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p. 11 section A. Increasing the minimum age to 18. There are older teens employed in camp, afterschool and daycare settings who are in caretakers roles through the provision of services. Why would they be excluded from the filing obligation? The filing through another reporter is not appropriate as the information should be first hand in reporting. Perhaps an internal process to assist or support the employee would be helpful but I believe the obligation should be on the person that receive dthe information first-hand.

p. 11 section B. This designation excludes volunteers from filing obligations. This seems concerning. Coaches, Troop Leaders, Youth Group Leaders, coaches and Religious Education teachers would fall under this category. They have all been places where abuse has occurred and it would be concerning for volunteers to not be reporting.

p. 13 section C. Substance Use Disorder Counselor (not substance abuse counselor)

p. 18 section A. I fully disagree with this proposal. It is confusing to others when a person identifies as a "social worker" yet does not have the filing obligation due to working under the attorney. Psychologists hired in the capacity as experts still have a filing obligation. Your obligation comes from your role and licensure and should not be from the person who hires you. From that logic, I work directly for the judge as a court clinician and judges don't file, should I not? I do in my role and warn people accordingly (social worker by profession). I also have to add that is a trusted adult does not act to keep you safe are they really trustworthy? I think we let kids down when they disclose and we do not help keep them safe.

p. 20 Confidential Services. This is tricky. While I do not want to interfere with a person seeking safety, these are often the same situation where our children are most vulnerable. This is also similar to police response and they do have a filing obligation. I think the key in working with people experiencing domestic violence would be in the transparency and communication around filing. It is also a chance to advocate and explain the situation that they are experiencing. I would not be in favor of removing the filing obligation.

p. 21 section A Exclusion of Attorneys. I struggle with this. I have many times been placed in the situation that I have been brought into a discussion to specifically file on a situation that a client has disclosed to an attorney. I understand the trust of the client but when working specifically with children, I feel that if a child discloses, this information must be reported to keep a child safe. Again, there are work arounds but it is always best to get the information from the initial disclosure. I also have to wonder if an adult who has information with regard to a child's safety does not disclose that information is there truly safety and trust that is conveyed.

p.26 "non-accidental". Perhaps deliberate would be a better choice. I am not sure how one would accidentally sexually abuse a child.

p.27 section C. The underage consensual sex part can get in the way of discussing with teens openly about healthy intimate/sexual relationships and how to keep themselves safe. Many states have moved towards Romeo and Juliet Laws that look more towards the age difference between two people rather than the age of consent. We need to still be mindful of sexual acts which exploit or abuse but in the context of two adolescents having a sexual relationship we may best served by teaching healthy communication and safer sex practices and helping them to learn about having a healthy relationship.

The prosecution piece has also been interesting. The need to file and possibility of prosecution has limited discussions with teens around safe and healthy relationships. My experience has been that there is interest in prosecution of the case when the female is underage but not equally so when the males are underage. There has also been interest when a child is conceived. The case decisions appear sexist and patriarchal. It is a system that seems to perpetuate the underreporting of male victims and over-reporting of females whom society seeks to protect. We need to protect all children equally.

p. 28 Institutional Reporting. It seems clearest if the person getting the initial disclosure does the reporting-the obligation is on them. This does not preclude the use of reporting the information to a superior but eliminates the possibility of the secondary person not filing. The details also being reported to the primary person allows for the clearest reporting of details as they were shared. There are situations where a team may be the recipient of the disclosure and perhaps a single filing with a listing of all parties might be appropriate. My experience has been that often when it is a moving case going from person to person that there may be assumptions about who has filed or not. This muddies the waters and at times, leaves an incident without being properly reported in a timely fashion.

p.32 section B I agree with the concern about implementing the fines in a non-biased manner. I also am concerned with anything that could possibly deter someone from filing due to fears that it would be misconstrued as frivolous.

p.33 Penalty for Willful and Serious Violations. I would like to take this back to social workers hired under defense attorneys. How would this be fair and just if this penalty applied to some but not all social workers who failed to report?

p.34 Licensing Violations. Again I would like to note my concern that social workers working under attorneys would not be subjected to this. It should be based on your profession. It is a professional license. It should not be the result of your role.

p. 40 Mandated training. I would prefer proposal one as it has a designated entity that would be responsible for the training and ideally would be updated to reflect any current changes or practices.

Communication around filing has been poor with regard to changes or even just reminders to people about the obligation and process. This might correct this and ensure that communication around changes or additional filing criteria such as CSEC are communicated in a more timely and efficient manner.

p.41 section A. I respect wanting to be mindful of a volunteer's time but I think an effort to develop a training that is clear and efficient for all would be better. It should not be differentiated. Adults responsible for children should be fully prepared for whenever a disclosure happens. Perhaps a "Part Two" that gets more into the professions would be appropriate but the basic information should be presented in the same manner to all. It emphasizes the seriousness of a disclosure and the importance of adults in all roles having an obligation to children. I say this with experience as both a professional and a volunteer.

p.43 Race and Ethnicity Reporting. I think it is important to capture this data whenever possible to identify patterns and then make plans for remedial action. There must be good data systems in place. If people cannot report accurately they will not. There needs to be room for multiple races, ethnicities and languages. There also should be trainings in cultural humility for screeners and investigators to help them understand and respond/educate to differences based on cultural practices and conditions of poverty or illness. Perhaps we have a screen out option that would allow education or assistance to help support families.

p.44 section A. I think that sharing information directly with the DA or police could get confusing regarding protection or prosecution. If shared with DCF the focus is on prosecution.

p.44 section B. It would seem logical that the 15 day window would be extended to allow for results that take longer to report and are directly relevant to the allegation.