

February 16, 2024

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

**EXECUTIVE SUMMARY**

**ALL COUNTY INFORMATION NOTICE NO. I-06-24**

This letter introduces the evaluation of the Commercially Sexually Exploited Children Program established through [Senate Bill 855](#). This evaluation was completed by The University of California, Berkeley, California Child Welfare Indicators Project, and Urban Institute in July 2023. A link to the full report, *Evaluating California's Efforts to Address the Commercial Sexual Exploitation of Children* is included.



KIM JOHNSON  
DIRECTOR

CALIFORNIA HEALTH & HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
744 P Street • Sacramento, CA 95814 • [www.cdss.ca.gov](http://www.cdss.ca.gov)



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GOVERNOR

February 16, 2024

ALL COUNTY INFORMATION NOTICE NO. I-06-24

TO: ALL COUNTY CHILD WELFARE DIRECTORS  
ALL CHIEF PROBATION OFFICERS  
ALL FOSTER CARE MANAGERS  
ALL CHILD WELFARE SERVICES PROGRAM MANAGERS  
ALL TITLE IV-E AGREEMENT TRIBES  
ALL FEDERALLY RECOGNIZED TRIBES  
ALL COUNTY BOARDS OF SUPERVISORS

SUBJECT: EVALUATING CALIFORNIA'S EFFORTS TO ADDRESS THE  
COMMERCIAL SEXUAL EXPLOITATION OF CHILDREN: AN  
EVALUATION OF THE COMMERCIALLY SEXUALLY EXPLOITED  
CHILDREN PROGRAM ESTABLISHED THROUGH SENATE BILL  
855.

REFERENCE: [PENAL CODE SECTION 11165.1](#);  
[PENAL CODE SECTION 236.1 \(c\)](#);  
[WELFARE AND INSTITUTIONS CODE SECTION 16501.35](#);  
[SENATE BILL 855 \(CHAPTER 29, STATUTES OF 2014\)](#);  
[WELFARE AND INSTITUTIONS CODE SECTIONS  
16524.6-16524.11](#)

The purpose of this All County Information Notice (ACIN) is to provide all county child welfare and probation agencies, federally recognized Tribes in California, and other interested parties a link to the full report: [Evaluating California's Efforts to Address the Commercial Sexual Exploitation of Children](#) on Urban Institute's web site.

## **BACKGROUND**

The commercial sexual exploitation of children refers to a range of crimes and activities involving the sexual abuse or exploitation of a child for the financial benefits of any person in exchange for anything of value (including monetary and non-monetary benefits). The term "commercial sexual exploitation" is defined in [Penal Code section 11165.1](#) as the application of [Penal Code 236.1 \(c\)](#) regarding the sexual trafficking of a

child, and can include “provision of food, shelter, or payment to a child in exchange for the performance of any sexual act.” Youth who are victims of commercial sexual exploitation (CSE) are often forced, coerced, and threatened to perform these acts. As a result, these youth experience severe and complex trauma, which impacts their physical, emotional, and mental health, leading to difficulty in achieving stability. Youth who have experienced commercial sexual exploitation may have heightened clinical and emotional needs. These may include a need for more intensive and comprehensive medical, mental health, behavioral health, reproductive health, substance use treatment and social supports. Youth with documented concerns of CSE are primarily female, English-speaking and people of color. Including but not limited to American Indian / Alaska Native (AI/AN) women and girls that go missing, and are trafficked, at disproportionately higher rates than others.<sup>1</sup>

[Welfare and Institutions Code section 16501.35](#) requires county placing agencies to implement policies and procedures that identify youth who are, or are at risk of becoming, victims of commercial sexual exploitation and determine whether the youth is a possible victim of commercial sexual exploitation if they are missing from foster care.

To support counties in their efforts towards improving outcomes for minors who are victims of or vulnerable to CSE, California enacted [Senate Bill \(SB\) 855 \(Chapter 29, Statutes of 2014\)](#). The SB 855 established the county optional Commercially Sexually Exploited Children (CSEC) Program, described in [Welfare and Institutions Code sections 16524.6-16524.11](#) and administered by the California Department of Social Services (CDSS). This county child welfare agency opt-in program provides funding to participating counties for the purpose of providing education, training, prevention, and intervention services to children identified as victims or at risk of becoming victims of CSE. The CDSS provides technical assistance to those counties who choose to participate in the CSEC Program and develop protocols aimed at addressing the needs of youth who have experienced CSE. The CSEC Program requires the use of a multidisciplinary approach when serving commercially sexually exploited youth, recognizing that the nature of child sex trafficking requires a coordinated and collaborative response in order to effectively address the challenges these youth experience.

To better understand the effectiveness of SB 855, the CDSS contracted with the University of California (UC) Berkeley to conduct an in-depth evaluation of California’s CSEC program. The UC Berkeley partnered with the Urban Institute to complete the evaluation. The full evaluation, *Evaluating California’s Efforts to Address the Commercial Sexual Exploitation of Children*, as well as its appendices are attached to this ACIN.

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<sup>1</sup>Urban Indian Health Institute, Seattle Indian Health Board (2018). [Missing and Murdered Indigenous Women & Girls](#)

## **INTRODUCTION:**

The evaluation consists of two main components, an implementation study and outcome study. The implementation component of the evaluation was completed by the Urban Institute and the outcome study was completed by UC Berkeley – California Child Welfare Indicators Project (CCWIP).

The implementation study was designed to:

- Describe the extent to which SB 855's core components are being carried out;
- Examine the variation in how the policy is being applied across participating counties; and
- Identify promising practices and major challenges.

Data for the implementation study was pulled from:

- Annual county program plans
- CSEC program administrator survey
- Interviews with agency and provider staff
- Focus groups with adults who experienced CSE during childhood

12 in depth county case studies:

- Staff from Urban Institute visited the 12 counties between November 2022 and February 2023. This included 9 in person visits and 3 virtual.
- The CDSS was interested in understanding how counties engage Tribes in their CSEC program implementation. Tribal engagement documented in the county plans and / or survey responses were considered when making county selections for the 12 county case studies.

The outcome study examined:

- Child welfare system involvement and outcomes of youth who met the state's definition of CSEC both before and after the implementation of the CSEC Program through SB 855.

Information that described child welfare system events that were experienced by young people who met California's definition of CSEC or were identified as being at heightened risk of experiencing CSE was pulled from:

- Statewide administrative database – Child Welfare Services / Case Management System (CWS/CMS).

Among the measures examined for the outcome study were:

- Identification of CSEC along with documentation practices
- Revictimization
- Case involvement
- Foster care placement trajectories

### **OVERVIEW AND KEY FINDINGS:**

The evaluation highlights key findings from both the implementation study and the outcome study in the executive summary and the body of the evaluation. Some of the key findings and overall themes gleaned from the evaluation are listed below:

- Screening inconsistencies statewide lead to impacted data and limits in interpreting available data;
- Majority of youth impacted by CSE had low placement instability. Although youth had relatively stable placements, the data does not reflect absences from placement that fall short of a placement change. While this is positive, youth impacted by CSE still experienced significant placement disruptions;
- Majority of youth impacted by CSE were victimized prior to care with only one in ten young people with CSE concerns being in care at the time of identification of these concerns;
- Average age of children at time of initial CSE concerns was 12 years;
- Need for more specific trainings and an emphasis on training for parents, relative caregivers, and foster parents;
- Significant amount of youth impacted by CSE are placed with relative caregivers;
- Lack of available services, specifically lack of CSEC-informed behavioral health services;
- Counties are limited in their ability to serve youth impacted by CSE without an open child welfare case.

### **BEST / PROMISING PRACTICES:**

The evaluation also provides best / promising practices that were learned from counties through the implementation and outcome studies. Some of these best / promising practices are:

- Assigning CSE cases to specific frontline workers rather than distributing them throughout the workforce;
- Weighting CSE cases more heavily when calculating caseloads against burnout by acknowledging that such cases are more work intensive;
- Dual response from child welfare and CSE advocates;

- On-staff clinicians with a specialization in working with youth who have experienced CSE, and staff dedicated to recovering missing youth;
- Partnering with outside organizations is effective in engaging vulnerable youth who are not currently Child Welfare involved.

Best / promising practices in engaging and involving Tribes in the implementation of County CSEC Programs were identified by several counties and are included in the evaluation and appendix. Some of those best / promising practices are:

- Development and implementation of the Protocol for Working with Indian Families, Children and Tribes in partnership with local Tribes;
- A representative from the local Tribe is invited to all Multi-Disciplinary Team meetings that involve an AI/AN youth;
- A county is part of the Bay Area Collaborative of American Indian Resources, a partnership with the AI/AN community, service providers, and local elders.

### **POLICY AND PRACTICE RECOMMENDATIONS:**

Through the key findings and promising practices shared in the evaluation, the CDSS will be working closely with our county and community partners, tribal partners, and colleagues with lived experience to develop and implement policy and practice recommendations. Below are some of the possible recommendations we intend to explore further:

- Improve identification practices in an effort to promote equity, reduce bias, and decrease time before identification;
- Improve access to and use of lived experience expertise and voice for county child welfare agencies and their partners to inform their programs;
- Improve access to targeted secondary trauma support for county CSEC Program staff;
- Enhance training and technical assistance to support the implementation of harm reduction for county child welfare agencies and their multidisciplinary partners, including community organizations;
- Enhance prevention and differential response capacities and strategies;
- Explore innovative approaches to placement;
- Build CSE expertise among behavioral health partners through increased state and local level partnerships;
- Continue to work with Child Welfare Digital Services (CWDS) to develop measures to track data and demonstrate outcomes in the Child Welfare Services – California Automated Response and Engagement System (CWS-CARES) that better align with the trajectories of youth impacted by CSE;
- Continue encouraging County partners to engage local Tribes to ensure a Tribal perspective is included in not only their CSEC program implementation, but also

their ongoing work and understanding of the impacts of CSE on the AI/AN community;

- Continue to explore ways to promote service continuity to ensure youth impacted by CSE can maintain relationships with trusted individuals;
- Continue to support counties in developing best practices in developing and implementing policies and procedures to locate and serve youth missing from care;
- Promote prevention practices to prevent youth who are vulnerable to CSE from becoming victims;
- Ensure Juvenile Justice involved youth have access to the same services and supports as dependents.

These policy and practice recommendations, if implemented, will be utilized to move the work of the CSEC program towards incorporating the [California Health and Human Services Agency: Guiding Principles and Strategic Priorities](#). Some of these principles and priorities are listed below:

- Improve the Lives of California's Most Vulnerable
- Advance the Well Being of Children and Youth
- Focus on Equity
- See the Whole Person
- Deliver on Outcomes

### **ACKNOWLEDGEMENTS:**

The CDSS would like to thank the staff of UC Berkeley CCWIP as well as their partners at the Urban Institute for their work on this evaluation. We are also grateful to our colleagues in the CDSS – Research Automation and Data Division that assisted in providing support in the research for this evaluation.

The critical guidance and feedback which was provided to the research team by the Child Welfare Council's CSEC Action Team and Preventing and Addressing Child Trafficking program of the Child and Family Policy Institute of California is greatly appreciated.

The CDSS would like to thank the lived experience experts that informed the study through their participation in focus groups. Special thanks to our colleagues with lived experience Alia Azariah, Cari Herthel, and Tkeyah Dupclay as well as the CSEC Action Team's Advisory Board all of whom collaborated closely with UC Berkeley CCWIP and Urban Institute in implementing the evaluation, assisting in interpreting the findings, and presenting these findings.

**QUESTIONS:**

If you have questions or need additional guidance regarding the information in this information notice, contact the Child Trafficking Response Team within the Family Centered Safety and Support Bureau at (916) 651-6160 or [CSECPprogram@dss.ca.gov](mailto:CSECPprogram@dss.ca.gov).

Sincerely,

***Original Document Signed By***

CHERYL TREADWELL, Chief  
Safety, Prevention and Early Intervention Branch  
Children and Family Services Division

cc: County Welfare Directors Association  
Chief Probation Officers of California