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Mandated Reporter Commission
C/O Office of the Child Advocate
One Ashburton Place, 5th Floor
Boston, MA 02108

April 21, 2021

Dear Mandated Reporter Commission,

Thank you for the opportunity to offer feedback on the mandated reporter proposals set forth by the Commission. The Alliance of Massachusetts represents the 28 YMCA Associations, their 86 branches, and 700+ locations in Massachusetts. The YMCAs are the largest collective youth serving organization in Massachusetts, serving over 500,000 youth under age 19 annually. Collectively, the YMCAs are the largest early education providers, the largest out-of-school time provider, and the largest camp provider in the state. The care and protection of children and youth are of the up most importance to our organization.

As such we hope that the feedback provided to you below is helpful.

1. Draft Language proposals related to the definition of mandated reported with analysis: Introduction

- a. We do support the inclusion of some volunteers as mandated reporters. However, we would request that the term "volunteers" be defined here. For example we have many volunteers that never interact with children in their role as volunteer with our organization. A simple definition of which volunteers are now mandated reported and examples i.e. the sports coach but not the parent on the camp field trip for the day, would clarify.
- b. Clergy: We would suggest that you revisit this language to be more inclusive of all faiths beyond church and religious body.
- c. Youth Service Organizations: We agree that other youth service organizations have a role to play as mandated reporters. We recommend further clarification within the proposal that this does include those traditional activities such as karate and dance studios.

2. Central Reporting System:

- a. We fully support a central reporting system, however we would ask that the system be staffed and resourced in a way that it cannot be overwhelmed and children will not slip through the cracks. We would also recommend that prior to implementing a centralized reporting system, that the differing policies for each agency be reviewed and aligned.

3. Mandated Reporter Training:

- a. We support the need for mandated reporters to have one standardized initial training, with continuous trainings over the course of their careers. While we understand the idea of Proposal One and entrusting an entity to develop trainings and make changes as necessary, there is concern around the time, resources needed to stand this up and bureaucracy that could be created. While we do not disagree with Proposal One, we just caution the addition of another agency in this area.
- b. We also seek clarification around who is responsible for paying for the trainings. Would it fall to the organization, especially if the reporter is a volunteer or would it fall to the

reporter? What would the cost be for the trainings? We would request that the cost not be high and cost prohibited if there is a cost to these trainings.

- c. We are concerned that the mandated reporter is required to identify race and ethnicity of the child. We are concerned that this may lead to implicit bias. While we understand the purpose of this data and the need to collect it, we support training on implicit bias for all mandated reporters as well as the proposal to only include this if a reporter knows the race and ethnicity of the child and the offender.

The YMCAs appreciate the time and thoughtfulness that went into these proposals. Our final recommendation is that training will be of the utmost important. The Commission is looking at greatly expanding who is a mandated reporter; this could lead to over reporting and unfortunately an even greater disproportional amount of children of color in the system.

We look forward to working with you as you move forward with your recommendations.

Sincerely,

Kate-Marie Roycroft
Director of Government Affairs & Social Responsibility