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I am Roxann Mascoll, LCSW and identify as a black social worker with an eighteen-year career at the Department of Children and Families as a Domestic Violence Specialist. I provided leadership to create a departmental brochure titled Promising Approaches: working with families, child welfare and domestic violence. This was an eight-year project that included multi-disciplined effort with our mandated reporter community partners, DCF leadership, and the DCF Domestic Violence Unit.

The purpose of this brochure is to provide a framework for mandated reporters to use family-centered assessments when they encounter intimate partner violence (IPV) and/or domestic violence situations. It is important to make the distinction between how using the terms domestic violence and intimate partner violence are not interchangeable. IPV is determined when one person is using power and control tactics over the other person in an intimate partner relationship. Domestic violence is an overall term used to describe any violence that occurs in a person's home, which may not always include power and control tactics. Power and control tactics are the behaviors and decisions used by one partner towards another to instill fear and use that fear to maintain control over their partner. A common tactic is the use of physical violence.

When the domestic violence terminology is simply used to describe every situation of partner violence it minimizes the dynamics of relationship experience. An inability to use the distinction in definitions hinders the capacity to comprehensively assess. Power and control tactics are often covert in nature but not always. Comprehensive assessment can assist the mandated reporter methods to use critical thinking skills to offer support such as safety plan with families, filing in concert with non-offending parent or decide when it is necessary to avoid filing due to severe danger. Any decisions that are made to address the violence in the relationship can trigger a dangerous situation which includes filing a 51A report. Assessing the tactics is critical however primarily depends on the non-offending parent to make disclosures which increases harm, violence, and/or death.

Intimate partner violence can occur in any relationship regardless of gender, ethnicity, and social-economic class, sexual orientation. Rapport building and non-judgment stance help to gather information about a person's story. Often the main obstacle for a mandated reporter is their own awareness of their bias and cultural perspectives such as homophobia, toxic masculinity, misogyny, patriarchy, to name a few. For example, in same sex or non-binary relationships it can be difficult to determine which partner is the primary aggressor versus the partner resisting the violence in the relationship. There are similar occurrences when there is IPV perpetrated between a cisgender female towards their cisgender male partner. The brochure attempts to provide a best practice approach to offer space to be critical thinking, matched with sound clinical judgment by mandated reporters.

We know from research and direct contact with families that when they are offered support, empathic listening, validation, concrete resources often non-offending parents are able to make safe decisions on behalf of their children. Mandated reporting cannot be deemed as the safest supportive response to every family's experience because we know DCF is not able to safety and effectively help in every situation.

Intimate partner violent situations usually trigger the need for separations to increase safety. When families are separated the non-offending parent usually is rendered severely poor due to the loss of resources from the relationship. The power and control dynamics has impact on the level of social isolation of the partner experiencing victimization. This is not an exhausted list but something to help provide a perspective of the intense sense of loss:

- Homelessness and any basic necessities of home;
- Leaving the home community, which includes services, support networks, school community;
- Loss of any source of income;
- Unable to work or attend school to stay safe
- Difficulty applying for any governmental services
- May need to relocate out of state.

The non-offending parent is basically has to choose to be poor in order to be safe. Therefore changing the neglect definition to obligate a mandated reporter to file because the non-offending parent is unable to provide basic necessities as neglect is increasing unnecessary harm. As regular practice the department will consider the culmination of concerns and sometimes how many 51A reports have been filed can initiate life-alternating decisions by the department. This practice is especially dangerous for black and brown families experiencing violence in their relationships and making changes to the definition of neglect will expose these families causing compounded trauma. In addition, this proposal encourages an automatic filing practice and removing a critical thinking component. Non-offending parents are better serviced when options are available to them such as concrete basic needs and/or making referrals that address their needs. Many non-offending parents end up becoming disabled due to the violence in the relationship. This proposal to ignore a parent's disabilities as a component of experiencing violence and then adding a filing is like stacking the deck against the Commonwealth's most vulnerable families.

The commissions' proposal on changing the parameters of defining neglect is what happens when you don't have experts at the table, black identifying people, and practicing social workers. Finally, removing caretaker language from the definition does not necessary assist in holding offending parents accountable for the impact to children when using power and control tactics. Tactics can also use children as a pawn to control the non-offending parent as well. The Commonwealth has struggled in figuring out how to hold offending parents accountable because funding has only utilized one approach to address the violence in the relationship.

I am not in support to change the definition of neglect. Equating a family's poverty as neglect ignores that systems have been created to ensure there is a class of poor people for capitalist needs. The proposal is unintentionally targeting black, brown, white poor, and disabled parents by suggesting these situations are the source of neglect. The suggestion to remove the caretaker identifying language will have unintended consequences that will create an influx of reports that the department will not be able to manage especially without any critical thinking render the department to investigate situations that are boundless. The caretaker language is necessary component considering that the department's role is to protect children and their caretakers are responsible for them. DCF cannot sort through all these reports and will be overwhelmed with reports that the actual work to protect children will become secondary. The commission may want to have focus groups with departmental front line DCF workers and supervisor staff that is confidential so you can have more information about the impact of these proposals.

Being a paid profession and having an obligation to perform this task offers a check and balance regarding ethical decision-making practice. Professionals have access to consultation and supervision to determine best ethical practices to effectively keep families safe. Obligating members of the Commonwealth as mandated reporters is not necessary when they have always had the option to file a report on behalf of a child and many have made reports. This obligation does not necessarily increase safety for children overall except it is assuming that children are deemed invisible when the most egregious cases have included mandated reporter community members.

In addition, I want to bring to your attention about the importance of maintaining the mandated reporting law as stated. When a mandated reporter takes the time to assess the situation, building rapport, consider safety first (National Association of Social Workers and Association of Social Worker Board value/ethical principle) and use their critical thinking to decide the safest next steps in a IPV situation they are in fact operationalizing 51d (vi) whatever action, if any, was taken to treat, shelter or otherwise assist the child. The brochure has finally helped and guided mandated reporters to participate in a community response manner for the better good. Now mandated reporters are doing what is best for their clients and the community to have the commission decide to take away is disheartening. Social workers are actually living through the expectations of their social work license that is regulated by the Commonwealth. To ignore these factors is to minimize the profession and the commitments the Commonwealth has made to its residents.

The commissions' proposal to extend the reporter list does not include any check or balance. Which may unintentionally cause the minimization of the family's experience and worse encourage "when in doubt, file." Understanding the dynamics involved in mandated reporting due to intimate partner violence relationships can be crafted practice and honestly my experience at DCF has afforded me the opportunity to see and work with departmental staff that struggle with responding to these dynamics. In the proposal it mentions there would be training available however it probably would be a baseline training, which cannot address the complex dynamics in, mandated reporting when

intimate partner violence is the primary concern. Therefore opening the door to many problematic dilemmas when "lay" persons are making reports opening a Pandora's box to target Black and Brown communities which we see occurring in the prison industry complex and pipeline to prison in the American schools.

I want to offer a recent example of a family that I have been working for that includes child protection open case, juvenile court system, indigent legal and social work services. The primary issue is the impact of intimate partner violence by the offending parent towards the non-offending parent and exposure to the children resulting in complex trauma and disrupted/insecure attachment patterns. There are indicators that both parents equally have been exposed to complex trauma as children that have been unacknowledged or invalidated impacting their parenting. The offending parents' rights have been terminated and have moved away from the family. The non-offending parent has completed all requirements with measurable observable changes in behavior. The child protection system representative has boldly expressed that it is their opinion that they cannot trust that the non-offending parent can sustain the changes achieved and are observable. These are the standards upheld by the Department and the Commonwealth. In my mind I have to wonder what is going to happen with this proposal to extend the mandated reporter community when we all know there is no amount of training that is going to ensure that families are not being re-victimized by an individual's personal worldview perspectives and make decisions from that point when child protection staff are not being held accountable for their privilege to admit these opinions where is the justice in these ideals and how can the system hold the burden for these opinions and plan from that angle. These are some of the dynamics that cause more harm to children of color and their families.

Please find enclosed the link to the referred brochure: <https://www.mass.gov/files/documents/2016/07/pm/promising-approaches-publication.pdf>