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TO: **The Honorable Josh Shapiro, Chairman
Pennsylvania Commission on Crime and Delinquency**

cc: **John Hanger, Secretary of Planning and Policy, Governor's Office
Ted Dallas, Acting Secretary for the Department of Human Services
Members of PCCD's Children's Advocacy Center Advisory Committee**

FROM: **Cathleen Palm, Founder**

DATE: **April 22, 2015**

RE: **Advancing and measuring effective responses to child victims in PA**

Pennsylvania has worked with great intention, over the last several years, to better protect our children – across communities and the continuum of prevention.

We are in a historic time. The tide is finally shifting so that the needs and voices of abused children are better represented in the halls of power and at the tables where critical funding decisions are made.

Child advocates celebrate Pennsylvania's affirmation that the interventions offered to the child and the investigation that follows a report of suspected child abuse should be child-centered, interdisciplinary, trauma-informed, and coordinated.

Pennsylvania has smartly created a dedicated funding stream for children's advocacy centers (CACs), which will aid in the pursuit of healing and justice for the abused child. Placing oversight for that funding stream within the Pennsylvania Commission on Crime and Delinquency (PCCD) invites a broader interdisciplinary lens about how best to protect our children.

Still work remains.

Most notably, Pennsylvania still struggles to design, implement and measure our child protection and children's justice strategies across systems.

PCCD has the opportunity to help Pennsylvania see the bigger picture of how best to protect our children, secure justice for our abused children, and to be transparent and accountable in our decision-making.

This memo outlines some issues and questions that warrant consideration as next steps are taken in Pennsylvania's child protection policy and funding efforts:

1. **Are additional statutes or formal state guidance needed to establish an expectation (across disciplines) that child abuse investigations occur collaboratively?**
2. **How is Pennsylvania prepared to effectively respond to, investigate and treat abused children regardless the type of abuse?**
3. **How can VOCA victim assistance and compensation funding better connect abused children to critical services?**
4. **How will Pennsylvania operationalize the federally required Children's Justice Act Task Force and how will it relate to/differ from the CAC Advisory Committee in PCCD?**
5. **How will decisions about the Higher Education Monetary Penalty Endowment Act be informed by data, emphasize evidence-based practices and occur in a transparent way?**

Are additional statutes or formal state guidance needed to establish an expectation (of all disciplines) that child abuse investigations occur collaboratively?

"I continue to be concerned when a county has access to a CAC, but CYS and/law enforcement conduct their own interviews. We are seeing this on a regular basis in all the counties we serve. There is no accountability or requirement that CYS bring children to a CAC. I recognize it is difficult for DHS to make a requirement when there isn't a CAC in a county, but it is frustrating when there is a CAC. We are at a place in PA where there are many good CACs available across the Commonwealth, yet police and CYS make the decision as to whether they interview the child or bring them to the CAC. The DA can be influential, but not all DAs will insist on CAC referrals. It is concerning because then when the case goes to court, there is no video, no consistent statement from the child and the police officer or CYS investigator can't really attest to their skill at interviewing."

Email to C4CJ from a CAC Director on March 30, 2015

The concern cited in this unsolicited March 30th email from the leader of a well-established and respected CAC underscores that creating a CAC, in and itself, does not ensure that on-the-ground practice will be child-centered, coordinated and trauma-informed.

This email arrived as updated written guidance was being offered to county children and youth administrators. The Children and Youth Administrators' Resource Handbook was developed by the Office of Children, Youth and Families (OCYF) within the Pennsylvania Department of Human Services (DHS), the Pennsylvania Children & Youth Administrators Association (PCYA), and the Pennsylvania Child Welfare Resource Center.

Among the discussion points in the Handbook relates to "Collaboration with Partners." The document reminds administrators that "Collaboration and teaming with systems partners is a foundational component of PA's Child Welfare Practice Model." It continues to underscore that "keeping children safe and improving outcomes for children and families cannot be achieved without community partners working together." It then turns to "key collaborative partners that new administrators will want to become familiar with as they begin to plan their leadership of their CCYA." Included in the list of partners: County Commissioners, Citizen Review Panels, Juvenile Probation Officers, Medical Assistance Managed Care Organizations, the Office of Child

Development and Early Learning (OCDEL), the Pennsylvania Council of Children, Youth and Families Services (PCCYFS), and the Rehabilitation and Community Providers Association (RCPA).

In this section on collaboration and throughout the Handbook, there is no reference to law enforcement, district attorneys, or CACs.

The Handbook provides a general overview of recent changes in PA law noting that these changes “significantly impact the reporting, investigation, assessment, prosecution, and judicial handling of child abuse and neglect cases.” It does mention that legal changes promote “the use of multi-disciplinary investigative teams to investigate child abuse related crimes...” It continues, “The use of multidisciplinary teams and information technology will allow caseworkers, and the child welfare system as a whole, to function as a more holistic system supported by data to drive the most effective approaches to serving Pennsylvania’s children, youth, and families.”

In addition to the silence on law enforcement and CACs, the Handbook uses the word “promotes” versus requires the use of a multi-disciplinary investigative team to investigate “child abuse related crimes.”

Clearly CYS administrators have many documents by which they will be guided. Still, the Handbook is illustrative of a habitual problem facing Pennsylvania’s abused children – policy and practice related to high quality multidisciplinary child abuse investigations are often disconnected.

Consider that the central way in which child welfare funding flows to the states is virtually silent on the child abuse investigation. Even as the Child Protective Services Law (§ 6362. Responsibilities of county agency for child protective services) stipulates that the county agency is the “sole civil agency responsible for receiving and investigating all reports of child abuse” made pursuant to the CPSL.

The Needs-Based Plan and Budget Process (NBPB) required by state statute (Act 30 of 1991) and regulation, is the mechanism by which county children and youth agencies, informed by allied partners, report on service trends. Based on these trends and documented needs, the county agency requests state and federal child welfare funding.

Counties’ NBPB requests are reviewed by OCYF to determine the amount of state and federal funding needed for child welfare services. The projected funding level is then submitted to the Governor’s office to be included within the annual Commonwealth Budget. The Annual Child Abuse Report published by the Department of Human Services includes a limited discussion on expenditures. In its 2013 Annual Report, DHS wrote: “In state fiscal year 2012-2013, county expenditures for suspected abuse investigations were \$42.90 million.”

Outside of asking that a county include a chart to demonstrate the trends in intake investigations, the NBPB seeks no intentional focus on or encouragement of high quality multidisciplinary child abuse investigations. While a county could opt to use their NBPB to outline how they ensure that investigations are multi-disciplinary and the degree to which specialized services (e.g., forensic interviews, specialized medical evaluation) are provided, there is no such expectation outlined in the guidance to counties.

It may well be that the NBPB is not the right vehicle for planning for and measuring the number and quality of child abuse investigations, but then it seems important to determine if and where that is occurring. Also important to understand is the varied funding streams and training dedicated to investigating child abuse, including the interplay between them.

Advocates for children and the state-of-the-art approach of CACs have bristled when it has so often been suggested that creating a CAC in a community automatically means a child will only experience one interview.

Lost in the enthusiasm for such an effective model like the CAC is the stark reality that, in many communities, a good deal can unfold before the child ever reaches the CAC, including that the child and/or alleged perpetrator can be interviewed multiple times by varied disciplines. Also, memorandum of understandings (MOUs) between disciplines may not be well-crafted or are ignored in day-to-day practice.

It is worthy to remember that Pennsylvania long had a legal mandate requiring multidisciplinary investigations since the 1990s. In other words we had a key tool to reduce a child's trauma, to discourage taint for a long time, but too often the tool was under-utilized and accountability nonexistent. In many ways, Pennsylvania has not been behind the curve in recognizing the value of multidisciplinary investigations. Instead we too often lose focus after laws are enacted.

How is Pennsylvania prepared to effectively respond to, investigate and treat abused children regardless the type of abuse?

A year ago PCCD released a report developed by The Field Center for Children's Policy, Practice and Research at the University of Pennsylvania.

The report – Child Advocacy Center Statewide Plan Development: Technical Assistance to the Commonwealth of Pennsylvania – was supported by a subgrant of funds originating with the Office of Justice Programs, U.S. Department of Justice.¹

In the Report's Executive Summary, a CAC is described as a "child-friendly facility where multidisciplinary teams, including representatives from child welfare and law enforcement, can collaborate on child sexual abuse investigations and case planning."

The Report reinforces that traditionally CACs "respond to allegations of child sexual abuse." It does note, however, that some "have added on services for the victims of severe physical abuse and child witness to violence." Included below is a chart of the trends related to the types of abuse handled by Pennsylvania CACs. This chart was developed from data maintained by the National Children's Alliance (NCA).² NCA records data on the types of abuse reported by CACs (e.g., sexual, physical, neglect, child was a witness to violence, drug endangered).

Year	# of Children Served at a PA CAC	Reports Involving Sexual Abuse	Reports Involving Physical Abuse
2014	11,092	9,488	1,397
2013	9,525	8,085	1,088
2012	8,619	7,086	1,004
2011	7,991	6,518	1,142
2010	6,920	5,968	955
2009	7,680	5,749	1,623
2008	7,335	5,332	1,508
2007	6,385	5,021	1,161

¹ <http://www.pccd.pa.gov/AboutUs/Documents/PCCD%20Report%20Statewide%20CAC%20Plan.pdf>

² <http://www.nationalchildrensalliance.org/cac-statistics>

The Field Center, meanwhile, was able “to procure” data supplied by the PA Department of Human Services (formerly known as the Department of Public Welfare). This DHS supplied data, as noted in the report, has limitations including that it only encompasses substantiated reports of child abuse. The data also could not account for General Protective Services (GPS) cases that are often known as non-abuse or neglect cases or for law enforcement only (LEO) cases. The LEO cases involve an alleged perpetrator, who does not meet the specific definition of perpetrator in the Child Protective Services Law (CPSL).

It doesn’t appear that the Report prepared for PCCD explored the nexus between the children treated at a CAC and captured in the NCA data with the children who were subsequently determined to be a victim of a substantiated report of sexual abuse included in the DHS data.

With the limitations of the DHS data noted, the Field Center then estimated the “yearly number of sexual abuse investigations” in each region of the Commonwealth. Recommendations as to what type (e.g., countywide, regional, satellite) of CAC should be developed or expanded in PA were made based on the projected “investigations of sexual abuse per year.”

This Report and the discussions that have laid the foundation for expanding CACs in Pennsylvania has been very focused on child sexual abuse. Less understood is how the state is prepared to effectively respond to other types of abuse, including physical abuse.

Pennsylvania’s DHS indicates that approximately 25 percent of the injuries substantiated as child abuse in 2013 were physical in nature.³ A figure that likely will increase given recent changes to the definition of child abuse creating a lower threshold for physical injuries that can be substantiated as child abuse (impairment or substantial pain as compared to significant impairment or severe pain).

In other words, there is added urgency to understand the most effective path forward for the physically abused or neglected child.

Adding to the complication of understanding and planning for children, who experience abuse other than sexual abuse, is whether data currently exists about this population of children to inform on the type of investigation or services delivered in that early intake and investigation process.

In other words, do county children and youth agencies – within or outside of the NBPB – collect data about investigations and types of services incorporated to that intake and investigation stage and cross-tab this data to types of abuse investigated (as well as demographics)?

Through the NCA data, we can gain some insight into services provided to children, but only as it relates to children served at a CAC.

Year	Total PA Children Served at a CAC	On-Site Forensic Interview	Medical Exam, Treatment	Counseling Therapy	Referral to Counseling
2014	11,092	8,541	3,804	2,263	4,038
2013	9,525	7,385	2,992	1,741	3,201
2012	8,619	6,714	2,974	1,646	2,818

³ http://www.dhs.state.pa.us/cs/groups/webcontent/documents/report/c_086251.pdf

Year	Total PA Children Served at a CAC	On-Site Forensic Interview	Medical Exam, Treatment	Counseling Therapy	Referral to Counseling
2011	7,991	5,961	3,376	1,303	2,450
2010	6,920	4,782	2,633	1,204	2,313
2009	7,680	4,696	2,745	956	1,778
2008	7,335	4,318	3,027	1,021	2,680
2007	6,385	4,086	3,250	329	2,665

If data does exist, as part of the formal child welfare system and funding, is there then any opportunity for that data (about children served, services delivered) to be combined with data that will be collected quarterly by PCCD as part of the funding streams it oversees?

How can VOCA victim assistance and compensation funding better connect abused children to critical services?

The Crime Victims Fund was authorized in 1984 as part of Victim of Crimes Act (VOCA). Fines and penalties paid by federally convicted offenders, including those involved in corporate crime, are deposited into the fund. It was established as a dedicated funding stream that can only be used to provide direct assistance to crime victims. No tax dollars are deposited into the fund.

Despite the significant amount of money available in the Crime Victims Fund, Congress annually imposes a cap that has restricted the amount of funds available to directly aid crime victims. In FY 2014, the cap was set at \$745 million.

A well-organized and multiyear advocacy effort recently induced Congress to raise the cap in FY 2015, making \$2.361 billion of Crime Victims Fund monies available. This increase was included in the Consolidated and Further Continuing Appropriations Act, 2015, which was signed by President Obama on December 16, 2014.

Pennsylvania is preparing for a dramatic increase in federal VOCA funding dedicated to Victim Assistance and Compensation. It will be essential for PCCD to facilitate an intentional process, including review of reliable data and accurate assessment of need, before outlining the path forward.

A preliminary look at existing VOCA funding and abused children is included below.

Victim Assistance

- Last fiscal year, 163,034 victims were served through the Victim Assistance program.
- Approximately 13 percent of Pennsylvania’s VOCA assistance dollars assisted child abuse victims. Federal law requires that, at least 10 percent, of the state’s funding be made available to victims of child abuse. More than 20,000 Pennsylvania child abuse victims received services paid for with victim assistance resources. Eighty-four 84 percent or 17,562 were victims of sexual abuse and 16 percent (3,357) were victims of physical abuse.
- Looking back to 2000, nearly 18 percent of VOCA assistance funding in Pennsylvania benefited child abuse victims.

Victim Compensation

- PCCD reports that there were a total of 3,866 claims (\$2.535 million payout) for minor victims in 2014. 3,210 of the claims related to costs associated with a forensic rape exam (FRE). The FRE costs paid by compensation accounted for \$2.16 million of the total \$2.535 claims paid for minors in 2014.
- Included in the remaining 646 claims (\$374,956) involving minors were:
 - Assault (153 claims)
 - Assault Domestic (58 claims)
 - Burglary (6 claims)
 - Homicide (42 claims)
 - Homicide Domestic (13)
 - Kidnapping (4 claims)
 - Sexual Assault – Family (157)
 - Sexual Assault – Non-Family (162)

Now is the time to evaluate to what degree this funding reaches child victims - across the continuum of maltreatment types and a child victim's experiences (e.g., investigation, court proceedings, post-investigation/court proceedings).

We should better understand how forensic interviews (FI) are paid for and whether reimbursement is at all linked to the qualifications of the interviewer, location where the FI occurs, or timing of the medical evaluation. Pennsylvania needs to decide if it will establish an expectation that FIs occur as part of a multidisciplinary response/investigation and that every FI be recorded.

The timing is also ideal to understand the considerations that impact a child's access to a specialized medical evaluation. Are there barriers to getting reimbursement for medical procedures undertaken in response to physical child abuse (vs. child sexual abuse)? In general we should explore what entity determines whether a child gets connected to medical care during the investigation and to what degree is that decision made based on funding.

See the chart below for national trends for VOCA and child abuse victims.

Number and Types of Victims Served ⁴	2008	2009	2010	2011	2012
Total Victims Served—Victim Assistance	3,780,068	3,526,610	3,609,421	3,760,235	3,486,655
➤ Child physical abuse victims served	160,484	143,052	171,823	169,024	182,775
➤ Child sexual abuse victims served	390,225	355,723	395,192	379,971	374,165
Total # of Victim Compensation Claims Paid	151,643	169,992	185,915	181,833	147,469
➤ Child physical and sexual abuse claims paid	28,785	40,354	28,550	30,607	28,266

⁴ Data retrieved from VOCA Nationwide Performance Reports.

Total Victim Compensation Payments	\$431,904,585	\$452,121,845	\$468,751,057	\$464,619,304	\$394,317,033
➤ Child physical and sexual abuse payments	\$27,213,552	\$26,663,693	\$28,984,335	\$29,692,640	\$28,402,992

How will Pennsylvania operationalize the federally required Children’s Justice Act Task Force and how will it relate to/differ from the CAC Advisory Committee in PCCD?

Congress has authorized that up to \$20 million of VOCA funding be allocated to meet the purposes of the Children’s Justice Act (CJA).

States compliant with the federal Child Abuse Prevention and Treatment Act (CAPTA) that maintain a state-level CJA Task Force and undertake a comprehensive three-year assessment of the state’s “investigative, administrative, and judicial handling of cases of child abuse and neglect” are eligible for CJA funding.

Pennsylvania’s projected FY 2014 CJA allocation is \$572,229. FY 2014 funds must be obligated no later than September 30, 2016 and liquidated by December 30, 2016.

CJA funding must be used to improve:

1. The assessment and investigation of suspected child abuse and neglect cases, including child sexual abuse and exploitation, toward minimizing the trauma experienced by a child and the child’s family;
2. The assessment and investigation of cases of suspected child abuse fatalities and near fatalities;
3. The investigation and prosecution of child abuse and neglect cases, including child sexual abuse; and
4. The assessment and investigation of cases that involve a child with a disability or serious health children challenge, who are suspected victims of child abuse or neglect.

Grants have to be used to support activities or strategies in three focus areas:

1. The investigative, administrative, and judicial handling of child abuse cases, including child sexual abuse and those involving a fatality or near fatality or multiple jurisdictions with a particular focus on reducing childhood trauma and ensuring fairness to the alleged perpetrator;
2. Model or demonstration programs that test and promote innovative approaches toward improving timely and successful civil and criminal court proceedings or enhance judicial effectiveness in child abuse cases, especially child sexual abuse cases; and
3. Reform of policies, practices and protocols in order to ensure fuller protections for children.

CJA funding may not be spent on treatment services or prevention programs. See the chart below about CJA funding in PA.

Pennsylvania’s DHS has designated some members of its PA’s Child Abuse Prevention and Treatment Act (CAPTA) Working Group as its CJA Task Force. The broader CAPTA Workgroup, which is organized and convened at the direction and discretion of the DHS last met in June 2012.

High quality work has been undertaken by a small group of individuals mobilized through a CJA subcommittee. Still key decisions, including those related to awarding CJA funding rests solely with DHS and members of the CJA Task Force have not been consulted on or able to review Pennsylvania's CJA application before it is submitted to the federal government. It has been approximately a year since DHS last convened this smaller CJA subcommittee.

The absence of an objective state-level interdisciplinary mechanism to examine child protection policies and practices – across agencies and systems - became evident in 2010 and throughout 2011 (pre the arrest of Gerald Sandusky). At that time, child protection advocates formally urged study of why Pennsylvania was a statistical outlier in when a child abuse report triggers an investigation and if a child is later determined to be a victim (1.2 per 1,000 children in Pennsylvania; 9.3 per 1,000 children nationally). Child protection activists urged an intentional study of how PA defined, reported and investigated child abuse. Such a study was routinely dismissed by policy makers and DHS officials until a tipping point arrived with the arrest of Sandusky.

Despite enacting 23 new child protection laws, Pennsylvania did not address how child protection and children's justice would be monitored and accountable across state-level agencies and systems. As a consequence, intentionality, accountability and transparency are quite limited.

Among the [recommendations of the PA Task Force on Child Protection](#) in 2012 was to statutorily create the Children's Justice Act (CJA) Task Force. They noted that such a task force was not only required by federal law but had great value in that it "would bring real-world experience to the discussion of future child protection policy." It was also envisioned as "providing technical assistance and conducting review of actual cases."

States vary in the agency designated to coordinate and oversee the operations of the CJA Task Force. Lead agencies in the states can include the Governor's Office, Attorney General or Department of Human Services. State CJA Task Forces are required to include representation from:

- Law Enforcement
- Criminal Court Judge(s)
- Civil Court Judge(s)
- Prosecuting Attorney(s)
- Defense Attorney(s)
- Child Advocate(s) (Attorney(s) for Children)
- Court Appointed Special Advocate Representative(s), where such programs are in operation
- Health Professional(s)
- Mental Health Professional(s)
- Child Protective Service Agencies
- Individual(s) experienced in working with children with disabilities
- Parents and Representative of Parent Groups
- Adult former victims of child abuse and or neglect; and
- Individuals experienced in working with homeless children and youths

Pennsylvania's Act 28 of 2014 established a Child Advocacy Center Advisory Committee (CACAC) within PCCD. This Committee, which will not exceed twenty-one members, will be appointed by the PCCD Chairman. The Committee must include the following:

- The Victim Advocate
- The Deputy Secretary of the Office of Children, Youth and Families within DPW;

- Representatives with “experience in the multidisciplinary investigation of child abuse and the use and operation of a CAC” from:
- Child advocacy centers;
- County children and youth services agencies;
- Municipal police departments;
- PA State Police;
- District Attorneys;
- Victims’ Service Providers; and
- Medical and mental health professionals

Members serve for four year terms eligible for up to two consecutive terms or eight years. The Chair of the Committee will be chosen “and serve at the pleasure of the Governor.” The Committee would be charged with:

- Functions related to “the direct approval and disbursement” of grants to CACs and multidisciplinary investigative teams “in an advisory capacity only” after having the opportunity “to review and comment on grant applications;”
- Advise PCCD on “the definition, development and correlation of programs and projects and the establishment of priorities for” CACs and MDITs; and
- “Provide assistance and advice” to PCCD “on any other matters” related to CACs and MDITs

Recipient of CJA Funding	Federal FY Year	Total Amount	Description
PA Chapter of CACs/MDITs	2011 Thru 2012	250,000 ⁵	Promote, assist, and support the development, growth and continuation of the multidisciplinary process with a particular focus on improving the effectiveness of the joint investigative approach for the protection of Pennsylvania’s children (known as the Continuous Practice Improvement Program).
Pennsylvania Children and Youth Solicitor’s Association	2011	220,000 ⁶	Utilizing the ChildFirst training, improve investigative handling of child abuse and neglect cases while reducing secondary trauma to children by providing County Children and Youth Agency staff and their teams forensic interviewing training.
Clinton County	2012	15,741 ⁷	The purchase of video recording equipment and a contract with a consultant to support protocol development and to improve the overall quality of the investigation process.
Lackawanna County District Attorney’s Office	2012	81,000 ⁸	The formation of a special team made up of law enforcement and child protective services representatives to assess, investigate and prosecute, if necessary, all fatalities in a manner that enhances accountability of child abusers and, in cases involving accidental, medical or natural deaths, to establish focused response to make such deaths more preventable.

⁵ Children’s Justice Act Subcommittee May 18, 2011 meeting minutes.

⁶ Ibid.

⁷ FY 2012 Children’s Justice Act State Grant Funds Application submitted by Pennsylvania Governor Tom Corbett to the Administration on Children, Youth and Families, May 31, 2012.

⁸ Ibid.

Recipient of CJA Funding	Federal FY Year	Total Amount	Description
Philadelphia Children's Alliance	2012	109,200 ⁹	2-year grant to fund a full-time forensic interviewer to increase PCA's capacity to serve child victims of sexual abuse in Philadelphia.
York County CAC	2012	104,000 ¹⁰	Hire and training of a forensic interviewer to support interviews of children with developmental disabilities as well as provide training to team members.
PA Children & Youth Solicitors	2012	190,000 ¹¹	
PA Chapter CACs/MDITs	2013	214,000 ¹²¹³	Expand training and mentoring to established MDTs to include but not limited to Mobile Mentoring, Forensic Peer Review Meetings, and CAC MDT Conferences. Continue to provide technical assistance to MDT Coordinators and introduce advanced team development training to established MDTs.
PA Children & Youth Solicitors	2013	40,000 ¹⁴	Provision of one training session of ChildFirst - a standardized training for child interviews that all counties can access and use to strengthen and improve the investigation, handling and prosecution of child abuse and neglect cases.
PA Child Welfare Resource Center	2013	55,000	To oversee all grant activities funded with CJA grant money. Increase knowledge base and resources by annual participating in federally initiated CJA meeting.
PA Commission on Crime and Delinquency	2013	Unknown ¹⁵¹⁶	Grants will be given to county multidisciplinary investigative teams to strengthen their individual practice. Teams will apply for grants by submitting a proposal including a description of the implementation strategies and the proposed budget. These mini-grants are established to strengthen multidisciplinary investigative teams (MDITs) and children's advocacy centers (CACs).
PA Child Welfare Resource Center	2014	34,863	To oversee all grant activities funded with CJA grant money. Increase knowledge base and resources by annual participating in federally initiated CJA meeting.
Undetermined	2014	537,366 ¹⁷	PA intends to utilize the 2014 funds to further strengthen the local multidisciplinary investigative teams (MDITs) through the offering of mini grants. Pennsylvania also intends to review the recent legislative amendments to determine whether any of the amendments and resulting implementation require financial support through the use of CJA funds.

⁹ Ibid.

¹⁰ Ibid.

¹¹ Ibid.

¹² Children's Justice Act Subcommittee Meeting, February 19, 2014.

¹³ It is unclear if this CJA funding is in addition to \$150,000 that has been "earmarked" for the PA Chapter of CACs/MDITs by the Children's Advocacy Center Advisory Committee as noted in the CACAC's August 4, 2014 minutes. This \$150,000 in earmarked funding is part of approximately \$400,000 made available to the state Chapter through Act 27 of 2014 (reallocation of unspent Drug Abuse Resistance and Education funds). The CACAC meeting minutes indicate this \$150,000 is to continue the Chapter's CPIP.

¹⁴ Ibid.

¹⁵ FY 2014 Children's Justice Act State Grant Funds Application submitted by Governor Tom Corbett to the Administration on Children, Youth and Families on May 27, 2014.

¹⁶ A specific dollar figure is not cited in the document. Minutes from the August 4, 2014 meeting of the Children's Advocacy Center Advisory Committee within PCCD indicate that 52 counties applied for mini-grants (up to \$10,000) at a total request of \$513,105.69.

¹⁷ It is unclear from the PA CJA applications submitted to ACF the degree to which this amount of funding is the same as or different than the earlier referenced funding to be directed to PCCD in FY 2013 for mini-grants.

How will decisions about the Higher Education Monetary Penalty Endowment Act be informed by data, emphasize evidence-based practices and occur in a transparent way?

[The Higher Education Monetary Penalty Endowment Act](#) (Act 1 of 2013) requires that the established endowment exist for a minimum of five years and during those five years “not more than 50% of the monetary penalties paid into the endowment shall be expended annually.”

It is Act 1 of 2013 that will govern the disbursement of \$48 million in funding realized as part of the agreement negotiated by PA [Senate Majority Leader Jake Corman \(R-Centre\)](#) between Penn State and the National Collegiate Athletic Association (NCAA)

PCCD will be responsible for awarding the funding related to the following purposes:

1. Programs or projects preventing child sexual abuse and/or assisting the victims of child sexual abuse;
2. Multidisciplinary investigative teams established by PA law;
3. Child advocacy centers;
4. Victim service organizations that provide services to children subjected to sexual abuse; or
5. Training of persons who are mandated by law to report child sexual abuse or to treat victims of child sexual abuse.

Before awarding any funding, Pennsylvania should drive intentional review of child protection funding streams and strategies across disciplines, state agencies and communities. This review should combine with a commitment to research, evaluation and evidence so that resources are not just made available to plug budget holes, but balanced with the need to establish a foundation for sustained and measured change in culture and practice.

Finally, development of any funding application, review of submitted funding requests, and ongoing measurement of the outcomes being secured with Act 1 funding should unfold in an interdisciplinary and transparent way. Particular attention should be given to guarding against conflict of interests so that identification of priorities and awarding of funding is not advanced by the same individuals/organizations that could eventually benefit from the funding.