

DSS

Serving Children and Families

V. SUSAN ALFORD
STATE DIRECTOR

NIKKI R. HALEY
GOVERNOR

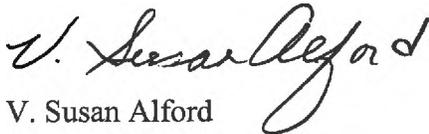
May 20, 2016

The Honorable Nikki R. Haley
Governor of South Carolina
South Carolina State House
Post Office Box 12267
Columbia, South Carolina 29211

Dear Governor Haley:

Please find enclosed, for your signature, South Carolina's application for the Children's Justice Act (CJA) grant for FY 2016. The South Carolina Department of Social Services works collaboratively with the South Carolina Children's Justice Act Task Force and the Children's Law Center at the University of South Carolina, School of Law to administer this continuation grant. CJA grant funds are used to support services delivered statewide to improve the civil and criminal prosecution of child abuse and neglect in South Carolina.

Sincerely,



V. Susan Alford
State Director

Enclosure

DSS

Serving Children and Families

V. SUSAN ALFORD
STATE DIRECTOR

NIKKI R. HALEY
GOVERNOR

May 20, 2016

Mr. Rafael Lopez, Commissioner
Administration on Children, Youth and Families
Mary E. Switzer Building, 330 C Street, SW
Washington, D.C. 20201

Dear Mr. Lopez:

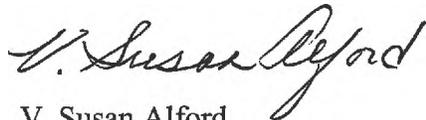
In accordance with the requirements of the Children's Justice Act Grant, please acknowledge this letter as certification of the following:

- (a) **South Carolina received the FY 2015 child abuse and neglect Basic State Grant and continues to comply** with the requirements stipulated in Section 106(b) of the Act; or the State has received a recently rendered Federal decision attesting to the State's current compliance with the requirements for the Basic State Grant under Section 106(b); **and**
- (b) Not applicable to South Carolina
- (c) **South Carolina has maintained a State multidisciplinary task force on children's justice** (only for those States currently receiving CJA funds); **and**
- (d) **South Carolina has adopted or continues to progress in adopting recommendations of the State Task Force** or a comparable alternative to such recommendations; **and**
- (e) **South Carolina will make such reports to the Secretary as may reasonably be required, including an annual report** on how assistance received under this program was expended throughout the State, with particular attention to the areas described in paragraphs (1) through (3) of Section 107(a); **and**
- (f) **South Carolina will maintain and provide access to records relating to activities under CJA; and**
- (g) **South Carolina will participate in at least one Federally initiated CJA meeting each year that the grant is in effect and are authorized to use grant funds to cover travel and per diem expenses for two CJA representatives (CJA Coordinator and Task Force Chairperson) to attend the meeting.**

Mr. Rafael Lopez, Commissioner
May 20, 2016
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The Children's Justice Act helps South Carolina in its efforts to improve the child welfare and criminal justice system and services to children and families in the State.

Sincerely,



V. Susan Alford
State Director

I hereby certify the above information pursuant to applicable law.

The Honorable Nikki R. Haley
Governor, State of South Carolina

2016

SOUTH CAROLINA

CHILDREN'S JUSTICE ACT TASK FORCE

APPLICATION & REPORT

UNIVERSITY OF SOUTH CAROLINA
CHILDREN'S LAW CENTER



UNIVERSITY OF
SOUTH CAROLINA
School of Law

Prepared by Mandy Bowden,
Children's Justice Act Coordinator

**South Carolina
Children's Justice Act Task Force
Application and Report
May 2016**

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II. CJA Task Force

South Carolina has maintained an active Children's Justice Act Task Force since 1994. The purpose and activities of the Task Force, as defined by its bylaws and federal statute, are as follows:

- To conduct an assessment of the state's systems responding to abused and neglected children at three-year intervals;
- To adopt recommendations in each of the CJA categories;
- To work towards implementation of these recommendations;
- To recommend to the state's grantee (S.C. Department of Social Services) projects to be supported by the CJA grant funds; and
- To express positions on legislation or state policy issues, consistent with its mission and recommendations.

The Task Force is governed by bylaws which were adopted in 1998 and most recently revised on April 15, 2011. In accordance with the bylaws, the Task Force meets at least quarterly. Standing committees are formed every three years to coincide with adoption of recommendations. Each committee meets at least quarterly, and as needed, to follow through with implementation of the recommendations adopted by the Task Force. Nearly all members are actively involved with a committee.

The Task Force is self-perpetuating through an election process held every three years. Current members propose new members when necessary and prepare a slate of nominees, ensuring multidisciplinary and diverse membership. New members are elected for three-year terms by a majority vote of the Task Force. The Chairperson appoints members to fill vacancies that occur between general elections. Officers include a Chair and Vice-Chair who are also elected by the Task Force.

Members for the 2015-2018 period were elected in October 2014 with nearly all members re-elected. Pam Robinson, a volunteer guardian ad litem and an attorney for children, was re-elected Task Force Chair, and Dr. Elizabeth Ralston, a mental health professional, was re-elected Vice-Chair. Several members resigned from the Task Force at the conclusion of the 2012-2015 cycle and five new members were nominated and appointed to fill those vacancies in July 2015. The Task Force currently has thirty-two members, reflecting all required disciplines. The make-up of the Task Force includes:

- Law Enforcement Community – 3 members
- Criminal Court Judge(s) – 1 member
- Civil Court Judge(s) – 2 members
- Prosecuting Attorney(s) – 2 members
- Defense Attorney(s) – 1 member
- Child Advocate(s)/(Attorney(s) for Children) – 2 members
- Court Appointed Special Advocate Representative(s) – 2 members
- Health Professional(s) – 2 members

- Mental Health Professional(s) – 2 members
- Child Protective Service Agencies – 2 members
- Individual(s) experienced in working with children with disabilities – 3 members
- Parents and Representative of Parent Groups – 2 members
- Adult former victims of child abuse and/or neglect – 1 member
- Individuals experienced in working with homeless children and youths – 1 member
- Misc. other disciplines/At-large members – 6 members

The Task Force conducted a review and assessment of the state’s systems that respond to abused and neglected children on February 27, 2015, leading to the formulation of recommendations for the 2015-2018 CJA cycle. Work will be concluded on the recommendations by the end of the 2015-2018 period. The Task Force Chair established four new standing committees for the 2015-2018 period. It was decided that four multidisciplinary groups, instead of committees grouped by similar discipline, would be created. Members were randomly assigned to the following work groups:

1. Reporting and Responding Team
2. System Interaction Team
3. System Improvement Team
4. Permanency & Solutions Team

Each group was randomly assigned five to seven recommendations from the list and then asked to rank them in order of priority preference.

The Children’s Law Center provides staff support to the Task Force, including logistical arrangements for meetings and research activities. In addition to the CJA coordinator who assists with implementation of recommendations, an additional staff person is assigned to each group to facilitate their meetings and act as liaison between the Task Force groups and CJA Coordinator. The Children’s Law Center also carries out training recommendations of the Task Force.

Attachment 1 includes a list of Task Force members with their titles, professional categories, and brief profiles, and the Task Force’s multidisciplinary groups with corresponding members. Attachment 2 contains minutes of the four meetings held during the past year, and current recommendations are in Attachment 3. Attachment 4 includes the Task Force bylaws.

III. Annual Performance Report: May 2015 - April 2016

The South Carolina Department of Social Services is the state’s designated grantee for Children’s Justice Act funds. In accordance with one of the Task Force’s recommendations, the Department of Social Services contracted with the University of South Carolina’s Children’s Law Center to provide staff support for meetings and assist the Task Force in implementing its recommendations. This performance report covers Task Force activities from May 2015 –April 2016.

At the guidance from the Task Force, The Children's Law Center is making strides to implement innovative ways to evaluate and measure training objectives. One of the implemented trainings that is reported in this section, utilized a new pre and post survey to measure knowledge gained during the training (see attachment 5). Another training is utilizing a long term post survey to attempt to measure behavior change in the field. In addition, the Drug Endangered Children trainings are undergoing a federally funded independent evaluation process.

As part of the Task Force's assessment process in 2015, South Carolina's Child and Family Services Plan (CFSP) was a major component of aligning recommendations and statewide efforts. Some crossover areas that the Task Force is focusing on from the CFSP strategic goals are trauma-informed practice and screenings and support and tracking of kinship caregivers. Many Task Force members are active in stakeholder meetings such as the one held by SCDSS about their strategic action plan for 2015-2019 held in March, 2016. Members will continue active participation in such processes and be mindful of Annual Progress and Services Reports. The Task Force is also fortunate enough to have the state's CIP director, who is also the Director of SC Court Administration, as an active member. This easily creates opportunities for collaboration and information sharing.

A. Activities undertaken to improve the investigative, administrative, and judicial handling of cases of child abuse and neglect, particularly child sexual abuse and exploitation, as well as cases involving suspected child maltreatment related fatalities and cases involving a potential combination of jurisdictions, such as intrastate, interstate, Federal-State, and State-Tribal, in a manner which reduces additional trauma to the child victim and the victim's family and which also ensures procedural fairness to the accused.

- **A.1. Alternative placement/caregivers** (Group 2, rank 1)
Recommendation outcome: Children in alternative placements remain safe and stable while maintaining and/or increasing their well-being by improving accountability and tracking of those placements.

There has been much conversation in our state about kinship caregivers among our child serving stakeholders. A Task Force group met with DSS in October of 2015 to analyze and learn about current policies and procedures regarding kinship care. Many Task Force members have been at the table of various stakeholder meetings and groups that are examining how to best address our population of kinship caregivers.

The Department of Social Services has implemented a new tracking system for the kinship care placements in their CAPPs system in August of 2015. South Carolina is one of a few states that have started tracking these informal placements without court involvement. More training is needed to fully comply with recording this data. This newly collected set of data will be reviewed as it continues to be collected.

- **A.3. Training for Coroners (Group 3, Rank 1)**
Recommendation outcome: Increased compliance of South Carolina coroners to the reporting of child deaths resulting from abuse and neglect.

The Task Force has been inquiring and learning about current state Coroner training requirements and special child death teams that have been implemented in three counties. Data was obtained and reviewed on the number of SC coroners certified in the preferred week-long ABMDI training and the number revealed was very low. Next the Task Force plans to determine what the costs and components of a local satellite training would be. The group will survey coroners to ask what they need and what resources are lacking, concentrating on smaller counties with fewer resources. The Task Force plans to coordinate with the Coroner's Training Advisory Committee.

- **A.4. Timely processing of DSS court cases (Group 4, rank 1)**
Recommendation outcome: Increased timeliness for permanence of children in SC DSS custody by reducing delays in court proceedings.

The Task Force members of this group are working closely with our state Court Improvement Program (whose Director is a Task Force member) to address this recommendation. The South Carolina Court Liaison project data, including a "reasons for continuances" report, was reviewed. Attorneys not appearing for court was identified as an avoidable continuance reason. The group has decided to draft a letter to attorneys about the residual harm to children and incurred costs from continuances when attorneys do not appear at court hearings. Alternative docket management programs such as the "rocket docket" and "ABC docket", currently being utilized in certain counties, are being reviewed to determine if they would be suitable models for recommended use in other areas.

- **A.6. Impact of trauma training (Group 1, rank 4)**
Recommendation outcome: Increase the knowledge of law enforcement and family court regarding the impact of trauma on children.

The Task Force has acknowledged that there is a statewide effort to coordinate trauma training throughout the state by the Department of Social Services, the Department of Juvenile Justice, and Project Best. Members are investigating current efforts so that strategies can align with these efforts and incorporate a plan to integrate ACE trainings for target recipients.

- **A.8. Training for clergy/faith leaders (Group 1, Rank 2)**
Recommendation Outcome: Increase adherence by clergy/faith leaders to mandated reporting requirements.

At the recommendation of the Task Force, the Children's Law Center launched a pilot training directed at church leaders called *Child Abuse & Trauma: Recognize, Report and Respond*. This 3-hour presentation provides a comprehensive training combining the principles of Adverse Childhood Experiences (ACEs) and SC's Mandated Reporting laws,

and specifically focuses on information relevant to Clergy Members. Topics include indicators of maltreatment, legal requirements related to reporting, handling the report, interface with DSS intake staff, documentation, brief overview of the child protection and criminal justice systems, and discussion of reasons professionals fail to report. Also included in this training is an expanded presentation on the Clergy-Penitent Privilege which provides an in-depth understanding of how the privilege applies to mandated reporting. The lack of information and understanding of the law relating to this privilege often creates confusion for Clergy Members, which deters the reporting of abuse and neglect. The training provides the proper guidance to assist Clergy Members in determining when and how to report in accordance with the law to avoid any liability. Part two of the training examines the effects of trauma on children and understanding ACEs (Adverse Childhood Experiences). Training participants learn examples of adverse childhood experiences, examine the ACE Study and its' findings, explore why ACEs are so powerful and what can be done to promote resilience, recovery and self-healing communities. A specialized guide for clergy members was created for participants to keep that coincides with this training.

Outreach to many different faith denomination organizations was made in an effort to offer the training to a wide variety of church groups. The first two groups to respond and schedule training was the Lutheran conference and the Cooperative Baptist Fellowship of SC. The first training held was for the Lutheran church leaders held in Columbia in January of 2016 with 12 participants. The second pilot was held for Baptist church leaders in Greenville in March of 2016. There were 12 participants in each class which proved to be a very favorable number for the trainer to facilitate questions and conversations. The Lutheran training also yielded an invitation for the attorney trainer to come to the Lutheran Theological Seminary School to present to a class of 8 students in the graduating class on the mandated reporter material. This will hopefully be a repeat invite for future graduating classes. The Cooperative Baptist Fellowship has requested two more trainings for other areas that are scheduled for May, 2016.

A pre and a post survey was created and administered to the training attendees to increase the ability to measure the knowledge gained (Attachment 5). For part one of the first pilot training, Reporting Child Abuse, there was a 55% increase in scores from the pre to post survey. The second part addressing ACEs had an increase of 86% compared to the participants' average score before the training. The significant increase in part two indicated the lack of knowledge from this population on this topic prior to the training. The created pre and post tests are included in the appendix. A need for more information about South Carolina's Safe Haven for Abandoned Babies statutes was identified. Posters were obtained from another organization to distribute to church personnel at future trainings. Outreach will continue to optimally train as many denomination groups as possible.

- **A.9. Drug Endangered Children (DEC) (Group 3, rank 3)**
Recommended outcome: Increase knowledge regarding Drug Endangered Children (DEC) guidelines.

The South Carolina Drug Endangered Children Committee updated and expanded the SCDEC protocol, using the federal protocol as a template in February of 2014. The guidelines were endorsed by applicable agency heads and an alliance was established with 22 federal, state, and local leaders to identify and protect drug endangered children in South Carolina. Since that time, training initiatives for law enforcement agencies have ensued with seminars focused on updating participants on the updated DEC guidelines, statutes pertaining to these guidelines, and responding to children found in drug environments.

In June of 2015, A Senior Resource Attorney from the Children's Law Center participated in a video recorded webinar produced by the SC Criminal Justice Academy and the US Attorney's Office that was created to educate law enforcement on the DEC protocol and remain available online. The biggest training of the year was a full-day seminar, "Drug Endangered Children in a Toxic Environment," that was jointly hosted by the Children's Law Center, Greenville Heath System, SC Alliance for Drug Endangered Children, and the US Attorney's Office. The seminar was offered on three consecutive days in July of 2015 in three areas of the state. In addition to a review of the SCDEC guidelines, the agenda included presentations from local law enforcement officers who investigate DEC cases and gave example case scenarios. National speaker, Sgt. Jim Gerhardt, with Colorado Thornton PD and North Metro Task Force, was brought in to present on the challenges that his state has been facing since the legalization of marijuana. Attendees included a wide variety of child abuse professionals, and 356 were trained over the three days. Another 75 people were trained at a DEC workshop presented by the Children's Law Center at the annual Children's Trust Conference in September.

A federally funded independent evaluation has been approved for the regional DEC trainings. Results will be forthcoming.

- **A.10. Child death investigations** (Group 3, rank 1)
Recommendation outcome: Improve the coordinated and multidisciplinary approach to child deaths.

This recommendation is being addressed in conjunction with Recommendation A.3. (Training for Coroners). In addition, The Children's Law Center provides a three-day intensive Child Death/Homicide Investigation training course for law enforcement who investigate these cases. This training includes Sudden Infant Death Syndrome versus Suffocation, Abusive Heat Trauma, Neglect/Failure to Thrive, Battered Child Syndrome, and other types of child deaths. This course is designed to help participants identify the complexity of child death investigations to include crime scene documentation and corroboration of statements, the importance of timelines, comparison of caretaker's statements to the medical and forensic evidence, interview techniques, checklist for investigators, and the importance of court preparation. Two of these trainings were offered this year in October of 2015 and February of 2016 with a total of 42 investigators trained.

- **A.11. MDT Training (Group 1, rank 3)**

Recommendation outcome: Increase the coordination and collaboration between multidisciplinary teams in the comprehensive investigation of child abuse cases.

The Children's Law Center and the SC Network of Children's Advocacy Centers, in conjunction with the Task Force, conducted a training and consultation program for county child abuse investigative teams. Jerri Sites, a training consultant from Missouri, addressed MDT roles and responsibilities, development of investigation protocols, team functioning, exchange of information, and conflict resolution. It was agreed that Ms. Sites would work with 4-6 county teams selected through an application process. Team members included child protection staff, DSS county attorneys, law enforcement, a medical professional, a prosecutor, a children's advocacy center interviewer, and other community professionals. The team had to apply together with at least one person representing each discipline for their county. This program involved four phases: (1) a pre-assessment completed by each team; (2) a two-day centralized training on the investigation process and protocol development; (3) completion of team assignments; and (4) follow-up consultation in each community. Team members representing four counties participated in the centralized training sessions on May 7-8, 2015. This two-day training led by Ms. Sites involved a discussion of the need for MDTs and the need for any improvements or changes. A list of goals was also established for each county.

Jerri Sites conducted follow-up communications with the team leaders to ensure that each MDT had met their goals established at the earlier meeting and that they were functioning as active MDTs with all necessary disciplines. Three of the counties' needs assessment resulted in a request for advanced training for their members. Site visits were planned during the week of October 14-16, 2015 with trainings scheduled in the following counties: Beaufort, Colleton, and Lancaster. Ms. Sites presented a half-day training on Best Practice and the Value of Corroborative Evidence for the Lancaster team (130 attendees) and again for the combined Beaufort/Colleton team (30 attendees). She presented a full-day training addressing the topics of Understanding Children with Concerning Sexual Behaviors and MDT Response to Recantation. This training was opened up to any MDT member throughout the state and had about 40 attendees. All of the trainings were well received and provided a much needed forum for discussion amongst county team members. Ms. Sites continues to stay in touch with team members for any consultation that is needed.

Because this basic MDT Training has served many counties over the last three years, it was decided to offer a more advanced team training for 2016. An MDT training survey assessment was sent out to all Children's Advocacy Centers to share with their MDT partners. The survey was administered via Survey Monkey and yielded very useful responses regarding their training needs. When asked to rate a list of possible advanced training topics, Sexual Behavior Problems was the most requested training. Due to that information, the more advanced MDT training for 2016 is planned to also address this topic.

- **A.12. Abusive head trauma (Group 2, rank 2)**
Recommendation outcome: Increase the recognition of cases involving abusive head trauma by law enforcement, SCDSS, coroners and solicitors.

This Recommendation is being addressed in conjunction with Recommendation A.10 (Child death investigations). The Child Death/Homicide Investigation training mentioned in that section specifically addresses Abusive Head Trauma. Additionally, the Task Force recommended adding the implementation of measuring tools of effectiveness for these trainings. One of these methods includes a longer term survey to participants to measure behavior change based on the training received. A six month post survey was administered to the training participants from October, 2015 and the survey will also be sent six months after the February, 2016 training to those participants.

- **A.13. Mandated reporter training (Group 1, rank 1)**
Recommendation outcome: Increase compliance with the mandated reporter requirements in South Carolina including newest reporters added to the mandated reporter legislation.

The Task Force has reviewed the Children's Law Center's Mandated Reporter outreach plan and made suggestions for additional groups to be added. A lead Mandated Reporter Attorney Trainer is being hired and will be able to expand on the current outreach. Currently, the Children's Law Center, in collaboration with Task Force members, is providing extensive training to professionals statutorily required to report child abuse or neglect. Training topics include indicators of maltreatment, legal requirements related to reporting, the handling of reports, interface with SCDSS intake, documentation, brief summaries of the child protection and criminal justice systems, and reasons professionals may fail to report. Specialized sessions are offered to law enforcement officers, clergy, teachers, and other specific disciplines. Mandated reporter trainings are offered as an in-service training to school districts, medical facilities, and other groups of mandated reporters. Training is also offered to USC students who work with children in internships or are in a field of study rendering them likely to become mandated reporters. During this reporting period, a total of 2,645 participants were trained. Other trainees on the extensive list include in-home therapists, church members and volunteers, EMS and fire personnel, Department of Juvenile Justice staff, Head Start workers, magistrate and municipal judges, school administrators, social workers, guidance counselors, nurses, and volunteer guardians ad litem. No movement has been made on the introduced legislation that would add additional mandated reporters to the list.

B. Support of experimental, model, or demonstration programs for testing innovative approaches and techniques which may improve the prompt and successful resolution of civil and criminal court proceedings or enhance the effectiveness of judicial and administrative action in child abuse and child neglect cases, particularly child sexual abuse and exploitation cases, including the enhancement of

performance of court-appointed attorneys and guardians ad litem for children, and which also ensure procedural fairness to the accused

- **B.2. Specialized hearing officers** (Group 4, rank 2)
Increase the timeliness of successful resolution of child abuse cases through the family court by exploring and possibly implementing usage of specialized hearing officers.

Research was conducted on other states' usage of specialized hearing officers in lieu of family court judges to preside over certain child abuse and neglect proceedings. The search did not yield any favorable information or examples of usage that the Task Force wished to replicate or recommend. Also reviewed was past proposed SC legislation on the utilization of specialized hearing officers that did not progress. Based on these findings, the Task Force decided not to pursue this recommendation any further.

- **B.3. Court Coordination Protocol** (Group 4, rank 5)
Recommendation outcome: Successful implementation of the Court Coordination Protocol in two or more jurisdictions.

In 2009, SC Chief Justice Toal approved the use of a court coordination protocol in those child abuse and neglect cases where there are corresponding actions in Family Court and General Sessions Court so that they may be processed in a coordinated manner. This model administrative order/protocol was utilized in some model counties when it was first available but it has become unclear of the frequency and successfulness of its usage. An informal inquiry was made to county DSS offices about their usage of the protocol and the Task Force will be reviewing these responses in order to decide which jurisdictions to address.

- **B.4. Human trafficking of minors** (Group 1, rank 5 and Group 3, rank 6)
Recommendation outcome: Increase the identification of human trafficking of minors, also referred to as commercial sexual exploitation of children, to allow for increased prosecutions and services to victims.

In an effort to collect much needed data on the presence and prevalence of human trafficking in SC, the Children's Law Center has partnered with the SC Attorney General's Office and USC Department of Criminal Justice to administer a child sex trafficking data project. The project entails obtaining incident reports from a list of offenses over a two year period from target areas of South Carolina and identifying risk factors that suggest the presence of trafficking activity. A risk factor checklist and data program has been created. The number of incident reports requested was very large so we are working with the jurisdictions to help accommodate the request so that the project can move forward.

The Children's Law Center in conjunction with the Department of Social Services is adding a Human Trafficking training to its list of continually offered trainings to be presented to child welfare workers. In addition, a Law Enforcement Trainer will begin training law

enforcement across the state to identify victims of human trafficking and how to effectively respond to these cases. This lesson plan has been approved through the Criminal Justice Academy and scheduling will begin for these trainings in the next few months.

- **B.6. SC Network of Children’s Advocacy Centers (SCNCAC)**

Recommendation outcome: Support the Children’s Advocacy Centers in South Carolina by providing organizational capacity and infrastructural resources to SCNCAC.

The Task Force promotes growth of Children’s Advocacy Centers in South Carolina by supporting the South Carolina Network of Children’s Advocacy Centers, the accredited state chapter of the National Children’s Alliance. CJA funds are used in part to provide office space, equipment, supplies, and limited administrative support to the Network’s Director. The Network’s Director, an active participant on the Task Force, is appointed by the Network’s Board Chairperson.

Children’s Advocacy Centers (CACs) are endorsed by South Carolina law (S.C. Code § 63-11-310). The approach utilized by CACs is widely believed to significantly improve the investigative handling of child abuse cases. The assistance and support provided by the Task Force is having the desired results as CACs and their programs continue to progress. South Carolina’s 17 CACs served over 8,150 children in calendar year 2015. Currently, there are 15 CACs which are fully accredited through the National Children’s Alliance.

The South Carolina Attorney General, Silent Tears, and Children’s Trust of South Carolina partnered with the Network to sponsor the fifth annual Children’s Advocacy Center Day held on April 26, 2016 at the South Carolina State House. This annual event takes place in April to coincide with Child Abuse Prevention month. A press conference was held at the State House with Attorney General Alan Wilson, and representatives from children’s advocacy centers, partner agencies, key members from the General Assembly, and the Joint Citizens and Legislative Committee on Children were present. After the State House event, CAC staff received Legal Update training provided by the Children’s Law Center.

In July 2014, a three-year grant through the Duke Endowment was awarded to the National Children’s Alliance in collaboration with the SC Network of Children’s Advocacy Centers, Yale Child Study Center, and Children’s Advocacy Centers of North Carolina to implement the evidence-based treatment modality Child and Family Traumatic Stress Intervention (CFTSI) in the Carolinas. Five CACs in South Carolina and 3 CACs in North Carolina were selected to participate in this training. The second learning session for CFTSI with young children was conducted in Charlotte, NC on March 21-22, 2016.

In August 2015, the Network co-sponsored a two-day training with the Children’s Law Center on Multidisciplinary Team Response to Commercial Sexual Exploitation of Children. Mary Beth Nelson from the CAC in Atlanta, GA along with Rachael Garrett at the CAC in Charleston, SC and Charlie Benton from the Human Trafficking Unit at the Charleston Police Department presented on building a local response to child sex trafficking.

Every quarter, forensic interviewers at CACs are invited to participate in the Network's forensic interview peer review program. Interviewers come prepared with a recorded interview and show a segment on which they would like feedback and peer review. Participants view and provide feedback for each interview and then discuss how the interviewer could improve their performance. Prior to each session, SCNCAC sends out relevant research articles and literature to supplement the peer review process and keep interviewers abreast of recent research in their field. All articles and literature are discussed in each peer review session.

In November 2015, forensic interviewers participated in a statewide peer review learning session. A trainer/consultant, Linda Cordisco Steele, was contracted to present on interviewing preschool children and children with sexual behavior problems.

- **B.7. SC Children's Law Center**

Recommendation outcome: Successful delivery of coordinated and effective training and information for professionals involved in the response to child abuse allegations, investigations and prosecutions.

Task Force Recommendation B.7 calls for the operation of the Children's Law Center, a training and information resource center for professionals involved in child maltreatment proceedings. The Children's Law Center was established upon the recommendation of the Task Force and continues to function as its staff support and training arm. The University of South Carolina School of Law administers the Children's Law Center as a model program to enhance the knowledge and skills of all professionals involved in child abuse and neglect proceedings, leading to better outcomes for children. The mission and functions of the Children's Law Center reflect the CJA goals of improving investigative and judicial handling of child abuse and neglect cases and enhancing the effectiveness of court-appointed attorneys and guardians ad litem. The Children's Law Center is able to access other funding sources to complement CJA funds, thus providing a comprehensive array of services. The Children's Law Center offers a variety of training programs on child maltreatment to child protection caseworkers, family court staff, guardians ad litem, law enforcement officers, prosecutors, and other child-serving professionals. The Children's Law Center also trains professionals who are mandated by law to report suspected child abuse and neglect.

Annual conference and website: The annual Children's Law Conference was held on October 23, 2015. One hundred and seventy five professionals attended the conference in Columbia, SC. The conference theme was "Joining Hands to Create a Better System for Child Welfare and Juvenile Justice." Judge Maura Corrigan presented the morning keynote address and local presenters and Center staff provided a legal update. Participants selected from a variety of workshop topics including youth transitioning out of foster care, child victims of Human Trafficking, self-care for professionals, cyber-delinquency, domestic violence and children, and child fatalities. The conference closed with a very inspirational presentation by a former foster child. The Children's Law Center maintains a website containing online publications, training information, additional resources, and links to related organizations. The Children's Law Center also responds to individual requests for

information and technical assistance from professionals in the field. The website address is <http://childlaw.sc.edu>.

Resource materials: Children’s Law Center staff develop and distribute resource materials on child protection and prosecution of child abuse and neglect.

ChildFirst Training: CJA funds are used to assist with the delivery of ChildFirst, a comprehensive training program on forensic interviewing of children. This is an intensive five-day course in which students learn the necessary skills to conduct an investigative interview—also known as a forensic interview—of a suspected child abuse victim. This interactive course combines lectures and demonstrations supplemented with homework assignments and a written examination at the end of the course. Participants also must conduct a 30-minute interview of a professional actor playing the role of a sexually abused child after which the interviewer is critiqued by a professional forensic interviewer and a group of fellow students. End of course and follow-up evaluations, along with feedback from prosecutors, indicate this training is significantly improving the quality of forensic interviews. There were three ChildFirst trainings held during this reporting period, in May and October of 2015 and January of 2016, with 45 total students trained.

Emergency Protective Custody Training for 1st Responders: This newly offered course is presented by a Law Enforcement Trainer for law enforcement and social services investigators. EPC for 1st Responders provides students with an overview of the law in South Carolina allowing an EPC; the legal standard for seeking EPC based on imminent danger; best practices in coordination between law enforcement and DSS once an EPC is initiated, and the system in place to provide for the child once he or she has been removed from the residence. There were 17 EPC training sessions held during this reporting period, with the inception of the training starting in July of 2015. So far this year, 570 investigators have been trained in their communities with outstanding evaluation results.

C. Reform state laws, ordinances, regulations, protocols, or procedures to provide comprehensive protection for children, which may include those children involved in reports of child abuse or neglect with a potential combination of jurisdictions, such as intrastate, interstate, Federal-State, and State-Tribal, from child abuse and neglect, including child sexual abuse and exploitation, while ensuring fairness to all affected persons

- **C.2. Trauma informed screening (Group 2, rank 3)**
Recommendation outcome: All children and their families receiving services from SCSSS will have access to trauma specific evidence based treatment if needed.

The Children’s Law Center and the Department of Social Services have been working together on a DSS policy rewrite project. Task Force members have been actively involved with this through external stakeholder meetings and requests for feedback. Members have advocated for insertion of clear trauma screening/treatment protocols that are robust and evidence-based into agency policy. Discussions among many forums have taken place

regarding the best way to promote a culture change for adopting a trauma informed approach and practice. With support of these stakeholders, DSS is making efforts to include trauma screening into their intake process.

- **C.4. Release of medical information without parental consent (Group 3, Rank 5)**
Recommendation outcome: Increase the availability of medical information about children who are subjects of child abuse or neglect reports to SC Children's Advocacy Medical Response System providers.

The Task Force supported legislation that was enacted in June of 2015. The new law allows for certain medical professionals to perform medical examinations and release medical records without parental consent on children who are the subject of an abuse or neglect report. The law provides for better release and sharing of medical information. The office of SC Children's Advocacy Medical Response System prepared forms and a synopsis of the law for their network providers and to share with the healthcare providers through the SC chapter of the American Academy of Pediatrics. Although initial notification of the law change has been dispersed, there is still work to be done to obtain full compliance of this law.

- **C.5. Sexting legislation (Group 4, Rank 3)**
Recommendation outcome: Improve implementation of sexting laws to more appropriately address juvenile use of social media.

The Task Force has been monitoring a sexting bill that was introduced in January of 2015. Senate Bill 190 creates the offense of sexting for children under the age of 18 and provides a penalty. It also prohibits a child convicted of this offense to be placed on the sex offender registry and vests jurisdiction over the crime exclusively in municipal and magistrate courts.

- **C.6. South Carolina child abuse legislation**
Recommendation outcome: CJA Task Force will endorse legislation that will improve the state's response to abused and neglected children and child service professionals will be made aware of the passage of any applicable legislation during the CJA cycle.

The following SC bills of interest to the Task Force have been introduced and had movement during this year's legislative session. The Task Force will monitor these bills and continue to seek ways to support movement of applicable legislation:

S 986 Demand Side Human Trafficking: This bill increases misdemeanor penalties for prostitution and creates an affirmative defense to the charge of prostitution of being a victim of human trafficking. It also removes gender references in the statutory definition of prostitute and makes violation of this law a felony offense if the prostitute has a mental disability. Referred to House Judiciary 4/28/16.

S 1182 Local Child Fatality Review Teams and Coroners: This bill would require that the coroner of each county, within seven working days, to schedule a local Child Fatality Review Team to perform a review of a case where a child under the age of eighteen dies in the county he serves. The team may be comprised of the county coroner or his designee, a local law enforcement officer, an agent from the State Law Enforcement Division's Department of Child Fatalities, a board certified child abuse pediatrician or a forensic pathologist, a representative from the local county department of social services, and any other individual the coroner deems necessary. This bill would also disburse at least \$35,000 to each county to supplement coroner funding, with the potential of more highly populated counties receiving additional monies. Referred to House Judiciary 4/28/16.

H 4546 Normalcy and Foster Care Review Board: This legislation updates the Children's Code to match federal definitions and standards in several areas including "age or developmentally appropriate activities" and the "reasonable and prudent parent standard." It would also strengthen the functions and powers of local foster care review boards to conduct periodic reviews and to participate in permanency planning and abuse and neglect proceedings. Referred to Senate Judiciary 4/28/16.

H 4835 Supporting and Strengthening Families Act: This bill would allow parents to use power of attorney to delegate physical custody of a child to another adult for up to one year and provides a form for this purpose. The legislation specifies that this delegation may not be made while DSS is providing services or has an open investigation and that a background check must be conducted for the receiving adult and other adults in the placement home. Referred to Senate Judiciary 4/28/16.

H 3989 Persons with Disabilities Right to Parent Act: This bill requires DSS, law enforcement, family and probate courts, and other entities to address certain issues of disability in child custody, child protection and probate guardianship proceedings including inquiring about and documenting parents' disability status, ensuring that efforts to avoid removal include access to adaptive parenting equipment and training, that reasonable accommodations for parents with disabilities are made, and ensuring that decisions are not made solely on the basis of disability, among other requirements. Referred to Senate Judiciary 3/10/16.

H 5172 Safe Harbor for Exploited Minors Act: This bill would provide for the protection of the identity of victims of human trafficking who are under age 18. Under this act, if a court finds by a preponderance of the evidence that a minor engaged in prostitution under coercion or duress, the minor will be immune from prosecution. This bill allows a minor who violates certain other charges as a direct result of being a victim of sex trafficking to participate in a pretrial diversionary program and have the charges expunged. This bill requires law enforcement to contact DSS when a minor is charged with prostitution or being trafficked and clarifies that trafficking victims' residence in a shelter or facility is voluntary among other provisions. Referred to Senate Judiciary 4/28/16.

The following introduced bills did not meet the legislative crossover deadline to the next session and would have to be reintroduced:

H 3104 Safety Plans: This bill adds requirements to the implementation of safety plan when a child is removed from the home, limits its duration to ninety days, adds interview and home visit requirements, among other provisions.

S 189 Background Checks for Childcare Employees: This legislation adds unlawful conduct towards a child, cruelty to children, and child endangerment to the list of convictions that prohibit employment in childcare facilities and adds other instances in which childcare employment must be terminated.

S 150 SC Child Welfare Reform Act of 2015: This bill would abolish DSS and create Department of Family Protective Services. It would also transfer the public assistance functions of DSS to DHHS.

S 547 Mandated Reporters of Child Abuse & Neglect: This bill adds school or college administrators, coaches, firefighters, camp counselors, scout leaders, and any other person whose duties require direct contact or supervision of children to the list of persons who are required to report suspected child abuse or neglect when they receive such information that leads to this belief while in their professional or volunteer capacity. This bill also provides that a mandated reporter who reports child abuse or neglect to a supervisor or person in charge of an institution, school, facility or agency is not relieved of the individual duty to report under § 63-7-310.

H 3099 Mandated Reporters of Child Abuse & Neglect and Tort Claims Act Exceptions for Mandated Reporters: This bill, similar to S 547, adds certain persons to the statutory list of those required to report child abuse or neglect, but also for certain reporters eliminates the limitation of liability and immunity from suit under the Tort Claims Act of the governmental entity by which that person is employed.

S 190 Sexting: This bill creates the offense of sexting for children under age 18 and provides a penalty. It also prohibits a child convicted of this offense to be placed on the sex offender registry and vests jurisdiction over the crime exclusively to municipal and magistrate courts.

S 197 Training and Funding for Coroners: This bill would disburse funds from surcharges on copies of death certificates to county treasurers in an amount no less than \$35,000 to be used for coroner salary, hiring of a deputy coroner, administrative personnel or personnel with forensic training, an office, or office equipment. A Coroners Training Advisor Committee appointed by the Director of the SC Criminal Justice Academy shall assist in determining training requirements and govern qualifications for coroner, deputy coroner, and candidates for coroner and may recommend suspension, sanctions, or loss of funding for failure to perform official duties. Surcharges for initial copies of death certificates would increase \$5 for the initial copy and \$3 for each subsequent copy.

H 3866 Child Fatality Advisory Committee: This bill would revise the membership of the Committee to include the State Fire Marshall.

H 3160 Prescriptions for medications with certain ingredients: This bill requires anyone who wants to purchase ephedrine, pseudoephedrine and propanolamine from a pharmacy to first obtain a written prescription from a physician or another licensed person who has prescriptive authority. The bill has a fiscal impact statement estimating an annual expenditure increase in the General Fund of \$375,000.

S 265 Admissibility of Out-of-Court Statements: This bill adds an exception to the hearsay rule for employees and agents of Children’s Advocacy Centers in South Carolina related to out-of-court statements alleging abuse or neglect by a child.

IV. Prior Year Budget Expenditure

Cost Summary

Training for Coroners-	\$3000
<i>Trainers, facilities, materials, staff planning and collaboration time</i>	
Impact of trauma training-	\$2500
<i>CJA funded staff time for collaboration</i>	
Collaboration for Timely Processing of DSS Court Cases-	\$2500
<i>CJA funded staff time for collaboration</i>	
Training for clergy/faith leaders -	\$3500
<i>Staff preparation time, facility, materials</i>	
Drug Endangered Children Training-	\$3500
<i>Staff preparation time, facility, materials</i>	
Child Death Investigations Training and Collaboration-	\$3000
<i>Staff preparation time, facility, materials</i>	
MDT Training -	\$7500
<i>National Trainer, facilities, materials, travel, staff planning time</i>	
Abusive head trauma training-	\$2500
<i>Staff preparation time, facility, materials</i>	
Mandated reporter training-	\$2500
<i>Staff time, limited travel, training assistance</i>	

Child forensic interviews training and collaboration- \$2500
CJA funded staff time for collaboration

Human Trafficking of minors training and collaboration- \$3000
Staff preparation time, facility, materials, research fees

Support of the South Carolina Network of Children's Advocacy Centers- \$23,000
Office space, telephone, computer, office supplies, use of general office equipment, administrative support, staff time for collaborative events

Operation of the Children's Law Center- \$89,250
Personnel, project supplies, training, information and assistance related to CJA; training and information for law enforcement officers and prosecutors

Coordinating trauma-informed screening- \$2500
CJA funded staff time for collaboration

Direct Task Force Support- \$50,234
Meeting supplies, refreshments, printing, staff time for logistical support of the Task Force, support for committee meetings, mileage; Includes monitoring of children's legislation and other collaborations.

CJA Grantees Meeting- \$2,000
Travel for two CJA representatives to attend the federal grantees meeting

USC Facilities & Administrative Costs - \$52,775
Facilities, utilities, administrative overhead; Federal negotiated rate of 26% of modified total direct costs

Total Tentative Allocation **\$255,759**

V. Activities to Be Supported with CJA Funds

During the grant period, the Task Force will work toward accomplishing the current recommendations developed in April 2015. The Children's Law Center will assist the Task Force in its efforts. All of these objectives relate directly to specific recommendations of the Task Force.

A. Activities to improve the investigative, administrative, and judicial handling of cases of child abuse and neglect.

1. Training for Coroners: The Task Force, in conjunction with the Children's Law Center, will adopt and provide training for SC coroners. Training will address the adoption of a more uniform definition of child abuse and neglect as it relates to child deaths, identifying and reporting child deaths under the new uniform definition, and recognizing deaths caused by abuse and neglect and reporting appropriate cases to SLED. (Recommendation A.3.)

2. Impact of trauma training: The Task Force, in conjunction with the Children's Law Center, will adopt and provide training for law enforcement and family court judges on the impact of trauma on children who have experienced a traumatic event. The goal of this training is to create better informed decisions and practice. (Recommendation A.6.)

3. Timely Processing of DSS Court Cases:

The Task Force will review data and collaborate with the Court Improvement Program to identify reasons for continuances and seek out successful programs for possible replication. The Task Force will produce and distribute letters and/or waivers to be constructive progress towards this outcome. (Recommendation A.4.)

4. Training for clergy/faith leaders: The Task Force, in conjunction with the Children's Law Center, will adopt and provide training for clergy/faith leaders to increase adherence by clergy/faith leaders to mandated reporting requirements. Training will include identifying resources available to help children and families. The Task Force will track reporting by clergy/faith leaders to determine any change in reporting trends. (Recommendation A.8.)

5. Drug Endangered Children (DEC): The Task Force, in conjunction with the Children's Law Center, will adopt and provide training to increase knowledge regarding Drug Endangered Children (DEC) guidelines. Training will address all professional disciplines and will include an introductory overview of DEC guidelines, as well as more drug-specific trainings to address specific concerns of particular regions. (Recommendation A.9.)

6. Child death investigations: The Task Force, in conjunction with the Children's Law Center, will develop and implement a protocol for all child deaths to include the identification and responsibility of multidisciplinary agencies/professionals in that protocol. The Task Force will also provide training for all identified multidisciplinary disciplines in the defined response in child deaths, including death scene investigations, to improve the coordinated response. (Recommendation A.10.)

7. MDT Training: The Task Force will implement training for multidisciplinary teams and provide follow-up consultation in conjunction with Children's Advocacy Centers and the Children's Law Center. Training will seek to increase the coordination and collaboration between multidisciplinary teams in the comprehensive investigation of child abuse cases. (Recommendation A.11.)

8. Abusive head trauma training: The Task Force, in conjunction with the Children's Law Center, will adopt and provide training to coroners, law enforcement, SCDSS, and solicitors on the coordinated identification and legal response to cases involving abusive head trauma to children. Training will seek to increase the recognition of cases involving abusive head trauma and promote better documentation of crime-scene evidence in these investigations. (Recommendation A.12.)

9. Mandated reporter training: The Task Force, in conjunction with the Children's Law Center, will expand and adjust mandated training protocol and coordinate the delivery of that protocol to all mandated reporters of child abuse, especially the newest reporters added to the mandated reporter legislation. Training will seek to increase compliance with the mandated reporter requirements in South Carolina. (Recommendation A.13.)

10. Children and caregivers with disabilities: : The Task Force, in conjunction with the Children's Law Center, will develop and deliver high quality training and resources to identified stakeholders on the needs of children and caregivers with disabilities, as well as evaluate and provide recommendations to improve existing trainings and resources. Training will seek to improve the response and services to children with disabilities and caregivers with disabilities and increase the services that caregivers with disabilities need to support their ability to care for their children safely. (Recommendation A.14.)

B. Experimental, model, or demonstration of programs to improve the prompt and successful resolution of civil and criminal proceedings

1. Child forensic interviews: The Task Force, in conjunction with the Children's Law Center, will identify best practices regarding the use of forensic interviews in court proceedings and integrate the use of forensic interviews into best practices for prosecutors and trial advocacy training. The Task Force will develop and coordinate training of solicitors and forensic interviewers to increase the evidentiary use of forensic interviews in court proceedings. (Recommendation B.1.)

2. Human trafficking of minors: The Task Force, in conjunction with the Children's Law Center, will identify an assessment tool/checklist for child-serving professionals that includes red flags and assesses risk. The Task Force will also develop and provide training on recognizing these victims to law enforcement, SCDSS, Mental Health, educators, and health professionals. This training will be coordinated with Children's Advocacy Centers and multidisciplinary teams, and the goal will be to increase the identification of human trafficking of minors, also referred to as commercial sexual exploitation of children. (Recommendation B.4.)

3. Mentorship program for forensic interviewers: The Task Force, in conjunction with the Children's Law Center, will provide training to forensic interviewers in

CACs designed to increase adherence to the Child First SC forensic interviewing protocol. Using adherence data, forensic interviewers within the CAC Network will be identified to serve as mentors to other CAC forensic interviewers.

Trainings and the mentorship program will seek to improve adherence to the Child First SC forensic interviewing protocol within the peer review system and increase opportunities for support and development for forensic interviewers through a statewide mentorship program. (Recommendation B.5.)

4. Support the SC Network of Children's Advocacy Centers (SCNCAC): The CJA Task Force supports Children's Advocacy Centers and, together with the Children's Law Center, will assist their network, which is a state chapter of the National Children's Alliance. The Children's Law Center will continue to provide furnished office space for the Executive Director of the SC Network of Children's Advocacy Centers along with telephone, computer, office supplies, and use of equipment and meeting rooms. Additionally, the Children's Law Center will provide administrative support and will co-sponsor SCNCAC training events. The Executive Director of the Network is a member of the Task Force and will report regularly on the status and needs of the state's Children's Advocacy Centers. The Children's Law Center will also assist individual Children's Advocacy Centers by providing legal information and training as requested. This support will promote the expansion of the Children's Advocacy Center approach throughout the state. (Recommendation B.6.)

5. Operation of the SC Children's Law Center: DSS contracts with the Children's Law Center to support the functions of the Task Force and to operate a training and information resource center for professionals involved in child maltreatment proceedings. The Children's Law Center is responsible for implementing the training recommendations in collaboration with the Task Force, preparing resource materials as directed by the Task Force, and assisting with accomplishment of policy recommendations. The Children's Law Center provides research and logistical support for all meetings of the Task Force and its committees. Supporting the operation of the SC Children's Law Center promotes successful delivery of coordinated and effective training and information for professionals involved in the response to child abuse allegations, investigations, and prosecutions. Measurable outcome goals of training will be identified and tracked to assess and modify any trainings. (Recommendation B.7.)

C. Reform of state laws, ordinances, regulations, protocols, or procedures to protect children from abuse.

1. Sexting legislation: the Task Force will collaborate with other child abuse professionals on the issue of sexting in an effort to have our laws more appropriately address the juvenile use of social media. Included in this collaboration will be a jointly hosted training on this issue to educate and to further explore issues relating to current pending legislation. (Recommendation C.5.)

2. Coordinating Trauma-informed screening: The Task Force will collaborate with SCDSS and other agencies to ensure that all children and their families receiving services from SCDSS will have access to trauma-specific evidence-based treatment if needed. The Task Force will support efforts of SCDSS to include a trauma screening in their intake process. (Recommendation C.2.)

3. Child abuse reported from the school system: The Task Force will collaborate with school administrators/educators to identify current practices and procedures in addressing and reporting suspected child abuse and neglect. Barriers to adherence/compliance with the mandated reporting laws will be identified and addressed. A collaborative training will be developed to support compliance with mandated reporting requirements to increase the identification of children who need protection and treatment. Trainings will seek to increase the number of reports of child abuse and neglect to the mandated investigative agency when those reports are received from within the school system. (Recommendation C.7.)

D. Projected Cost Summary

Training for Coroners- \$3,000
Trainers, facilities, materials, staff planning and collaboration time

Impact of trauma training- \$2,500
CJA funded staff time for collaboration

Collaboration for Timely Processing of DSS Court Cases- \$2,500
CJA funded staff time for collaboration

Training for clergy/faith leaders - \$2,500
Staff preparation time, facility, materials

Drug Endangered Children Training- \$3,500
Staff preparation time, facility, materials

Child Death Investigations Training and Collaboration- \$3,000
Staff preparation time, facility, materials

MDT Training - \$5,000
National Trainer, facilities, materials, travel, staff planning time

Abusive head trauma training- \$2,500
Staff preparation time, facility, materials

Mandated reporter training- \$2,500
Staff time, limited travel, training assistance

Child forensic interviews training and collaboration- \$2,500
CJA funded staff time for collaboration

Human Trafficking of minors training and collaboration- \$3000
Staff preparation time, facility, materials, research fees

Mentorship program for forensic interviewers - \$2,500
CJA funded staff time for collaboration

Children and caregivers with disabilities training and collaboration - \$2,500
CJA funded staff time for collaboration

Child abuse reported from the school system- \$2,000
Staff collaboration, preparation time, facility, materials

Sexting legislation - \$2,000
Staff collaboration, research, meetings/trainings

Support of the South Carolina Network of Children's Advocacy Centers- \$20,000
Office space, telephone, computer, office supplies, use of general office equipment, administrative support, staff time for collaborative events

Operation of the Children's Law Center- \$86,250
Personnel, project supplies, training, information and assistance related to CJA; training and information for law enforcement officers and prosecutors

Coordinating trauma-informed screening- \$2,500
CJA funded staff time for collaboration

Direct Task Force Support- \$48,691
Meeting supplies, refreshments, printing, staff time for logistical support of the Task Force, support for committee meetings, mileage; Includes monitoring of children's legislation and other collaborations.

CJA Grantees Meeting- \$4,000
Travel for two/three CJA representatives to attend the federal grantees meeting

USC Facilities & Administrative Costs - \$52,775
Facilities, utilities, administrative overhead; Federal negotiated rate of 26% of modified total direct costs

Total Tentative Allocation

\$256,716