

New York State Citizen Review Panels for Child Protective Services

20 ANNUAL 23 REPORT

From Intrusion to Empowerment

Urgent Call for Change in Child Protection Practices

New York State Citizen Review Panels for Child Protective Services

The New York State (NYS) Citizen Review Panels (the Panels) for Child Protective Services (CPS) are important conduits for informed public input and provide an external perspective on the efficacy of New York State's child protective policies, practices, programs, and fiscal priorities.

Panel members, appointed by the Governor or the NYS Legislature, are volunteers with a breadth of experience and knowledge in child welfare practice, policy, law, social work, education, and technology, among other areas. Each of the three Panels has up to 13 members. Of those members, the Governor appoints seven, and the Senate Temporary President and Speaker of the Assembly appoint three each.

The Western Panel covers the 17 counties in the western region of the state. The New York City Panel covers the five boroughs of New York City. The Eastern Panel covers the remaining 40 counties.

The Panels are authorized by both state and federal law to examine policies, procedures, and practices at both the state and local levels, and, where appropriate, to review the outcomes of specific cases. The Panels are authorized to hold public hearings and to evaluate the extent to which agencies are effectively discharging their child protection responsibilities. The Panels have reasonable access to public and private facilities receiving public funds to provide child welfare services within each Panel's jurisdiction.

The Panels also advocate for legislation that can have a positive impact on child welfare services in NYS. The Panels are active on social media platforms, including Facebook and Twitter, to raise awareness of the issues surrounding child protective services. See below for more information on the Panels' legal role and authority. For summaries of Panel activities and a list of Panel members, refer to the Appendices.

Federal Law and the Citizen Review Panels

The 1996 amendments to the federal Child Abuse Prevention and Treatment Act (CAPTA) require states that receive federal funding under that legislation to create volunteer Citizen Review Panels. The purpose of these Panels is to assess whether state and local agencies are effectively carrying out their child protection responsibilities. The federal statute broadly defines the work of the Citizen Review Panels. The Panels must meet no fewer than once every three months and produce an annual public report containing a summary of their activities and recommendations to improve the child protection system at the state and local levels.

They must evaluate the extent to which the state is fulfilling its child protective responsibilities under its CAPTA state plan by:

- Examining the policies, procedures, and practices of state and local agencies;
- Reviewing specific cases, when warranted; and
- Reviewing other matters the Panel may consider important to child protection that are consistent with Section 106(c)(A)(iii) of CAPTA.

Following the order of federal CAPTA Amendments in 1996, the NYS Legislature passed Chapter 136 of the Laws of 1999, establishing no less than three Citizen Review Panels, with at least one in New York City. The other Panels were established to serve Eastern and Western New York.



Executive Summary

Families and advocates are increasingly frustrated with slow progress in addressing the challenges facing the child welfare system and the harm it creates. There is wide recognition that families are investigated unnecessarily, that poverty is confused with neglect, that implicit bias is pervasive, and that prevention services are underfunded.

The New York State Citizen Review Panels for Child Protective Services (the Panels) are charged with advising and guiding child protection policies and practices. These Panels, composed of experts and stakeholders, are charged by law to, "... evaluate the extent to which the agencies are effectively discharging their child protection responsibilities," (NY Soc. Serv. law § 371-B). New York State has consistently failed to implement Panel recommendations. This lack of action not only undermines the Panels' efforts but also potentially hinders the advancement of equitable child welfare services that are in the best interest of children, families, and communities in New York State. This trend raises concerns about the state's commitment to effective collaboration with advisory bodies. Readers of this Annual Report will note that many of the recommendations are echoes of those from previous years. The Panels have urged changes that could prevent real harm to families from system involvement while also supporting safety and well-being. In the past, the Panels have said these changes were urgent, and yet are still not seeing that their recommendations have been implemented. So, the Panels loudly reiterate their call for swift, thorough, and necessary reforms.



NYS Citizen Review Panels' Recommendations for 2024

The New York State Citizen Review Panels for Child Protective Services (the Panels) strongly urge state leadership to thoroughly review and reflect upon the 20-plus years of recommendations put forth by Panel members in their annual reports. Comprising experts in various relevant fields, including social work, family law, maternal health, and domestic violence, these dedicated individuals have consistently produced detailed and thoughtful reports, providing valuable recommendations over the years. Despite the persistent efforts of the Panels, many recommendations aimed at rectifying harmful practices within the broader child welfare system have gone unheeded.

This year's recommendations, presented by the Panels, serve as a reaffirmation of some of the most crucial steps needed to enhance positive outcomes for New York families. The time is ripe for the implementation of evidence-based practices, backed by purposeful funding and leadership.

In 2024, the Panels advocate for the state to take concerted steps to minimize the reach of the child protection system by reducing the influx of reports sent to Child Protective Services (CPS). The emphasis should be on community support of families so that the impact of poverty is ameliorated and not mistaken for neglect. The specific recommendations are as follows:

- Restore the 75% rate of reimbursement to local governments for preventive services;
- Universalize Home Visiting Programs by ensuring at least two home visits for every newborn child, continuing for up to two years as mutually agreed upon by the parents and the Home Visiting Agency;
- Reduce child poverty with attention to racial equity by strengthening the Empire State Child Credit. Ensure the maximum tax credit reaches the poorest New Yorkers, who are currently excluded from the full credit, and increase the credit amount to meaningfully impact family budgets^{*};
- Restrict Child Protective Services (CPS) interviews at public schools unless a court order is obtained; and
- Provide Miranda-type warnings for parents during CPS interviews, coupled with the provision of legal counsel from the outset of investigations, to ensure fair and consistent procedures.

The Panels fervently hope that these proposals will receive the attention and commitment necessary for their successful implementation, thereby advancing positive change for New York families.



^{*} The Child and Family Wellbeing Action Network. November 2023. Child Welfare Summit 2023: Shared Policy Priorities for 2024 and Beyond. <u>https://scaany.org/wp-content/uploads/2023/11/Child-Welfare-summit-priorities-program-final-10312023.pdf</u>

From Intrusion to Empowerment: Urgent Call for Change in Child Protection Practices

Narrowing the front door to the child welfare system — or the family policing system as it is known to advocates and impacted parents — endures as a theme of the Panels' recommendations for 2024. Extensive evidence has revealed the traumatic, intrusive nature of many policies and practices within the system here in New York State. An astonishing 76% of reports made to Child Protection Services (CPS) were unfounded in 2022, meaning three quarters of families subjected to investigations suffered through the process unnecessarily. Of the 148,087 reports made to the Statewide Central Register (SCR) that year, over 74% were made by mandated reporters (OCFS, 2022). All too often, symptoms of poverty are mistaken for abuse or neglect, resulting in vulnerable families in need of financial support and accessible services instead being harassed or even separated. New York State's updated mandated reporter training does address implicit bias and the delineation of poverty and neglect. However, a new training is not enough. Without a requirement that all current mandated reporters take this new training and consistent funding for community-based prevention services, the state evades accountability for persistent unfounded reports. The Panels strongly urge the state to closely evaluate and report out the impact this new training makes on mandated reporting trends. It is vital that the public is aware of the progress being made to best serve families, and transparency is key.

A pro-active approach to reducing the number of children and families investigated by CPS is to provide wrap-around preventive services from the start. New York's home visiting program, Healthy Families New York (OCFS, 2023), provides a critical resource for stressed families, and universalizing this program has been a focus of the Panel's recommendations since 2017. With access to Home Visiting Programs, parents are more likely to access prenatal care, learn how to positively engage with their children, and are more likely to be employed (NHVRC, 2023).

Funds from Title IV-E must be reinvested in preventive services. From the 2021 Citizen Review Panels Annual Report:

Originally offering counties 75% uncapped reimbursement for preventive services, the rate has been reduced in recent years to 65% and again to 62.5%. These reductions are costly to LDSSs and counties and do not promote the use of preventive services. The Citizen Review Panels recommend the statute is reauthorized and state funding restored at 75% to meet the full potential of its purpose by budgeting for the state share for these costs. Working with lawmakers to re-authorize the law and restore the rate to 75% would significantly strengthen families to keep their children safely at home (p. 9).

While there are no current proposals to reauthorize and restore the reimbursement rate to 75%, the Panels' sentiment still stands. No action to support counties with more funds has been made despite years of multiple advocacy groups urging lawmakers to consider this change.

Additionally, strengthening the Empire State Child Credit will help to uplift New York's poorest families. While the changes made to the state budget to extend child tax credits to those under four years old in 2022-23 were beneficial, more must be done. As it currently stands, New York's poorest families are excluded from this credit. Advocacy group New York Can End Child Poverty writes, "... child tax credits lose their poverty fighting power when the full benefits are denied to the lowest income households," (2023).



A study spanning all U.S. states during fiscal years 2010–2017 found that each additional \$1,000 spent per person living in poverty was associated with lower instances of maltreatment reporting, substantiated reports, foster care placements, and fatalities (Puls et. al., 2021).

From our 2022 report:

There are 11.6 million children under the age of 18 living in poverty in the United States (Child Poverty in America – facts, statistics 2022). Advocates, including the Panels, believe that putting funds into the hands of struggling families is a must. Family poverty is a known risk factor for child abuse, contributing to parental distress and a decreased ability to provide for children's basic needs (Kovski et al., 2022). A 2022 review of data trends from the 2015 and 2018 tax seasons found that rates of reported child maltreatment declined by 5% in the four weeks following the Earned Income Tax Credit (EITC) and Child Tax Credit (CTC) weekly payments (Kovski et al.) (p. 7).

Strengthening the State Child Credit goes beyond economic considerations; it represents a crucial initiative to nurture the well-being of New York's most vulnerable families, carrying the potential for widespread benefits in terms of child welfare and societal outcomes. When some families are reached by the system, policies must be instated and practices enforced to eliminate the harmful impacts of investigations. For example, interviewing children at school, which is considered a safe space for many, can be threatening to a child and violates the family's confidentiality.

Providing parents and children Miranda-type warnings when an investigator first meets a family is a rising call within the advocacy sphere. Texas is a leader in implementing this mandate. The Imprint reports that Texas child protection investigators are now required to, "give each parent, legal guardian, or other person who is the subject of the investigation a copy of a Notification of Rights form that details more than a dozen rights, including the right to not speak to an investigator without an attorney present or without a court order..." (Sciacca, 2023). The aim of requirements such as this is to properly inform parents of what an interview with CPS implies and to reduce the incidence of trauma.

Panel members would like to leave readers with this: listening to impacted individuals is the only meaningful way towards change and improvement for New York's families. The Citizen Review Panels advocate for fair, equitable, humane interventions by the child welfare system, and a limited scope of intrusion into the bonds of family, only in circumstances where the involvement is absolutely necessary for child safety.



To provide feedback on this report, visit the 2023 Report feedback survey at <u>https://www.surveymonkey.com/r/2023_NYSCRP_Annual_Report</u>.

Or

Scan the QR Code to the left.

Or

Contact the Panels at <u>www.citizenreviewpanelsny.org/contact-us.</u>



Summary of Panel Activities

Welfare Research, Inc., d/b/a WRI Solutions (WRI) provides administrative support to the Panels.

Eastern Panel

March 16, 2023

NYS Office of Children and Family Services (OCFS) delivered updates on various fronts, including the timeline for previously requested Statewide Central Register (SCR) data, guidance on Family First through the Family First Prevention Services Act (FFPSA) dashboard, a new initiative with Families Together in NYS (FTNYS) involving parent advocates in regional offices, and the ongoing review of the 2022 Annual Report. Following this, Brad Hansen from FTNYS shared information about their collaborative initiatives with OCFS, highlighting a pilot program in Erie County involving advocates assisting parents in the child welfare system. The discussion turned to evaluating the effectiveness of this program, prompting the Panel to submit a letter to OCFS recommending an evaluation. The Panel then reviewed highlights from the Executive Budget, noting areas of concern such as the absence of an increase in the Child Tax Credit for certain demographics. Positive feedback was given for mental health sector allocations. Members also expressed surprise at the high percentage of deficiencies in casework practices revealed by the Office of the New York State Comptroller (OSC) audit of OCFS, particularly in service offerings. WRI updated members on social media efforts and ongoing work to enhance the CRP website. Panel members debriefed and discussed plans for future meetings. The meeting was adjourned.

May 4, 2023

The meeting began with a discussion with Crystal Charles, Senior Policy Analyst from the Schuyler Center for Analysis and Advocacy (SCAA). Ms. Charles provided legislative updates, including a review of the Executive Budget. She also reviewed SCAA's legislative priorities for the year. OCFS then joined for a discussion with Sara Simon, Regional Director of the Syracuse Regional Office, and Randall Williams, Director of the HEARS Line. Mr. Williams shared an informational slideshow outlining the origins and purpose of the HEARS family line. The line assists parents and families by providing resources and referrals to a variety of services. Caring representatives guide people to services including food, clothing, housing, medical and behavioral health services, and parent and educational care. High-volume counties and partnerships of resources were described. Ms. Simon also noted her oversight capacity and provided updates on Family First. She highlighted the rollout of Family First and Qualified Residential Treatment Program (QRTP) placements. WRI conveyed the Panel Chairs' intention of crafting language to update the Panel's Operating Guidelines. This was initiated due to advocacy efforts, membership needs, and dormant members. A larger discussion on the topic will be held at the Joint Panels meeting in June. Panel members debriefed and discussed plans for future meetings. The meeting was adjourned.

Appendices

September 14, 2023

Panel members discussed a case file they had reviewed earlier in the month, which was sent by community members seeking advice and advocacy. A question was raised considering the best approach for responding to families or taking action, when case specifics are brought to the Panel's attention. Instead of a broad discussion, it was suggested to gather input from other state Citizen Review Panels (CRPs) and create a workbook to guide responses. Next, the Panel discussed holding a potential roundtable to be held this fall. Members favored a focus on addressing immediate challenges faced by professionals in the field and mandated reporter reform. Panel members agreed to make further plans at the next Joint Panels meeting.



Western Panel

March 15, 2023

The meeting commenced with a discussion among Panel members regarding the OSC audit on fatality reports, expressing a desire to review regional reports and address concerns about unreported fatalities. Panel members requested more information on how they could collectively review these reports. OCFS committed to providing additional details in the future. OCFS presented updates on various topics, including previously requested SCR data, guidance on Family First through the FFPSA dashboard, a new collaboration with Families Together in NYS involving parent advocates in OCFS regional offices, and the ongoing review of the 2022 Annual Report. During the debrief, members reiterated their interest in reviewing fatality reports and decided to formalize their request in writing. They also discussed plans for the upcoming year, expressing a desire to continue engaging with local Department of Social Services (LDSS) leadership to better understand regional child welfare needs. WRI shared updates on social media and announced upcoming meeting guests. Panel members debriefed and discussed plans for future meetings. The meeting was adjourned.

May 3, 2023

The meeting began with a discussion with Jason DeSantis, Director of the Child Fatality Review Unit at OCFS. The Director provided an overview of his work and the functions of the Child Fatality Review Unit. After describing the thorough process for reviewing fatalities, Panel members reiterated their request to be involved in some way. It was suggested that the Panel receive the final draft of the fatality review when it is first shared with counties. OCFS stated that they would look into fulfilling this request and directed Panel members to review the public guarterly reports that are hosted on the OCFS website. Panel members then reviewed their ongoing discussions with LDSS leadership in their region. They are interested in working with the New York State Education Department and/or colleges and universities to advocate for a child welfare focus in social work

programs. WRI conveyed the Panel Chairs' intention of crafting language to update the Panel's Operating Guidelines. This was initiated due to advocacy efforts, membership needs, and dormant members. A larger discussion on the topic will be held at the Joint Panels meeting in June. Panel members debriefed and discussed plans for future meetings. The meeting was adjourned.

September 20, 2023

Paul Brady from the New York Public Welfare Association (NYPWA) joined to share the Association's updates and priorities. The discussion focused on an ongoing problem with "cross-system" children and youth, whose needs require that they interact with OCFS, NYS Department of Health, NYS Office for People with Developmental Disabilities, and other agencies. Mr. Brady is learning that many upstate counties are struggling to care for this population. Panel members asked what he was hearing about aftercare. He shared that aftercare, from a financial perspective, is helpful for voluntary agencies and they have the additional reimbursement to support the development of a discharge plan. From a county perspective, the operational perspective seems to be that when they go over the county budgets, counties are not entirely sure what the reimbursement methodology is. Next, the Panel discussed holding a potential roundtable this fall. Panel members agreed to make further plans at the next Joint Panels meeting.

New York City Panel

March 9, 2023

OCFS provided updates on various topics, including the status of previously requested SCR data, information on Family First through the FFPSA dashboard, a new collaboration with Families Together in NYS involving parent advocates, and the ongoing review of the 2022 Annual Report. Due to low attendance, the remaining agenda items were postponed for discussion in a future meeting, and the meeting was adjourned.



May 11, 2023

The meeting began with a discussion with Kristin Gleeson, Associate Commissioner, regarding mandated reporting and new trainings. Ms. Gleeson described an effort towards a "softer approach" for training mandated reporters. She explained that in tandem with the new training for mandated reporters, they are encouraging the use of the new HEARS line to connect families to the services they need. It was noted that if the staff of the SCR receives a call from a mandated reporter about a family requiring services, staff will do warm transfers to the HEARS line; a report is not always created. Next, Nora McCarthy, Director of the Family Policy Project, joined for a discussion. She provided background on her organization and described the data and research reports available on their website. WRI conveyed the Panel Chairs' intention of crafting language to update the Panel's Operating Guidelines. This was initiated due to advocacy efforts, membership needs, and dormant members. A larger discussion on the topic will be held at the Joint Panels meeting in June. Panel members debriefed and discussed plans for future meetings. The meeting was adjourned.

October 16, 2023

The planned Fall meeting of this Panel was cancelled by the Panel Chair. To meet statutory requirements, another meeting was scheduled and held, but the Chair did not attend. The Panel members who attended discussed concern for the future of the Panel's work. The meeting was adjourned.

Joint Panels

June 15, 2023

The meeting began with a presentation from Kate Wurmfeld and Susan Chinitz from the Center for Justice Innovation. They described the Strong Starts Court Initiative, which supports young children and their families who are in New York City Family Court due to allegations of abuse or neglect. This initiative was first piloted in the Bronx in 2015, Queens in 2016, Staten Island in 2018, Brooklyn in 2021, and Manhattan and Westchester in 2022. Panel members next discussed plans for the meeting with OCFS leadership scheduled for June 30. Panel members agreed to a change in the Operating Guidelines regarding Panel membership and participation. The Chairs will work on a new draft to be shared and voted on by all members. WRI provided updates on legislation, new Extraordinary Level of Care regulations, and the new website for the CRP. Panel members debriefed and discussed plans for future meetings. The meeting was adjourned.

October 19, 2023

Panel members began by exploring ways to reinvigorate the Panels, seeking solutions to low participation from current members and the slow process of adding new ones. Reviewing the opinion from OCFS on their new operating guidelines regarding members who had been inactive, Panel members made alternative plans to reach out to all members to attempt to secure greater involvement. Next, members made plans for the annual report, recommendations, and meeting topics for the upcoming year. Drafted recommendations will be reviewed at a meeting later this fall. A vote was made to hold all Joint Panel meetings in 2024. Panel members believe their best work and conversations occur as a Joint Panel. Regional meetings will be held on an ad-hoc basis. WRI provided updates about a member survey to collect schedule information which was shared after the meeting. Follow-up tasks for WRI also included contacting leadership in the Senate and Assembly to schedule meetings about the Panel member appointment process. Panel members debriefed and discussed plans for future meetings. The meeting was adjourned.



Citizen Review Panel Members 2023

Eastern Panel

Eunju Lee PhD, Panel Chair

Associate Professor School of Social Welfare SUNY Albany Appointed by the Assembly

Mary McCarthy, PhD, LMSW Panel Vice Chair

Director, Social Work Education Consortium School of Social Welfare SUNY Albany Appointed by the Senate

Sharon M. Chesna (retired)

Former Executive Director Mothers & Babies Perinatal Network of South Central New York, Inc. *Appointed by the Governor's Office*

Kathleen Thornton Halas Executive Director Child Care Council of Westchester, Inc. Appointed by the Assembly

Maureen McLoughlin, Esq. Attorney Adjunct Professor Hofstra University Appointed by the Governor's Office

JoAnn Merriman, MS, PA-C Physician Assistant Community Care Physicians *Appointed by the Governor's Office*

Erin Christopher-Sisk, PhD Clinical Director ECS Psychological Services *Appointed by the Senate*

Carrie Jefferson Smith Associate Professor School of Social Work Syracuse University *Appointed by the Governor's Office*

Kellyann Kostyal-Larrier Executive Director Fearless! Hudson Valley, Inc. *Appointed by the Senate*

New York City Panel

David J. Lansner, Esq. *Panel Chair* Partner Lansner & Kubitschek *Appointed by the Assembly*

Dr. Jocelyn Brown *Panel Vice Chair* Director, Child Advocacy Center Columbia Presbyterian Medical Center *Appointed by the Governor's Office*

Wayne Ho President/CEO Chinese-American Planning Council Appointed by the Governor's Office

Sania Andrea Metzger, Esq. Director of Policy Casey Family Services Appointed by the Assembly

Carole Levy, Esq. Attorney-at-Law *Appointed by the Assembly*

Mathea C. Rubin Parent New York City Appointed by the Senate

Jorge Saenz de Viteri Region II Training and Technical Assistance Coordinator STG International, Inc. Appointed by the Governor's Office

Karen Steinberg, Esq. Attorney-at-Law Steinberg & Ross Appointed by the Senate

Marion White

Senior Program Director (Retired) New York Foundling Child Abuse Prevention Program (CAPP) Appointed by the Governor's Office

Western Panel

Todd Sage, Panel Chair Clinical Associate Professor School of Social Work University of Buffalo *Appointed by the Assembly*

Linda C. Brown, CSW (retired) Former Assistant Commissioner New York State Office of Children and Family Services *Appointed by the Assembly*

Sarlyn Tate

Social Worker Buffalo Psychiatric Center Appointed by the Governor's Office

Melissa A. Cavagnaro, Esq. Partner Mattingly Cavagnaro LLP Matrimonial & Family Law Appointed by the Senate

Ellen T. Kennedy Associate Professor Emerita School of Social Work Buffalo State College *Appointed by the Governor's Office*

John Treahy President Treahy Consultation Services LLC *Appointed by the Senate*



Panel Membership

All new members participate in a virtual orientation session and receive orientation materials.

Efforts were made during 2023 to reach out to Legislative and Executive Branch leaders and staff to raise awareness of the Panels and the process for appointment. Vacancies remain on all three panels, however, and the Panels continue to seek new candidates to apply for appointment. For an up-to-date list of vacancies, visit the Panels' membership lists at:

http://www.citizenreviewpanelsny.org/who-we-are

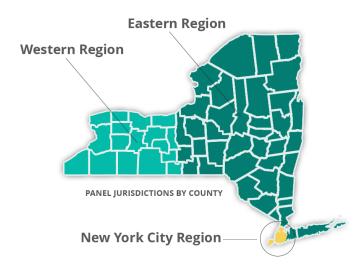
Potential members may self-nominate; be recommended by a current Panel member or other community leader; or be nominated directly by the NYS Senate, NYS Assembly, or the Office of the Governor. A letter of interest and resume must be submitted to a State Senator, State Assembly member, or the Office of the Governor. When an individual seeks appointment by the New York State Legislature, the appointment must be approved by the Temporary President of the Senate or the Speaker of the Assembly.

While the Panels strive for volunteer members who broadly represent the communities in which the Panels are established, no person currently employed by federal, state, county, or municipal agencies that directly deliver child welfare services may be a Panel member.

The Panels continually strive for diversity in their membership in these areas:

- Geographic location within New York State including rural, suburban, and urban areas;
- Experience related to the child welfare system including professional experience or lived experience (birth parent, foster parent, relative, or former youth in care); and
- Knowledge base such as advocacy, technology, education, law, and program development and evaluation.

For more detailed information on the appointment process, a sample letter of interest, and description of member responsibilities, visit <u>http://www.citizenreviewpanelsny.org/recruitment/</u>.



Western: Allegany, Cattaraugus, Chautauqua, Chemung, Erie, Genesee, Livingston, Monroe, Niagara, Ontario, Orleans, Schuyler, Seneca, Steuben, Wayne, Wyoming, Yates

Eastern: Albany, Broome, Cayuga, Chenango, Clinton, Columbia, Cortland, Delaware, Dutchess, Essex, Franklin, Fulton, Greene, Hamilton, Herkimer, Jefferson, Lewis, Madison, Montgomery, Nassau, Oneida, Onondaga, Orange, Oswego, Otsego, Putnam, Rensselaer, Rockland, Saratoga, Schenectady, Schoharie, St. Lawrence, Suffolk, Sullivan, Tioga, Tompkins, Ulster, Warren, Washington, Westchester

New York City: Manhattan, Bronx, Brooklyn (Kings County), Queens, Staten Island (Richmond County)



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New York State Citizen Review Panels for Child Protective Services

For further information, please visit the Panels' website at www.citizenreviewpanelsny.org or contact: Welfare Research, Inc. d|b|a WRI Solutions 14 Columbia Circle, Suite 104 Albany, NY 12203 (518) 713-4726

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