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March 4, 2025

Delegate Ben Barnes, Chair
House Appropriations Committee
Room 121, House Office Building
Annapolis, MD 21401

Dear Chair Barnes and Members of the Committee

Subject: **House Bill 1480 - Child Advocacy Centers - Continuity of Care Standards for Health Care Professionals and Reports of Violations**

Position: **SUPPORT**

The Maryland Psychological Association, (MPA), which represents over 1,000 doctoral-level psychologists throughout the state, asks for a FAVORABLE report on House Bill 1480.

House Bill 1480 as drafted requires that Child Advocacy Centers (CACs) from across the State institute the following best practices to protect the children receiving services from any lapse in care.

The Bill requires:

- an individual providing medical or mental health services in a child advocacy center to be licensed or certified and provide services within the scope of the license or certification;
- each child advocacy center to establish a continuity of care plan; and
- each child advocacy center to report complaints to the Department of Human Services for investigation and further action.

The continuity of care plans specifically would:

- Require notification of children and parents or guardians if there is turnover of their health care providers,
- Allow the departing health care providers, the opportunity to have a final session with the client/family to allow for closure and appropriate transition to the services needed to resolve their mental health challenges, and
- Create a contingency notification process if notification to the parent or guardian, or contact by the provider would endanger the child.

The MPA strongly supports House Bill 1480 as it serves to protect the most vulnerable children in our state, and the mental health professionals providing care to them.

Child Advocacy Centers (CACs) are an essential part of the care spectrum for children who are victims of abuse. CACs operate on limited budgets and despite that excel at what they do. However, like all organizations they are fallible and need oversight beyond which they can provide themselves.

The impetus for this bill arose from a CAC deciding that their therapists were no longer being cooperative with staff and terminated the therapist's employment. As the law currently stands the organization is under no obligation to the children being served. The organization can fire the therapists and not allow the therapists to have a termination session where treatment planning can take place to address the needs of this particularly vulnerable population.



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There is currently no State entity that these children or therapists can make a complaint to, no specific State agency tasked with investigation of such events and no review of the data of even how often this may happen. There are also no specific penalties associated with any failures that may occur.

House Bill 1480 serves to provide some oversight of Child Advocacy Centers by the State of Maryland, places that receive yearly State funds and provide much needed protection to the State's vulnerable children as well as the mental health providers who help them.

During the Interim, the Chair of the House Health and Government Operations Committee submitted a request that the Governor's Office of Crime Prevention and Policy work with the Maryland Children's Alliance, and the Department of Human Services to gather information from each of the Child Advocacy Center's in the State specifically on continuity of care plans that are in place, and any complaints received. Attached is the Chair's request letter, the Response from the agencies, and a summary of the documents submitted by the CACs. What was revealed is that only a few CACs have any specific documented continuity of care policy or language. This demonstrates the need for established continuity of care plans for all.

Thank you for considering our comments on House Bill 1480.

If we can be of any further assistance as the Committee considers this bill, please do not hesitate to contact MPA's Legislative Chair, Dr. Stephanie Wolf at mpalegislativcommittee@gmail.com.

Respectfully submitted,

David Goode-Cross, Ph.D.
David Goode-Cross, Ph.D.
President

Stephanie Wolf, JD, Ph.D.
Stephanie Wolf, JD, Ph.D.
Chair, MPA Legislative Committee

cc: Richard Bloch, Esq., Counsel for Maryland Psychological Association
Barbara Brocato & Dan Shattuck, MPA Government Affairs

JOSELINE A. PEÑA-MELNYK

Legislative District 21
Prince George's and
Anne Arundel Counties

Chair

Health and Government
Operations Committee

Rules and Executive
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Legislative Policy Committee



The Maryland House of Delegates

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April 2, 2024

Rafael Lopez
Secretary, Department of Human Services
311 West Saratoga St.,
Baltimore, MD 21201

Dorothy Lennig, Executive Director
Governor's Office of Crime Prevention & Policy
100 Community Place
Crownsville, MD 21032

RE: House Bill 1100 - Health - Child Advocacy Centers - Reporting Requirements and Investigations

Dear Secretary Lopez and Director Lennig:

The Health and Government Operations Committee is interested in following up on issues raised during the hearing on House Bill 1100 - Health - Child Advocacy Centers - Reporting Requirements and Investigations.

The Committee recognizes the important and critical role Child Advocacy Centers (CACs) play in protecting and supporting children who are victims of neglect and abuse.

To further discussions on the level of and adequacy of oversight under which CACs operate, the Committee respectfully asks that Governor's Office (GO CPP), in conjunction with the assistance of the Department of Human Services (DHS), request and collect the following from the National Children's Alliance, the Maryland Children's Alliance and each of the CACs that operate in each jurisdiction of the state:

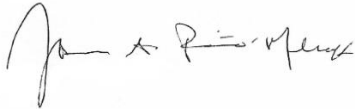
1. Formal complaints that have been raised against Maryland CACs or their contracted providers and the disposition of those complaints over the last 5 years as they relate to the mental and behavioral health services provided by or through the CAC.
2. Operating procedures and/or policies which guide each individual CAC or their contractors specifically as it relates to continuity of care provisions establishing a course of action to be taken with respect to transitions (termination of treatment or transfers) between mental and behavioral health providers and children under the care and jurisdiction of CACs or their subcontractors. These policies are separate and apart from the obligations of the respective health occupation boards that govern their licensee's behavior. This is specifically seeking documents governing the interaction between the CACs or their subcontractors and the licensed professionals with respect to services provided to children referred to or through the CAC.

The committee also asks that GOCPP and DHS, in consultation with **the Department of Human Services**, to review, identify and report on the existing mechanisms for complaint, resolution, and tracking systems for vulnerable persons in the state (for example: the elderly, disabled, foster care).

There is compelling interest for the State of Maryland to ensure that the CACs continue to provide for the children they serve in a transparent way. GOCPP and DHS, through its collection of this information and review of potential annual reporting requirements and complaint resolution mechanisms, will help inform the Committee on next steps with respect to the need for additional State legislation and oversight.

We ask that a response be provided to the House Health and Government Operations Committee by September 16, 2024.

Respectfully,

A handwritten signature in black ink, appearing to read "Joseline A. Peña-Melnyk". The signature is fluid and cursive, with the first name being the most prominent.

Joseline A. Peña-Melnyk

cc. Senator Anthony Muse
Delegate Jon Cardin
Delegate Bagnall, Subcommittee Chair, Public Health and Minority Health Disparities
Erin Hopwood, Committee Counsel

September 16, 2024

The Honorable Joseline A. Peña-Melnyk
Chair, Health and Government Operations
Committee
6 Bladen Street, Room 241
Annapolis, MD 21401

RE: Response to Issues Raised During the House Bill 1100 Hearing

Dear Chair Peña-Melnyk:

Please find an enclosed copy of the joint response of the Governor's Office of Crime Prevention and Policy (GOCPP), the Department of Human Services (DHS), and the Maryland Children's Alliance (MCA) to your request for information about Child Advocacy Centers (CACs). This response includes information collected from the National Children's Alliance, the MCA, and the CACs that operate in each jurisdiction of the State.

In response to the issues raised during the hearing on House Bill 1100 - Health - Child Advocacy Centers - Reporting Requirements and Investigations, the House Committee on Health and Government Operations asked that GOCPP, in conjunction with DHS, collect the following:

1. Formal complaints raised against Maryland CACs or their contracted providers over the last five years related to the mental and behavioral health services provided by or through the CAC and the disposition of those complaints.
2. Operating procedures and/or policies that guide each CAC or their contractors specifically as it relates to continuity of care provisions establishing a course of action to be taken concerning transitions (termination of treatment or transfers) between mental and behavioral health providers and children under the care and jurisdiction of CACs or their subcontractors.
3. Existing mechanisms for complaint, resolution, and tracking systems for vulnerable persons in the state (for example, the elderly, disabled, foster care).

All Maryland CACs provided information about formal complaints over the past five years. MCA recorded responses from 24 CACs via email communication in April 2024. The following formal complaints were reported:

1. 2020: Montgomery County CAC reported complaints from terminated employees. As a result of these complaints, three separate independent investigations were instigated by Montgomery County, the Maryland Office of Inspector General, and the Maryland Department of Labor. All three investigations exonerated the CAC of any wrongdoing. MCA and the National Children's Alliance also completed a Critical Incident Report and communicated with CAC leadership throughout the process.
2. 2024: Carroll County reported a verbal informal complaint from a client regarding a possible confidentiality breach by the mental health agency. Although this did not result in a formal complaint, Carroll County CAC has implemented several new procedures to

protect against potential future information breaches.

This email includes all policies, procedures, and formal memorandums of understanding (MOUs) regarding treatment and continuity of care for each CAC as an attachment.

DHS operates a 24/7 Abuse and Neglect Hotline to report suspected neglect or abuse of vulnerable children and adults. The number is 1-800-91PREVENT (1-800-917-7383). All calls to the Hotline are tracked within the official system of record - the Child Juvenile Adult Management System (CJAMS).

Additionally, MCA's website serves as a resource for reporting complaints and/or comments. To access the website, please visit www.marylandchildrensalliance.org. Furthermore, to view reports regarding CACs, please visit GOCPP's website at <https://goccp.maryland.gov/reports-and-publications/>.

Sincerely,



Dorothy J. Lennig, Esq.
Executive Director,
Governor's of Crime
Prevention and Policy



Rafael J. López
Secretary, Department of
Human Services



Wendy Myers
Executive Director,
Maryland Children's
Alliance

**cc: President Bill Ferguson
Speaker Adrienne A. Jones
Special Secretary Carmel Martin
Secretary Rafael Lopez
Senator Anthony Muse
Delegate Jon Cardin
Delegate Bagnall, Subcommittee Chair, Public Health and Minority Health
Disparities
Erin Hopwood, Committee Counsel
Sarah Albert, Department of Legislative Services (5 copies)**

BROCATO & SHATTUCK CONSULTING

CAC Information Included in Appendix to September 16, 2024 Letter “Child Advocacy Center Continuity of Care and Mental Health Agreements”

	CHILD ADVOCACY CENTER NAME AND/OR AFFILIATED ENTITIES AND AGENCIES	NATIONAL CHILDREN’S ALLIANCE ACCREDITED (YES/NO)	DOCUMENTS PROVIDED IN THE APPENDIX (PAGE NUMBERS)	SPECIFIC MENTION OF CONTINUITY OF CARE OR SIMILARLY RELATED POLICIES
1.	Allegany County - Jane’s Place, Inc. and Shelly Warnick (Therapist)	YES	MOU between Janes Place and Shelly Warnick [DATED June 2022] (pgs. 3-5)	No mention of any continuity of care provisions.
2a.	Anne Arundel County Department of Social Services CAC and Better Tomorrow Starts Today (BTST)		Professional Services Agreement between CAC and BTST [DATED: March 2024] (pgs. 6-9)	Yes, Item 17 on page 9: “17. This Agreement may be terminated upon 60 days written notice by either party or at any time upon mutual agreement of the parties. During the 60-day termination period and to the extent practicable, both parties will discuss and agree upon a plan to ensure a smooth transition for clients currently in treatment, including proper termination of the client/therapist relationship.”
2b.	Anne Arundel County Department of Social Services CAC and Arundel Lodge		Professional Services Agreement between CAC and Arundel Lodge [DATED: March 2024] (pgs. 10-12)	Yes, Item 18 on page 12: 18. This Agreement may be terminated upon 60 days written notice by either party or at any time upon mutual agreement of the parties. During the 60-day termination period and to the extent practicable, both parties will discuss and agree upon a plan to ensure a smooth transition for clients currently in treatment, including proper termination of the client/therapist relationship.”
3.	Baltimore City (Baltimore Child Abuse Center)	YES	TEMPLATE Linkage Agreement for Mental Health Referral, Evaluation and Treatment (pgs. 13-14)	No mention of any continuity of care provisions.

	CHILD ADVOCACY CENTER NAME AND/OR AFFILIATED ENTITIES AND AGENCIES	NATIONAL CHILDREN'S ALLIANCE ACCREDITED (YES/NO)	DOCUMENTS PROVIDED IN THE APPENDIX (PAGE NUMBERS)	SPECIFIC MENTION OF CONTINUITY OF CARE OR SIMILARLY RELATED POLICIES
4a.	Baltimore County CAC and The Care Clinic at University of Maryland	YES	Interagency Linkage Agreement for Mental Health Referral, Evaluation, and Treatment [BaltCo HHS, Police, State's Attorney] [DATED August 2020 (pgs. 15-16)]	No mention of any continuity of care provisions.
4b.	Baltimore County CAC and Thrive Behavioral Health, LLC	YES	Interagency Linkage Agreement for Mental Health Referral, Evaluation, and Treatment [BaltCo HHS, Police, State's Attorney] [DATED September 2020 (pgs. 17-18)]	No mention of any continuity of care provisions.
5.	Calvert County Comprised of: Calvert Co DSS, CC Sheriff's Office, MD State Police, CC State's Attorney, MSDE Office of Child Care -Region 10, CC Public Schools, CC Health Dept.		MOU – Joint Investigation of Child Abuse and Neglect [DATED November 2023] (pgs. 19-30)	No mention of any continuity of care provisions.
6.	Caroline County CAC and Caroline County Behavioral Health		Linkage Agreement for Mental Health Referral, Assessment and Treatment [DATED: July 2023] (pgs. 31-32)	No mention of any continuity of care provisions.
7.	Carroll County Advocacy and Investigation Center (CCAIC) and Springboard Community Services (SCS) of Central Maryland (Carroll County)		MOU [DATED: March 2021] (pgs. 3337)	No mention of any continuity of care provisions.
7.1	SCS Job Description		Job Description for a Clinical Therapist (pgs. 38-40)	No mention of any continuity of care provisions.
8.	Cecil County Child Advocacy Center	YES	Policy and Procedure Manual (pgs. 41-67)	No mention of any continuity of care provisions.

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9.	Charles County Comprised of: Charles Co DSS, Sheriff's Office, LaPlata Town Police, MD State Police, State's Attorney, MSDE OCC – Region 10, Charles Co. Public Schools, Charles Co. Dept. Health		MOU – Policies and Protocols for investigation and prosecution of child abuse and neglect (pgs. 68-78)	No mention of any continuity of care provisions.
10.	Dorchester County Comprised of DorCo DSS, Sheriffs Office, MD State Police, Cambridge Police, Hurlock Police, State's Attorney, Dorchester CAC, MSDE OCC region 8, Dorchester Co. Public Schools, Dor. Co. Health Dept		MOU – Policies and Protocols for investigation and prosecution of child abuse and neglect [DATED: April 2023] (pgs. 79 -94)	No mention of any continuity of care provisions.
11.	Frederick County		Contract Services Agreement for Trauma Focused Counseling <i>[Contractor's Name Redacted]</i> (pgs. 94-115)	No mention of any continuity of care provisions.
12.	Garrett County Child Advocacy Center		Mental Health Linkage Agreement between GC DSS and GC Health Dept. [DATED: April 2021] (pgs.116)	No mention of any continuity of care provisions.
13.	Harford County CAC and Springboard Community Services: Outpatient Mental Health Clinic		MOU 2021 [DATED: April 2021] (pgs. 117-120)	Imprecise reference, see E.ii on page 119: "Reasonable time shall be permitted for the CAC personnel provided by the terminating agency to complete pending investigations, prosecutions or interventions."
14.	Howard County CAC and The Listening Place	YES	MOU with The Listening Place [DATED: January 2021] (pgs. 121-130)	No mention of any continuity of care provisions.

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15.	Kent County Child Advocacy Center Comprised of: KC DSS, Sheriff's Office, Chestertown and Rock Hall Police, Maryland State Police, MSDE OCC Region 8, KCPS and KCHD		MOU [DATED April 2023] (pgs. 131-143)	No mention of any continuity of care provisions.
16.	Montgomery County and The Tree House Child Assessment Center Comprised of: MoCo HHS, Dept. of Police, MoCo County Attorney and MoCo State's Attorney		MOU – Montgomery County Child Maltreatment Multidisciplinary Team [sic] [DATED: June 2023] (pgs.144-151)	No mention of any continuity of care provisions.
16.1	The Tree House "CAC of Montgomery County, MD"		Mental Health Handbook (pgs. 150-176)	Prohibits contact post-employment Pg. 167, top paragraph: "If the therapist's employment or practicum ends, the therapist will maintain the confidentiality, integrity, and availability of all confidential information and will not have any interaction via social media, texting or other means with any former clients or their families."
17.	Prince George's County Child Advocacy Center (PGC-CAC) Comprised of: PGC Hospital Center-Sexual Assault Center, Children's National Medical Center, Maryland Family Resources, BTST Services, Affiliated Sante Group-Crisis response, and Community Advocate for Family & Youth		TEMPLATE MOU for Multidisciplinary Team (pgs. 177-191)	No mention of any continuity of care provisions.

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18.	Queen Anne's County The CARE Center and For All Seasons		Partner Agreement: QA County The CARE Center and For All Seasons [DATED: August 2021] (pgs. 192-193)	No mention of any continuity of care provisions.
19.	Wicomico, Somerset, Worcester Counties - Life Crisis Center, Inc.		Continuity of Care Policy (pgs. 194-195)	Pg. 194, Introduction: "We recognize the importance of continuity of care in ensuring the well-being of our clients, especially during times when their primary therapist is unavailable due to illness, emergency, leave of absence, or any other unforeseen circumstances. This policy outlines our procedures to maintain continuity of care and uphold the highest standards of service delivery."
20.	Somerset County Child Advocacy Center		Multidisciplinary MOU [DATED: March 2023] (pgs. 196-211)	Life Crisis Center is the CAC arm of the multidisciplinary team, and utilizes the policy above
21.	St. Mary's County Child Advocacy Center and Serenity Place, LLC		<i>DRAFT</i> Linkage Agreement with Serenity Place, LLC For Mental Health Referral, Evaluation and Treatment (pgs. 212-214)	No mention of any continuity of care provisions.
22.	Talbot County Children's Advocacy Center (TC CAC)		SCOPE OF WORK - October 1, 2023 – September 30, 2024 - TALBOT COUNTY CHILDREN'S ADVOCACY CENTER - Mental Health Professional (pgs. 215)	No mention of any continuity of care provisions.

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22.1	TC CAC and Rebecca Hutchinson, LCSW-C		Linkage Agreement for Mental Health Referral, Evaluation and Treatment between TCCAC and Rebecca Hutchinson, LCSW-C (pgs. 217-218)	No mention of any continuity of care provisions.
23.	Washington County Department of Social Services Safe Place Child Advocacy Center		Washington County Department of Social Services - Safe Place Child Advocacy Center Mental Health Services - Standard Operating Procedure [DATED: Updated October 2020] (pgs. 219-225)	No mention of any continuity of care provisions.
24.	Wicomico County Child Advocacy Center Comprised of: Wicomico County Department of Social Services ("DSS"), Wicomico County Sheriff's Office, Salisbury Police Department, Office of the State's Attorney for Wicomico County, Life Crisis Center , TidalHealth Peninsula Regional	Working towards accreditation	<i>DRAFT</i> MOU – Policies and Protocols for the Investigation and Prosecution of Reported Cases of Suspected Child Abuse through the use of a Multi-Disciplinary Team (pgs. 226-245)	Page 233 – Details Life Crisis Center's role, note their continuity of care policy cited in chart above.
25.	Worcester County Child Advocacy Center Comprised of: WorCo DSS, WorCo CAC, WC Sheriff's Office, Berlin PD, OC PD, Snow Hill PD, Pocomoke City PD, OP PD, MD State Police, WorCo State's Attorney, Atlantic General Hospital, and Life Crisis Center		MOU to provide coordinated response to allegations of child sexual abuse occurring in Worcester County (pgs. 246-269) [DATED: February 2024]	Pages 252-253 - Details Life Crisis Center's role, note their continuity of care policy cited in chart above.