On March 17, the Commission to Eliminate Child Abuse and Neglect Fatalities (CECANF) released its final report, “Within Our Reach: A National Strategy to Eliminate Child Abuse and Neglect Fatalities.” Congress passed the Protect Our Kids Act of 2012, establishing the Commission to develop a national strategy and recommendations for reducing fatalities resulting from child abuse and neglect [P.L. 112-275]. The report detailing their findings and recommendations was transmitted to Congress and the President after two years of deliberations.

The comprehensive report calls for new and stronger laws, greater coordinated action and collective responsibility, measurement across agencies, states and within communities, and further investment, oversight, and enforcement across all levels of government. Some of the recommendations put forth by Prevent Child Abuse America are included in the final report and the recognition the report gives to our contributions is greatly appreciated.

One of the reoccurring themes of the report was the emphasis on early childhood home visiting as a key approach to reducing maltreatment fatalities. We agree with this and many of the Commission’s recommendations but urge the discussion to go further; we owe it to the children, and our future, to outline a specific course of action with an emphasis on a sense of urgency. There needs to be a new direction in how we currently invest in healthy child development and well-being. The Commission highlights “these approaches are promising, but the Commission found no state or local response that included all the elements we believe are necessary to achieve widespread, lasting results when it comes to preventing child fatalities.” However, the nation has no collective framework to achieve this goal and states are already struggling to comply with dozens of requirements, often with little guidance and flat line funding.

After a long national history of following old patterns, there needs to be a shift in how the country prioritizes our children in policies and budgets. An increase in preventive services funding with a focus on prioritization of primary prevention strategies and a collective recognition that the healthy development of children is the shared responsibility of other societal institutions such as corporations, faith based communities and local service organizations must replace the current concentrated focus on “late-end, crisis-oriented, intrusive, and expensive interventions.”

Specific recommendations regarding data-sharing, cross-notification for allegations, research and new reviews, focus only on standardization and elimination of fatalities but can also help to identify and improve prevention strategies. Research confirms strategies that start at birth and even earlier to prevent or counter adverse childhood experiences and promote safe, stable, nurturing relationships and environments can make a bigger impact than responding after trauma occurs.

We believe in the Commission’s work and recognize that there are a wide variety of recommendations that can and hopefully will move the field forward toward a better future for our nation’s children. We agree with the Commission that a public health approach that promotes the healthy development and wellbeing of children, tackles complex social problems and supports community change is the right course of action. Prevention of child abuse and neglect should be a national priority and we hope Congress and the Administration acts urgently to prioritize the following recommendations in the report:

- Increase access to evidence-based home visiting programs and allow states more flexibility toward investing in evidence-based strategies. Including supporting flexible funding in existing entitlement programs to provide critical services in mental health, substance abuse, and early infant home visiting services to support identification and mitigation of risk within families.
• Establish a multiyear innovation program to finance the development and evaluation of promising multidisciplinary prevention initiatives to reduce child abuse and neglect fatalities. The innovation fund would provide states with resources to design, implement, and evaluate prevention initiatives at the state or regional level.

• Increase multidisciplinary support for families by proactively reducing familial and community stressors, through a continuum from prevention to intervention and across multiple systems to improve identification of children and families at the earliest signs of risk. Including cross sector engagement at the parent, family, neighborhood, and system levels. All the systems that interact with families must serve as touch points for proactive prevention and targeted support.

• All have a role to play to ensure that help is available when families need it through services and supports such as prenatal care, mental health services, evidence-based home visiting programs, employment, education, parent partnerships, housing support, early childhood education, and parent skills training, as well as substance abuse, mental health, and domestic violence programs.

• There is little federal oversight and enforcement of the Child Abuse Prevention and Treatment Act (CAPTA) implementation. The federal government does not provide needed guidance on implementing its requirements, nor does it adequately monitor or enforce the required provisions. This lack of attention to the issue in policy guidance hinders the ability of state officials and communities to develop or implement prevention practices.

• Hold joint congressional hearings on child safety in committees that oversee CAPTA, title IV-E, title IV-B, and Medicaid to better align national policies, resources, and goals pertaining to the prevention of and response to safety issues for abused or neglected children.

• Screening for maternal depression during pediatric visits is a strategy to link parents with mental health treatment. Research found targeted screening and intervention for parents experiencing toxic stress and depression can greatly improve parental caregiving capacity. Enable reimbursement for mental health and substance abuse services for a parent under a child’s EPSDT if those services are deemed necessary for the safety and healthy development of the child.

• Prioritize funding research to better understand and identify methods to reduce fatalities due to abusive head trauma or shaken baby syndrome. Based on research findings, we encourage the development and dissemination of an effective prevention effort that is simple, scalable and inexpensive to reduce abuse head trauma. These interventions should target parent skill-building at the time of pregnancy or early childhood, either in the hospital or at home and education on crying babies and safe sleep should become a routine part of education efforts with parents.

• Increase federal leadership through research and policy to guide states on how to shape their mandatory reporter laws and efficacy of training programs. Research studies indicate that professionals who are mandatory reporters have varying levels of knowledge about reporting. Federal legislation should include a “minimum standard” designating which professionals should be mandatory reporters, and training should be an allowable expense under title IV-E.

• Ensure that HRSA and CDC expand the rollout of evidence-based screening tools for Adverse Childhood Experiences (ACEs) and parental risk. The tools should be nonproprietary to ensure
expanded access. Screenings must be supported with access to effective, high-quality treatment services to address the identified needs of both parent and child.

- Capitalize on state and payer investment in primary care medical homes and health homes to increase access to trauma-informed programs (for both parents and children), home visiting services, and other family-based social services within primary care settings.

- Elevate the Children’s Bureau to report directly to the Secretary of HHS. Increase the authority of the Children’s Bureau to meaningfully coordinate efforts across federal programs. The Children’s Bureau has primary responsibility for overseeing federal programs aimed at preventing child abuse and neglect and has not provided states or localities with clear direction on how to develop effective strategies for keeping children safe from abuse and neglect.

- Develop standard definitions, investigative procedures, and reporting requirements across all 50 states. Inconsistent state definitions of maltreatment, differing state legal standards for substantiating maltreatment, and barriers to multidisciplinary coordination compromise the ability to obtain comprehensive information. Nationally there are important steps we need to take to achieve more accurate counting and better understand what works.

- Provide adequate funding for access to high-quality services for parents (such as domestic violence services, substance abuse services, mental health services, home visiting, and more) that are often limited or nonexistent, especially in rural areas and particularly on American Indian reservations. Effecting change in families requires targeted and responsive services and supports that address the underlying issues that led to a report in the first place.

Conclusion:

We applaud the Commission’s work and final report and appreciate the attention the Commission’s work brought to this issue. We urge Congress and the President to act today with a sense of urgency on these recommendations. The report highlighted a lot of what we already know: there is no silver bullet and it takes a comprehensive strategy with a continuum of programs and services to support families and reduce risk.

We hope Congress leads the development of a coordinated national response that reflects and responds to the urgency of the issue. We hope they focus beyond only preventing fatalities to overall abuse and neglect because fatalities cannot be prevented if child abuse and neglect is not prevented. A thoughtfully developed comprehensive continuum of frontend primary prevention services and systems at all levels of the social ecology would be more impactful than a scattering of programs. What is needed is a comprehensive road map or strategy that promotes the wellbeing of all children energized by a shared vision that every child deserves the right to have a great childhood free from abuse and neglect.

The Commission recognized home visiting as an important intervention to reduce fatalities. Prevent Child Abuse America will continue to contribute our efforts through our evidence-based home visiting program, Healthy Families America, to strengthen families and prevent child abuse and neglect. The report should become the starting point for a call for universal services, a substantial increase in funding and action plans developed by each state based upon a national vision that every child deserves that great childhood.