This statement is in response to Automated Inequality by Virginia Eubanks, most specifically to the excerpt printed in Wired Magazine.

The author set out to examine the development and use of the Allegheny Family Screening Tool (AFST), a predictive risk-modeling tool designed to assist with child welfare call-screening decisions in Allegheny County. Consistent with other decisions we have made to promote rigor, transparency and accountability in our implementation of this new tool, we invited the author into our agency.

Unfortunately, the piece has numerous inaccuracies and several key points require correction.

First, the excerpt mischaracterizes the intent and use of the Allegheny Family Screening Tool (AFST). The AFST has never been "billed as a 'crystal ball' for predicting child harm," as the author claims. It was developed to give more standardized information to call screening case workers to assist in determining whether a call should be investigated or not. The AFST quickly and systematically distills information already available to the call screener, and in doing so, helps address unwarranted variations in practice that exist at the expense of families.

Second, the author's main premise, that the "model fails poor families" is based on her incorrect assumption that the more public benefits (e.g. SNAP and TANF) a family accesses, the higher the AFST score. In reality, for 45% of families, receipt of the services is protective, that is, their receipt lowers the AFST score. Nationally, the disproportionate involvement in child welfare of those impacted by poverty is well documented. Allegheny County is no exception, but refinements to any part of our child protection system including our investigative screening decision process cannot wait for poverty to be eliminated, as suggested by Ms. Eubanks. The unfortunate societal issue of poverty does not negate our responsibility to improve our decision-making capacity for those children coming to our attention. Ms. Eubanks proposes that we all "join a social movement to solve poverty…". We, of course, look forward to innovative solutions that may help address the underlying conditions so commonly observed in the families we serve. But in the meantime, we will continue to develop concrete solutions to refine and tackle our legal imperatives.

Child welfare agencies are, by law, required to decide whether to investigate an allegation of child abuse. It made eminent sense to DHS to use all the information at the disposal of our agency to help make the right decision with every call. This new tool augments; it does not supplant call screening discretion and decision processes. Indeed, after more than a year of implementation in the field, it is clear our call screening case workers are not blindly following the AFST score. Ms. Eubanks' suggestion that "like Uber human drivers, Allegheny County call screeners may be training the algorithm meant to

replace them" is inaccurate, misleads readers and creates fear by asserting that case workers will lose their jobs to this automation.

Third, Ms. Eubanks is incorrect in her statement "if a family's AFST score is high enough, the system automatically triggers an investigation." An investigation is never automatically triggered by the AFST. In fact, it is Allegheny County policy that children classified by the AFST as being at the very highest risk level should be screened in for investigation unless a supervisor deems this unnecessary. Indeed, more than 30-percent of children classified as at highest risk by the AFST were screened out by supervisors in the year following implementation of the tool.

Finally, the AFST is, by its nature, a call-screening tool applied after a call comes in, at the point where we are required by law to make a decision as to whether or not an investigation will take place. It is not clear how the author believes a "tool concentrated on referral" would work or what it would set out to achieve. In our 2017 publication studying racial disproportionality in Allegheny County, DHS found that the great majority of disproportionality in the county's child welfare services actually arises from referral bias, not screening bias, a finding that is mirrored nationally. Mandated reporters and other members of the community call child abuse and neglect hotlines about black and biracial families three and a half times more often than they call about white families. In response, we redoubled our efforts to address this issue through community education efforts, staff and mandated reporter training, and clients' rights publications and disclosures. And while we know we have more to do to address the intractable problem of referral bias, the AFST is proving itself to address screening bias.

To be clear, efforts to introduce algorithms in the public sector should be scrutinized and openly critiqued. We take no issue with dissenting voices and have welcomed feedback throughout the process. Working with our partners at Auckland University of Technology and the University of Southern California, we have undergone an intense and transparent process to develop, implement and refine the AFST. This process included careful procurement, community meetings, a validation study, independent and rigorous process and impact evaluations and an ethical review, which concluded that not only was use of the AFST ethical but also that not using it might be unethical because of its accuracy. The process and related materials are well documented and available for the public to review at www.alleghenycountyanalytics.us.

We are disappointed that the AFST has been so poorly described and worry that subsequent discussions will be founded on a misunderstanding of its role and reach in decision making. Allegheny County is committed to finding new and innovative ways to help keep children safe and to improve our child welfare system. We stand by the process we are using to develop, implement evaluate and refine the AFST.