinonline.org/HOL/LandingPage?handle=hein.journals/socprob41&div=19&id=&page= [18] Sekhon, N. (2018). Ibid.

^[19] Ryley. S. (Aug. 4, 2014). *Daily News analysis finds racial disparities in summonses in 'broken windows' policing*, New York Daily News. Retrieved October 23. 2018 from <u>http://www.nydailynews.com/new-york/summons-broken-windows-racial-disparity-garner-article-1.1890567</u>

^[20] Sekhon, N. (2018). Ibid.

^[21] Casey, R., Goudie, R., & Reeve, K. (2008). Homeless women in public spaces: Strategies of resistance. *Housing Studies*, 23(6), 899-916. <u>https://www.tandfonline.com/doi/abs/10.1080/02673030802416627</u>

^[22] Sheehan, R. (2010). 'I'm protective of this yard': long-term homeless persons' construction of home place and workplace in a historical public space. *Social & Cultural Geography*, *11*(6), 539-558. https://www.tandfonline.com/doi/abs/10.1080/14649365.2010.497912

^[23] Bergamaschi, M., & Francesconi, C. (1996). Urban homelessness: The negotiation of public spaces. *Visual Studies*, *11*(2), 35-44.

https://www.tandfonline.com/doi/pdf/10.1080/14725869608583764?needAccess=true

^[24] National Coalition for the Homeless and the National Law Center on Homelessness & Poverty. (2006).Ibid.