

PRAESIDIUM INTERIM REVIEW

MCPS PROTOCOLS FOR REPORTING AND INVESTIGATING Child Abuse and Neglect Cases

April 20, 2015

INDEMNITY STATEMENT

Praesidium, Inc. provides this review to assist in the prevention of organizational abuse. However, it must be noted that no system can guarantee prevention of abuse.

When all recommendations are implemented and maintained, a risk for abuse continues to exist, as the problem of abuse is pervasive and no system to date can assure complete safety.

**Praesidium Interim Review:
MCPS Protocols for Reporting and Investigating
Child Abuse and Neglect Cases and
Draft revisions to Montgomery County Board of Education Policy JHC,
Child Abuse and Neglect (dated April 15, 2015)**

Background and General Comments

By way of background, Praesidium has worked with several thousand youth serving organizations, including public school districts and independent and church affiliated schools, for more than two decades in the United States and 11 other countries. We are the national safety partner with the YMCA of the USA, Boys & Girls Clubs of America, the Conference of Major Superiors of Men serving the Catholic community nationwide, the Church Pension Group serving the Episcopal Community nationwide, the USA Olympics-Swimming, and the Salvation Army in the United States, Canada, Bermuda and Ireland. In addition to developing model policies, we offer a comprehensive array of abuse prevention products and services.

Praesidium has reviewed numerous iterations of the documents referenced above and provided several rounds of feedback, all of which has been addressed by MCPS personnel and agency and community representatives. The findings and recommendations included in this document are interim in that we expect to review additional documents, such as a Code of Conduct, and further iterations of the documents already reviewed after additional input from the community.

We believe the two documents reviewed articulate a well-conceived and thoughtful approach to the two tasks at hand: reporting and investigating child abuse and neglect cases. The proposed guidelines developed through collaboration between MCPS, community agencies involved in the protection of children, and parents and other stakeholders meet, and in many cases exceed, what we have seen in other schools and youth serving organizations across the country.

Below we provide brief comments on particularly noteworthy items included in the protocols and we conclude with some additional recommendations.

Section 1. Definitions

I. C. County Multi-Disciplinary Team (MDT). We were impressed by the level of cooperation and coordination demonstrated by the formation of the County Multi-Disciplinary Team (MDT). This should help to remove a common barrier we often see: lack of coordination between community organizations, all with the same intent but with inadequate procedures to facilitate the best outcomes for all interested parties.

I. D. MCPS Child Abuse Coordinating Team. Similarly, but with the aim of coordinating efforts *within* MCPS, the Coordinating Team should ensure that multiple interested parties have access to information and are involved in the response to reported instances of child abuse and neglect.

I. M. School-Based Child Abuse Liaisons. We were especially impressed with this concept and in fact we launched a similar model in the YUSA nationwide and in a number of national youth serving organizations. Building an internal network of specially trained professionals helps to ensure educated and coordinated decision making.

Section 2. Reporting Responsibilities for MCPS Employees, Contractors, and Volunteers

This section describes clear requirements for who must report what and to whom and the chain of events triggered by a report. We were impressed, again, by the level of cooperation among interested community stakeholders.

There was evidently some thinking that the police, *in addition to CPS*, should be notified about every report. This is a common quandary across the country since there are often no clear applicable federal or state regulations or the decision is left to a local community or even to a local agency. Requiring that both be routinely notified would be unnecessarily duplicative and likely lead to increased confusion and noncompliance. The best way to address this issue is exactly the process MCPS has taken: collaboration among the interested parties. The system proposed by MCPS gets the job done. We think the process should be articulated in a flowchart and included in training for everyone.

We also commend MCPS for including not only employees but also contractors and volunteers as subject to the guidelines. Contractors and volunteers often have access to children and therefore can present a risk. Also if properly trained, they may see situations or interactions of concern and may serve as another set of eyes to contribute to a safe environment.

VII. Professional Development

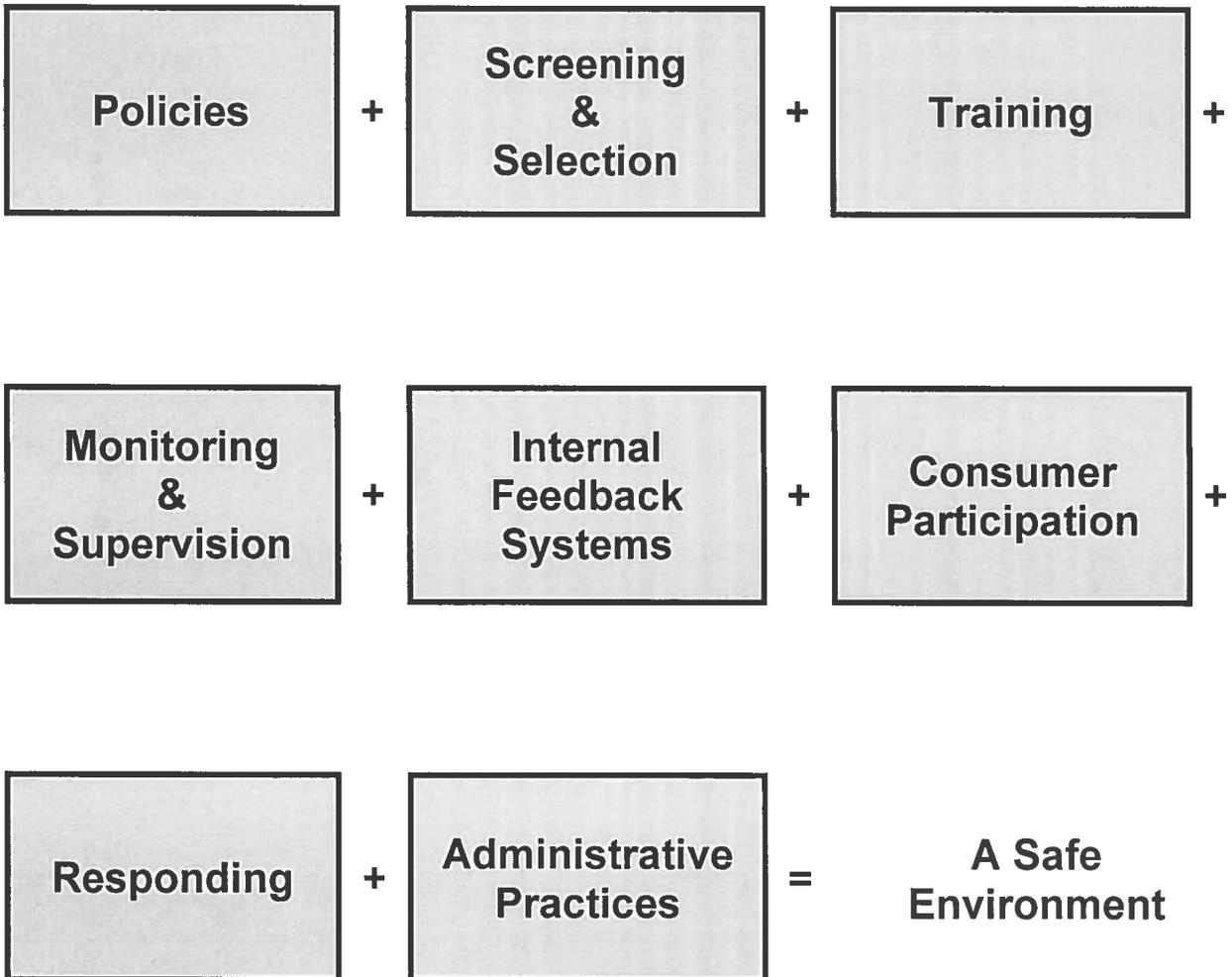
The information included in this section is useful. However it appears to mandate that MCPS provide abuse prevention training to the community. We recommend that MCPS first concentrate on providing training and information to parents and guardians of MCPS children and that the training focus on district policies and support relevant to abuse prevention. For example, the training should teach parents exactly what to do if they discover or suspect a violation of school policies. For example, how should parents respond if they find hundreds of text messages to their child from a teacher or a principal or a coach?

We also recommend that, rather than specifying how or when training be delivered (e.g., online, at the start of the new year), the district first identify the target audience(s) and the appropriate training objectives, then develop a training plan and system to allow for the correct content to be delivered to the correct audience(s) in the best way(s) at the best time(s) and that training compliance be carefully tracked.

Going Forward

The documents developed by MCPS and collaborators represent no small accomplishment towards keeping children in school safe. However, both of the tasks addressed here primarily involve responding to an alleged incident and perhaps to a child victim. Praesidium's proprietary risk management model, Praesidium's Safety Equation, takes a comprehensive approach aimed at preventing incidents of abuse in the first place through clear policies, comprehensive screening and selection, abuse prevention training, monitoring and supervision, comprehensive screening and selection, abuse prevention training, monitoring and supervision and the other organizational operations shown below.

THE PRAESIDIUM SAFETY EQUATION™



Summary

In summary, this is an impressive document that demonstrates the benefits of collaboration between dedicated individuals who care deeply about the safety of children. We believe that when implemented the proposed standards will provide comfort to parents and educators that the district is a leader in the protection of the children in its care.

We are grateful for the opportunity to be of assistance to you.

Sincerely,



Richard F. Dangel, Ph.D.
President and CEO



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