



Dear Mandated Reporter Commission Members,

I am submitting this testimony after listening to the testimony offered at the Commission hearings on April 13 and 17. It was impressive in that all but one person testified against the Commission's proposal and a number of brave family members with DCF experience brought the 51A process and its impact to life. Additionally, I found the testimony of Dorothy Roberts, Benjamin Levy, Zoe Russell, and Mical Raz to be quite compelling.

I am the Policy Director for [Friends of Children](#), a child advocacy organization providing direct services for children and young adults impacted by the child welfare system in western MA and conducting policy/advocacy work statewide.

I want to take this opportunity to focus on the following concerns.

First, I ask if the Commission is operating above and beyond what the Legislature has mandated in indicating a need for a comprehensive review of the Commonwealth's child maltreatment reporting structure in the report. The House Committee on Post Audit and Oversight made two recommendations in response to the USA Gymnastics national sexual abuse revelation: to enact legislation to require coaches, administrators and other staff employed by or volunteering with private athletic organizations to act as mandated reporters, and to implement a standardized online mandated reporter training. The Act Relative to Children's Health and Wellness 2019 established the Commission and requested the Commission review and report on existing laws and regulations and make recommendations to improve the response to, and prevention of, child abuse and neglect. Neither refer to a comprehensive review or overhaul.

Second, the Commission Report does not address or answer the following questions that seem basic to this process, especially if the Commission is conducting a comprehensive review:

1. What is the problem the Commission is solving with this expansion? How do the recommendations improve the response to, and prevention of, child abuse and neglect?
2. We are often told, by DCF and others, that the Commonwealth has one of the most expansive child protection nets in the country. What, then, is driving a recommendation to broaden this net? Has the Commission examined an approach that tightens the structure around reporting and expands support and services?

3. The report indicates the Commission considered universal mandated reporting and chose not to recommend that approach because there was no proof of effectiveness. What is the proof of effectiveness of the proposed approach? What research was reviewed and what experts were consulted? What other states have implemented this type of expansion and what was their experience? Do your recommendations reflect best practice? At least one of the persons who testified was asked by a Commission member to provide an example of a state that is doing mandated reporting well. I must say that request is surprising as I would expect the Commission to have sought that information prior to preparing this report and recommendations (if you did, it is not in the report).
4. The proposed changes will most certainly increase reports to DCF; however, there is no reference to budget or staffing requirements to handle the additional reports and assessments. What is the financial impact and is that the most effective way to spend taxpayer dollars? Could we not be spending more on the front-end focused on prevention, services and support?
5. An expansion in mandated reporting will involve more families who need services and not child protection. There is no mention in the report of expansion of services or implementation of a process to ensure poverty and other support and service needs are addressed.
6. The report does not include a recommended training program or specifics regarding the training; it references only the frequency and topics. Implementation of a standardized online training was a direct request of the Legislature.
7. Has the Commission considered separating child protection responsibilities from child/family support and services (not housing both within DCF)?
8. Has the Commission considered education/training for all of the categories of mandated reporters (current and proposed expansion), as to how they might help families in need, vs. filing a report to involve another family in the system?
9. Has the Commission considered a blinded 51A intake and assessment process to begin to address the disproportionality issue?

In light of the oral testimony, and the concerns I describe above, I implore the Commission to revisit and reimagine the report and recommendations, regardless of the additional time required. This is a responsibility with major implications for the Commonwealth's citizens. This is an opportunity for the Commission to lead and to address the best interest of all children and families of the Commonwealth.

I request that the Commission's consideration of these concerns and questions be included in the publicly available final report.

Thank you for the opportunity to submit this testimony.

June D. Ameen  
Policy Director  
Friends of Children, Inc.  
[Junedameen13@gmail.com](mailto:Junedameen13@gmail.com)  
617.872.5988