



THE CITY OF NEW YORK  
OFFICE OF THE COMPTROLLER  
SCOTT M. STRINGER

May 22, 2019

Susan Herman  
Senior Advisor and Director, Mayor's Office of ThriveNYC  
City Hall  
New York, NY 10007

Dear Ms. Herman:

Thank you for the timely responses to my letters of March 1<sup>st</sup>, 2019 and March 25<sup>th</sup>, 2019. The goal of comprehensively addressing the mental health needs of New Yorkers is one we both share, and I commend the Administration for prioritizing an issue that for too long has been neglected. That said, as Comptroller, it is my job to ensure that taxpayer dollars are spent wisely and efficiently. While I recognize the complexity of addressing the mental health needs of a population as large as New York City's, the provision of these services should not come at the expense of transparency and accountability.

My office has reviewed the information you provided. We have drawn preliminary conclusions regarding ThriveNYC and would like to share our observations and recommendations. I urge the Office of ThriveNYC to take the steps outlined below to improve the foundation for comprehensive mental health care in the City and shore up public confidence that taxpayer funds are reaching communities in need.

**1) The shifting list of ThriveNYC programs over time highlights the need for a clear definition of ThriveNYC's purpose and criteria, and its place within the larger framework of the City's mental health services.**

The programs that are considered part of ThriveNYC have changed over time, and the relationship of certain of these programs to ThriveNYC is unclear. *ThriveNYC: A Mental Health Roadmap for All*, released in November 2015, presented 54 initiatives, including 31 existing programs and 23 new ones.<sup>1</sup> A review and comparison of ThriveNYC's original four-year budget as presented by the Independent Budget Office in February 2017 ("original budget") with the budget you provided to my Office in March 2019 ("updated budget") reveals that only 32

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<sup>1</sup> Office of the New York City Mayor, *Fact Sheet for ThriveNYC: A Mental Health Roadmap for All* (November 2015) (<https://thrivenyc.cityofnewyork.us/wp-content/uploads/2018/02/ThriveNYC-3.pdf>); see also <https://www1.nyc.gov/office-of-the-mayor/news/874-15/fact-sheet-thrivenyc--mental-health-roadmap-all>.

programs were contained in both the original and current budgets (a list is provided in Attachment A).<sup>2</sup>

A closer review of the programs that were not included in both budgets uncovers serious questions about the scope and mission of ThriveNYC and its role in providing support or oversight to the City's mental health programs. Among the 22 programs that did not appear in both budgets, 11 were excluded from both the original budget and the updated budget. Of these programs:

- Eight received minimal or no funding;
- Two received funding through other budgeted initiatives;<sup>3</sup>
- One – NYC 15/15 Supportive Housing for Vulnerable New Yorkers – was excluded from the ThriveNYC budget because it was considered “beyond the scope of what is typically considered a mental health initiative.”

The remaining 11 programs were included in either the original budget or the updated budget, but not both – further highlighting the amorphous scope of ThriveNYC:

- Since the original ThriveNYC Roadmap was published, five programs are no longer included in the updated budget. As detailed in Attachment B, three of these programs provided services for justice-involved populations, including efforts to improve the care and safety of people with behavioral health needs, improved jail discharge planning, and pre-arraignment screening. Given the critical importance of mental health services in the criminal justice system, it is unclear why these programs would not be included as part of ThriveNYC.
- Similarly, funding for the Department of Education's efforts to Improve School Climate and the Department of Health and Mental Hygiene's Integrated Brief Intervention for Substance Misuse Program (SBIRT) was not included in the updated budget. Again, such programs are foundational to mental health support services in the City and it is unclear why these would be distinct from the programs that have remained in the ThriveNYC budget.

Despite being excluded from the updated ThriveNYC budget provided to us, the programs listed above continue to receive City funding, and the Office of ThriveNYC reports metrics related to all of them. For example, according to the data provided to my Office, more than 100,000 people have been screened by the Health+Hospitals Pre-Arraignment Screening Unit (PASU) since

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<sup>2</sup> New York City Independent Budget Office, *Detailing the Expansion of Behavioral Health Services: City-Funded Spending Drives New & Growing Programs Under the Mayor's ThriveNYC Initiative* (February 2017), <https://ibo.nyc.ny.us/iboreports/detailing-the-expansion-of-behavioral-health-services-city-funded-spending-drives-new-growing-programs-under-the-mayor%E2%80%99s-thrivnyc-initiative.html>. A detailed presentation of the original ThriveNYC budget table is available at <https://ibo.nyc.ny.us/iboreports/web-chart-thrive-2017.pdf>.

<sup>3</sup> Two initiatives were combined with other similar initiatives (Veterans Outreach Team Expansion and Veterans Mental Health Holistic Fund became Vets Thrive, while NYC Support and the Mental Health Program Finder became NYC Well), while one was broken into three budgeted programs (Social Emotional Learning).

2015. The omission from the updated ThriveNYC budget leads to confusion about the relationship of PASU to ThriveNYC.

While certain programs are not in ThriveNYC's updated budget, others have been added:

- Six programs that were part of the 2015 ThriveNYC Roadmap but initially excluded from the original budget now appear in the updated budget. Each of these six programs predated ThriveNYC and, according to the Mayor's Office of ThriveNYC's response, at least half did not receive any additional funding from ThriveNYC.<sup>4</sup> Accordingly, it is unclear why they are included in the updated ThriveNYC budget.

The relationship among programs serving similar populations is also unclear. For example, ThriveNYC has oversight responsibility for Mental Health Service Coordination in all Contracted Family Shelters but not for Bridging the Gap social workers who work with homeless students. Evaluation and support for programs serving similar populations should be coordinated. The fact that there is little apparent coordination calls into question what role the Office of ThriveNYC has in program oversight or providing coordination among agency programs (including NYC H+H).

In short, the movement of programs and funds in and out of ThriveNYC raises concerns about the criteria for and analysis behind ThriveNYC's purpose and objectives; about the practical significance of being a ThriveNYC program; and about the coordination between ThriveNYC programs and the City's other mental health programs. The ThriveNYC initiative lacks a clearly articulated framework that would answer questions such as how the populations to be served by ThriveNYC were determined and selected; what standards or guidelines were used to determine what programs would be included in ThriveNYC; and how programs were scaled to meet identified needs.

To define the purpose of the ThriveNYC framework and clarify how specific programs are selected and align to address those needs, I recommend that the Office of ThriveNYC:

- Conduct and make public a comprehensive evaluation of existing mental health services, clarifying how ThriveNYC as an umbrella framework adds value to mental health programs and is filling gaps in existing mental health services. This evaluation should include a clear delineation of the criteria for what programs are and are not part of ThriveNYC, and clarify the role of the Office of ThriveNYC and its relationship with City agencies in oversight and operation of mental health services.

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<sup>4</sup> These six programs, which include Attachment and Biobehavioral Catch- Up (ABC), Trauma Services for Families With Young Children - Group Attachment-Based Intervention (GABI), Cognitive Behavioral Therapy Plus (CBT+), Talk to Your Baby, Early Years Collaborative, and Employment Opportunities for Individuals with Developmental Disabilities, have a total four-year budget of \$38 million over FY 2016 through FY 2019.

## 2) ThriveNYC lacks robust outcome measures focused on assessing the impact of programs and services on the well-being of New Yorkers.

It is critical that the Administration track and publicly report the outcomes of ThriveNYC programs. The Mayor's Office of ThriveNYC's response of April 29<sup>th</sup> indicated that it is employing an established evaluation framework, RE-AIM; intends to release outcome measures for all ThriveNYC programs in June; and will develop population-level measures in time. The response also indicated that the Mayor's Office of ThriveNYC would publicly release all external program evaluations as they are completed, barring any legal restrictions.

However, the fact remains that among the 41 initiatives presented in the updated budget, fewer than half have completed or planned evaluations and only 12 currently have reported outcome measures. While it is certainly necessary to track numbers of trainings held or naloxone kits distributed, it is far more important to have a clear goal in mind for how service delivery will move the needle on changing outcomes for New Yorkers. For example, tracking the number of teachers who have attended a social-emotional learning professional development training is helpful and necessary, but the outcome measure that 99 percent of teachers who have attended these trainings report that their ability to build positive relationships with families was strengthened as a result of the training is far more useful. The latter elevates the role of teachers as partners in the work of creating supportive learning communities for children and their families. It also provides the public an indication of the overall results that can be expected from such programs, presumably stronger home-school relationships for children in pre-K programs. Unfortunately, the lack of outcome measures for so many programs suggests that the Office of ThriveNYC did not thoroughly consider the results to be achieved when the initiative was originally designed.

Of particular concern is a lack of outcome measures for programs that serve people with serious mental illnesses, such as NYC Safe and the not-yet-opened Public Health Diversion Centers. The only identified "outcome" measure for a program that appears to serve the seriously mentally ill is the "percent of clients with service provision" served by the new Co-Response Teams program.<sup>5</sup> For the month of January 2019, the City reported that 83 percent of the population with serious mental illnesses were receiving services. However, no baseline figure or any measure of effectiveness for the services being provided under ThriveNYC was identified.

Even more confounding, public statements suggest that the City is actually tracking some outcome measures related to services for the seriously mentally ill – although these outcome measures were missing from any metrics provided to the Comptroller's Office. For example, in the Year Two ThriveNYC update published in early 2018, the Administration reported that "94 percent of NYC Safe clients in the community have not been charged with a violent offense since being referred to the program."<sup>6</sup> Similarly, the Office of ThriveNYC's testimony before the City Council Budget and Oversight hearing in March 2019 stated another important metric – that

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<sup>5</sup> New joint crisis response teams staffed by mental health professionals and specially trained police.

<sup>6</sup> ThriveNYC Year Two Update, <https://thrivenyc.cityofnewyork.us/wp-content/uploads/2018/02/Thrive-Year-2-Web-Version.pdf>.

95 percent of Co-Response Team contacts have been “successful, leading to many fewer interactions with police and emergency visits to hospitals.”<sup>7</sup> Neither of these metrics was included in the materials submitted to the Comptroller’s Office.

To improve the assessment and evaluation of ThriveNYC programs, I recommend that the Office of ThriveNYC:

- Publicly release the full RE-AIM evaluation roadmap along with proposed outcome measures.
- Include regular updates of all outcome and other measures on the ThriveNYC website, on a consistent schedule.
- Publicly release all summary findings of external evaluations where publication of the full report would be precluded by legal privacy concerns.

### **3) ThriveNYC fails to provide accurate tracking and accounting for spending.**

As originally presented, the plan for ThriveNYC entailed spending \$850 million over four years. The updated budget indicated that the funding allocated for fiscal years 2016 through 2019 was \$743 million, a decrease of \$107 million.<sup>8</sup>

The updated budget information provided by the Administration to my office was a summary which purported to show budgeted and actual spending for fiscal years 2016 through 2018, and budgeted spending for fiscal years 2019 and beyond. Using the structure provided to us in your April 29<sup>th</sup> response, we reviewed actual and budgeted spending in the City’s Financial Management System (FMS) for programs with separate, identified budget codes and found numerous inconsistencies with the budget information the Administration provided, as detailed in Attachment C.

To improve the accounting of ThriveNYC’s budget and spending, I recommend that the Office of ThriveNYC:

- Make available a clear and accurate accounting of ThriveNYC spending on a regular schedule – preferably quarterly to accompany each Financial Plan.

My office was informed during its meeting with ThriveNYC staff on March 19<sup>th</sup> that final spending could only be reconciled after the fiscal year closes. We believe that such a quarterly update is entirely feasible with appropriate reporting from agencies and vendors. Additionally, to

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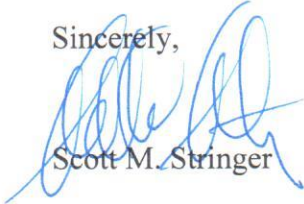
<sup>7</sup> Testimony of Susan Herman before the New York City Council Budget and Oversight Hearings on the Fiscal Year 2020 Preliminary Budget (March 26, 2019), <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=3888869&GUID=35771640-5A93-4736-8F18-F9CDC3FE97CB&Options=&Search=>.

<sup>8</sup> Based on the original ThriveNYC budget as presented by the Independent Budget Office, the original budget included \$35 million in FY 2015.

allow for independent confirmation of budget and spending, separate, identified budget codes should be created for ThriveNYC programs to the greatest extent possible.

Again, I commend the work of ThriveNYC and thank the Mayor's Office of ThriveNYC for its cooperation with my office. I look forward to continuing to work together on this important initiative.

Sincerely,

A handwritten signature in blue ink, appearing to read "Scott M. Stringer", is written over the typed name.

Scott M. Stringer

**Attachment A:  
ThriveNYC Programs Included in Both Original and Updated Budgets**

*(dollars in millions)*

<b>Initiative Name</b>	<b>Labeled as "New" in Roadmap*</b>	<b>Population Served</b>	<b>Current FY16-FY19 Budget**</b>
Mental Health Service Corps	Yes	Behavioral health workforce	\$100
Mental Health Service Coordination in all Contracted Family Shelters	No	Homeless	\$98
NYC Safe	No	Homeless/Serious Mental Illness	\$97
Community School Mental Health Program	No	Public school	\$51
NYC Well	Yes	General	\$37
Crime Victim Assistance Program	No	Crime victims	\$31
School Mental Health Consultant Program	Yes	Public school	\$30
Social-Emotional Learning ECE - Pre-K	Yes	Early childhood	\$26
Diversion Centers	No	Justice-involved	\$25
Expand Access to Naloxone	No	Substance use disorders	\$22
Connections to Care	No	Low-income and at-risk	\$21
NYPD Training and Crisis Intervention Training	No	Justice-involved	\$20
Public Awareness Campaign	Yes	General	\$19
School Mental Health Prevention and Intervention Program	No	Public school	\$19
Mental Health First Aid	Yes	General	\$14
Mental Health and Substance Use Programming for All Youth at Rikers Island and Juvenile Detention Facilities	No	Justice-involved youth	\$13
Mental Health Services in Family Justice Centers	No	Crime victims	\$12
Social-Emotional Learning - Early Childhood Mental Health Network	Yes	Early childhood	\$11
Social-Emotional Learning - Trauma Smart	Yes	Early childhood	\$11
Expansion of Newborn Home Visiting Program	No	Homeless	\$8
Mental Health Services for All Youth in Runaway and Homeless Youth Shelters	No	Homeless	\$8
Friendly Visiting Program	Yes	Elderly	\$5
Geriatric Mental Health Initiative	No	Elderly	\$5
Peer Specialist Training	Yes	Behavioral health workforce	\$4

<b>Initiative Name</b>	<b>Labeled as "New" in Roadmap*</b>	<b>Population Served</b>	<b>Current FY16-FY19 Budget**</b>
Mental Health Innovation Lab	Yes	Research	\$4
Mental Health Training for School Staff	Yes	Public school	\$2
VetsThrive NYC	Yes	Veterans	\$2
Expand Access to Buprenorphine in Primary Care Settings	Yes	Substance use disorders	\$1
CUNY Mental Health Digital Platform	Yes	Public school	\$1
Thrive Learning Center	Yes	Research	\$1
Creating Awareness about Relationship Equality	No	Foster care	\$1
NYC Mental Health Workforce Summit	Yes	Behavioral health workforce	\$0
<b>Total</b>			<b>\$698</b>

NOTES: \*Office of the New York City Mayor, *Fact Sheet for ThriveNYC: A Mental Health Roadmap for All* (November 2015) (<https://thrivenyc.cityofnewyork.us/wp-content/uploads/2018/02/ThriveNYC-3.pdf>); \*\*Budget figures are as of the FY 2020 Preliminary Budget. In the April FY 2020 Executive Budget, the City reduced funding for the Mental Health Service Corps by \$9 million in FY 2019 and moved \$4 million for the Public Health Diversion Centers from FY 2019 to FY 2020, which are not reflected here.

SOURCES: NYC Comptroller's Office analysis of data provided by the Office of ThriveNYC and New York City Independent Budget Office, *Detailing the Expansion of Behavioral Health Services: City-Funded Spending Drives New & Growing Programs Under the Mayor's ThriveNYC Initiative* (February 2017), <https://ibo.nyc.ny.us/iboreports/detailing-the-expansion-of-behavioral-health-services-city-funded-spending-drives-new-growing-programs-under-the-mayor%E2%80%99s-thrivnyc-initiative.html>. A detailed presentation of the original ThriveNYC budget table is available at <https://ibo.nyc.ny.us/iboreports/web-chart-thrive-2017.pdf>.



**Attachment B:****ThriveNYC Programs Included in Original Budget But Excluded from Updated Budget***(dollars in millions)*

<b>Initiative Name</b>	<b>Included in ThriveNYC Roadmap*</b>	<b>Population Served</b>	<b>Original FY16-FY19 Budget**</b>
Reduce Violence and Address Treatment in the City's Jails***	Yes	Justice-involved	\$61
Expand and Enhance Discharge Planning Services	Yes	Justice-involved	\$44
Ensure the City Uses Jail and Diversion Programming Effectively	Yes	Justice-involved	\$29
Improve School Climate	Yes	Public school	\$17
Supportive Housing for People Released from Jail	No	Justice-involved	\$12
Probation Health Services Team	No	Justice-involved	\$5
Integrated Brief Intervention for Substance Misuse Program (SBIRT)	Yes	Substance use disorders	\$4
Substance Use Counselors for Students	No	Public school	\$4
<b>Total</b>			<b>\$176</b>

NOTES: \*Office of the New York City Mayor, *Fact Sheet for ThriveNYC: A Mental Health Roadmap for All* (November 2015) (<https://thrivenyc.cityofnewyork.us/wp-content/uploads/2018/02/ThriveNYC-3.pdf>); \*Budget figures as of February 2017, as reported by Independent Budget Office. \*\*\*The original budget for "Reduce Violence and Address Treatment in City Jails" has been adjusted to exclude funding for Mental Health and Substance Use Programming for All Youth at Rikers Island and Crisis Intervention Team training in city jails. SOURCES: NYC Comptroller's Office analysis of data provided by the Office of ThriveNYC and New York City Independent Budget Office, *Detailing the Expansion of Behavioral Health Services: City-Funded Spending Drives New & Growing Programs Under the Mayor's ThriveNYC Initiative* (February 2017), <https://ibo.nyc.ny.us/iboreports/detailing-the-expansion-of-behavioral-health-services-city-funded-spending-drives-new-growing-programs-under-the-mayor%E2%80%99s-thivnyc-initiative.html>. A detailed presentation of the original ThriveNYC budget table is available at <https://ibo.nyc.ny.us/iboreports/web-chart-thrive-2017.pdf>.

**Attachment C:  
Discrepancies Between Administration-Reported ThriveNYC Spending and Actual Spending in  
the City's Financial Management System**

**Actual FY 2018 Expenditures** *(dollars in millions)*

<b>Agency</b>	<b>Program</b>	<b>FMS</b>	<b>Admin.</b>	<b>Difference</b>
DOHMH	Mental Health First Aid	\$4.62	\$3.56	\$1.06
DOHMH	Mental Health Service Corps	\$26.91	\$28.13	(\$1.22)
DOHMH	Public Health Diversion Centers	\$0.20	\$0.00	\$0.20
DOHMH	NYC Well	\$12.95	\$12.08	\$0.87
NYPD	Crime Victim Assistance Program	\$9.22	\$9.19	\$0.03

SOURCE: Comptroller Office analysis of budget data provided by the Office of ThriveNYC and information in the New York City Financial Management System for units of appropriation, budget and object codes provided by Office of ThriveNYC.