At Issue: Child Abuse Reporters and the Immunity Myth

Franne Sippel, EdD
Nancy Guardia, MSW

For decades legal experts and academics have reassured professionals required to report child abuse that they are protected from legal and financial harm when reporting suspected abuse or neglect. They have been told that as long as their reports are made in good faith, strong immunity laws will shield them from both criminal and civil liability.

"The good news is that in the United States, teachers are protected from litigation in situations where they report suspicions of child abuse, as long as they follow the requirements specific to their district and state. So breathe a sigh of relief, as chances are your worst fear will never come true. . . ," stated Dr. Matthew Lynch (2012).

But, such reassurances ring hollow for those who have performed their duty to protect vulnerable children and then experienced severe retaliation. Mandatory reporters who comply with the law subsequently have been fired, threatened, demoted, harassed, sued civilly, criminally charged, faced with professional board or ethics complaints, and had their identity released to the alleged perpetrator and made public.

Despite the myth that it is safe to "speak up for kids," nothing prevents alleged perpetrators of abuse from bringing a civil lawsuit against a child abuse reporter. All they need is an attorney willing to take their case.

In the field of employment law, no government oversight or complaint process is available when an employer retaliates by firing or disciplining an employee for reporting child abuse. This is the legal equivalent of having federal and state laws governing unfair work practices with no state labor board to investigate and enforce these laws.

Thus, child abuse reporters' only recourse is to sue their employer, a process that can have overwhelming financial and professional repercussions. Further, appellate courts frequently uphold an employer's right to dismiss an employee "at will" and decline to extend "the public policy exception" for mandatory reporting (Paget, n.d.).

Employers' rights have also superseded children's safety in the infamous practice of "passing the trash," which has been documented in investigations of pedophiles in the Catholic Church and in New England private schools. In numerous instances, adults who supported the child victims then experienced disciplinary actions by their employers, such as demotion and termination (Harris, 2017).

Carolyn Trost, in her 1998 article "Chilling Child Abuse Reporting: Rethinking the CAPTA Amendments," expressed grave concern that the United States was undergoing a policy shift toward "legislation that favors parental interests over children's interests." Trost predicted the 1996 Amendments to CAPTA with their "higher immunity threshold and ambivalence toward

promoting (child abuse) reporting will ultimately increase litigation, and thus the cost of good faith child abuse reporting, and increase liability for erroneously reporting child abuse (p. 189)."

Trost (1998) discussed the fact that most reporting laws place the degree of suspicion required for reporting at a very low level to encourage reporting and protect as many children as possible. "Establishing a low level of suspicion necessarily assumes [that] enduring some erroneous reports is the price for detecting as much abuse as possible (p. 207)."

Trost (1998) also addressed the misconception that many child abuse reporters act with malice. Her research revealed a negligible number of court cases in which a credible claim of malice had been made. Furthermore, most states' laws have severe penalties for mandated reporters who knowingly file a false report—including sanction or loss of one's professional license.

Trost (1998) noted significant deterrents to reporting by mandated professionals existed before the 1996 Amendments, and that underreporting is widely recognized as a problem, hampering detection of abuse and efforts to protect children. She predicted that "increased litigation and decreased immunity will likely have a serious chilling effect on child abuse reporting (p. 214)."

Although malpractice lawsuits against psychologists have remained stable over the past two decades, licensure board complaints have increased dramatically. "Unfortunately, even a letter of reprimand, the lowest form of disciplinary action from a licensing board, can have serious consequences. It may result in the removal of the psychologist from a managed care panel or the loss of hospital privileges (Youngren, Vandecreek, Knapp, Harris, & Martin, 2013, p. 20)."

Board complaints against licensed professionals for their child protection work fall under administrative law. State licensing board members are political appointees. There is no federal or state government oversight of licensing board actions taken against child abuse reporters, and licensing boards are frequently a branch of a state's Office of Consumer Affairs. Therefore, state government attorneys who prosecute licensing board actions may consider their primary duty to be to the adult complainant, rather than the child victim.

Licensing board attorneys focus on whether licensing law and its regulations were violated; they do not focus on assessing whether or not the client actually suffered harm from a mandatory child abuse or neglect report. Since a licensing board action is an administrative, rather than a criminal, procedure, reporters (i.e., psychologists or social workers) are not granted the same due process rights and must hire their own legal representation. Child abuse reporters can also be denied coverage for board complaints by their employer's professional liability insurance. In addition, standards for admissible evidence are less stringent, hearsay evidence is allowed, and the standard of proof is substantially lower (Youngren et al., 2013).

Fathers' rights groups may go after professionals who work to protect children as well. Too often these groups find ways to intimidate licensure boards or file multiple complaints against good professionals. This is called "targeting," and the authors report it has resulted in fewer mental health professionals willing to evaluate and protect abused children, especially during divorce proceedings (Kleinman & Pollack, 2017).

The misuse of confidentiality protections under the Health Insurance Portability and Accountability Act (HIPAA) may be a factor to consider when interpreting data regarding retaliation, since this is the basis for numerous board complaints filed by a caregiver *after* the mandated reporter filed a child abuse report against the caregiver. In one study, 9.7% of the complaints against the psychologists were for an alleged breach of confidentiality (Montgomery, Cupit, & Wimberley, 1999).

Kirkland and Kirkland's (2001) study based on data collected from 34 states and provinces found an "astounding" number of licensing board complaints against psychologists performing child custody evaluations. The study noted a "low threshold for filing formal complaints" (p. 172). Complaints can easily be filed online, eliminating attorney fees. Most practitioners describe a board complaint as a "thoroughly harrowing experience even if the complaint is patently vengeful or frivolous" (p. 173). The study also

noted that although most disciplinary actions are not severe, the fact that a professional has been disciplined at all follows the practitioner for the remainder of one's career. Child custody decisions were rated among the most likely activities to cause both board complaints and malpractice suits.

In a study entitled "Complaints, Malpractice, and Risk Management: Professional Issues and Personal Experiences," 284 licensed psychologists were sampled (Montgomery et al., 1999). In the study, 71.5% reported that they knew a colleague who had a state licensure board complaint filed against them, 41% reported being threatened with a complaint, and 39% of those reported that the threat resulted in a complaint. The study also noted that 38.7% knew a colleague who had been sued for malpractice, and 6% had been sued themselves for malpractice. Out of the sample that had complaints filed against them (N=31), 9.7% were due to retaliation by the complainant.

Despite such studies demonstrating retaliation as a legitimate threat, child abuse reporters are routinely told they are absolutely safe making a report as long as the allegation of maltreatment is made in good faith. This widely believed myth of immunity says cases of retaliation are exceedingly rare and implies that the mandated reporter must have done something wrong to suffer serious negative consequences for simply helping a child. This belief appears to be based upon the mere existence of state immunity laws meant to protect mandatory reporters, rather than on a body of research supporting the actual efficacy of such laws.

For instance, Douglas Besharov (1994) stated unequivocally, "As long as persons who report are arguably acting in good faith, they face no liability for reporting, no matter how weak the evidence or reasons for doing so" (p. 145).

In his article "Disclosing Confidential Information," Stephen Behnke (2014) reviewed the California penal code: "No mandated reporter shall be civilly or criminally liable for any report required or authorized by this article, and this immunity shall apply even if the MR acquired the knowledge of reasonable suspicion of child abuse or neglect outside of his/her professional capacity or outside the scope of his/her employment" (p. 44). Behnke (2014) concluded that such a broad clause in the state's law offers "a high degree of protection to a psychologist who discloses confidential information pursuant to a child abuse reporting statute" (p. 44).

Yet, several recent Amicus briefs written in support of mandated reporters who were retaliated against after they reported child abuse—a doctor, a school administrator, a social worker, and a psychologist (*Jones v. Wang, Schott v. Wenk, Piro v. McKeever,* and *Kleinman v. New Jersey Board of Psychological Examiners*)—demonstrate that legal retaliation and board complaints are indeed serious issues facing child abuse reporters (for details, see Jones, Jones, & G. J. v. Wang, 2015, Schott v. Wenk, 2015, Piro v. McKeever, Sapp, Barry, & Davidson Counseling Associates, 2016).

In addition, the Child Abuse Prevention and Treatment Act's (CAPTA) (1978) *Report to Congress on Immunity From Prosecution for Professional Consultation in Suspected and Known Instances of Child Abuse and Neglect* (U.S. Department of Health and Human Services [USDHHS], 2013) determined "immunity from prosecution is a critically important issue facing professionals involved with responding to an investigating child abuse and neglect" (p. 3).

Included in the 2013 *Report to Congress* (USDHHS) were the results of a study of 544 mandatory reporters, mostly pediatricians, which found that 11% faced lawsuits (6% in state court and 5% in federal court) after filing an abuse report or providing professional consultation. This study measured only one type of retaliation, civil lawsuits, initiated by the alleged perpetrators against the mandatory reporter. The negative consequences from such litigation were reportedly "dire."

In the 2015 study "Factors That Influence Child Abuse Reporting: A Survey of Child-Serving Professionals," authors Walsh and Jones conducted an online survey of 556 child-serving professionals. Although their survey did not specifically address retaliation, survey participants were asked about the relevance of 12 factors that could possibly hinder decisions to report suspected abuse. Thirty-nine percent cited fear of making an inaccurate report, 35% cited unclear statutory laws, and 31% said fear of legal ramification for accusations that

proved false were factors that could negatively impact their decision to report suspected abuse.

Authors Rannah Gray and Jim Kitchens completed an unpublished national online survey in April 2017 to determine barriers to reporting child sexual abuse. Ms. Gray became interested in the subject when she learned during talks with groups, including mandatory reporters, that they were often discouraged by their supervisors and employers from reporting suspected child abuse (Kitchens & Gray, 2017).

The survey sample consisted of 600 adults. Among the notable findings, 49% said they worry about an accused abuser suing them for reporting, and 55% over age 65 cited this as a concern as well, indicating a significant deterrent for abuse reporting. A total of 59% feared the accused might retaliate against them (pose a safety threat), and 70% of ages 18–34 and 69% over age 65 specifically worried this retaliation might involve physical violence. Over all age groups, 36% worried about their reputation being harmed for reporting child sexual abuse, with 44% of the respondents in the 18–34 age range being the most concerned (Kitchens & Gray, 2017).

Other studies demonstrate that fear of litigation or having been previously sued decreases the likelihood of reporting child abuse (Flaherty et al., 2006; Gunn, Hickson, & Cooper, 2005; Lazenbatt & Freeman, 2006).

A 2011 study by Barlow sampled 1,223 nurse practitioners and nurse midwives. Survey participants were asked to list reasons why a healthcare provider might decide not to report suspected child abuse. One significant perceived barrier to reporting child abuse was a fear that reporting might harm the provider personally, professionally, or legally.

One co-author of this article, Franne Sippel, and her colleagues Karyl Meister, Ahmet Can, and Theresa Esser, are conducting a study, entitled "Mandatory Reporting and the Retaliation Factor," in conjunction with Northern State University in Aberdeen, South Dakota (2018). Their study modifies and expands CAPTA's 2013 *Report to Congress* to include a broader sample of mandatory reporters, measures multiple forms of retaliation, and explores how retaliation and fear of retaliation may or may not impact child abuse reporting behaviors. To date, 566 mandatory reporters have responded and 23% say they have experienced some form of retaliation *after* reporting child abuse or neglect (Sippel et al., 2018).

Dr. Sippel has contacted a number of professional liability companies, including the Trust, HPSO, NASW Assurance Services, and PIAA, regarding claims against professionals filed by alleged perpetrators of child maltreatment. The information from their representatives and information available on their websites does not indicate that these companies consider retaliation as a separate risk management category. Consequently, their risk management training for mandatory reporters does not address the specific risks associated with reporting child maltreatment. Therefore, mandatory reporters are not being made aware of the possibility of retaliation or being advised on best practices to protect themselves from legal retribution.

For example, the Trust insurance company's advertisement for risk management training states the following: "For the last ten years, there has been a major increase in the number of lawsuits, licensing board complaints, and ethics committee complaints against clinical psychologists (Harris, 2014)." Yet, the Trust does not note what percentages of these adverse actions are related to custody and child protection issues.

The professional liability company for social workers notes that a client or even a third party can sue a mandatory reporter without a legitimate reason. "Social work is a rewarding career that demands personal commitment. But helping others can put you at risk of being sued by someone dissatisfied with an outcome. You need professional liability coverage. Social workers need protection from frivolous lawsuits and from legal action due to negligent acts, errors, and omissions that can arise from their practices. These lawsuits may even arise years later, after the alleged event took place. Without insurance, you could spend precious time and resources defending yourself, regardless of whether there is any merit to the claim" (NASW Assurance Services, Inc., 2018).

Thus, professional liability companies promote the

necessity of liability insurance against malicious complaints and lawsuits while overlooking retaliation as a serious risk factor for the child abuse reporters who purchase this insurance.

Popular culture also promotes the belief that reporting suspected child abuse is an easy obligation with no personal liability for the reporter. Politicians routinely urge the public to stop the silence about child abuse by simply "speaking up" to protect children from harm.

Following Jerry Sandusky's indictment for decades of child sexual abuse, which went unreported by Penn State's top administrators, many states passed legislation to expand and strengthen mandatory reporting laws. The majority of these laws focused on increasing the pool of mandated reporters, increasing training requirements for child welfare professionals, and increasing civil and criminal penalties for professionals who fail to report.

Retaliation for child abuse reporting was addressed only by some statutes that forbid employers from discriminating against mandatory reporters. Unfortunately, none of these laws made any provisions for investigating instances of retaliation by employers or for enforcing penalties for an employer's illegal actions.

Furthermore, the media often contribute to public misconceptions about mandatory reporting by confusing the role of professionals, who have a legal duty to report suspected child abuse, with the role of the states' child protective services (CPS) workers, who investigate and act on these reports. Thus, relatively rare cases in which good parents lose custody may be attributed to overzealous child abuse reporting. In reality, the determination of whether or not child abuse occurred is made by child protection services (CPS)—not the child abuse reporter. The decision to remove a child from a parental home is made by a court of law—not the mandated reporter. Journalists may equate the debate about reporting parents who allow their children to play unattended with the far more consequential debate about reporting parents of infants born addicted to opiates (Goldberg, 2015).

Richard Wexler is one example of a journalist whose extremist family preservation argument has been widely quoted in national newspapers such as the *New York Times*, the *Washington Post*, the *Los Angeles Times*, and *USA Today*. He has been interviewed on NPR, ABC, CBS, and NBC. (While Josh Powell was still being investigated for his wife's murder, Wexler said the "least bad option" would be for the courts to allow Powell's two young sons to remain in his custody—3 days later, the children were dead.). Wexler is the director of the one-man National Coalition for Child Protection Reform and claims to be an advocate for children despite a lack of training or credentials. Wexler has testified as a "child welfare expert" before the U.S. Senate and U.S. House of Representatives in opposition to laws to expand child abuse reporting.

In response to an op-ed piece by Dr. Sippel (2016) in the *Chronicle of Social Change*, Wexler (2017) alleged that mandatory reporters are arguing for less accountability in reporting.

> [Child abuse reporters] already have protections from lawsuits that are so strong that they have to not only violate the law but [also] have good reason to know they're doing it, or be acting maliciously, before a jury can even consider what they've done to an innocent family. The 2013 HHS report to Congress passes on recommendations from mandated reporters…. Surprise! They want even less accountability…. [T]he extremism of some seeking to avoid accountability knows no bounds. Pity the poor oppressed mandated reporter." (p. 2)

In her response to Wexler, Nancy Guardia (2017), MSW and co-author of this article, countered by noting that no government entity prevents an alleged child abuser from suing a mandatory reporter. She also noted that no state ensures any enforcement of immunity protection contained in state laws. Guardia further argued that mandated reporters do not want child abuse reporting laws strengthened "to avoid accountability." Rather, they are advocating for "enforced and expanded protections for those already serving as child abuse reporters (p. 2)."

It is neither logical nor ethical for our society to continue perpetuating the myth that the current laws on immunity from liability provide sufficient protection for child abuse reporters. *Instances of legal and other forms*

of retaliation are occurring, but they are rarely studied; furthermore, no private or government agency is measuring the extent of the problem. The chilling effect of retaliation on child abuse reporting already exists but is simply not addressed.

Ironically, the belief that mandatory reporters are without risk is actually placing them at increased risk. Too often mandatory reporters face a Hobson's choice, by which they can suffer dire professional and personal consequences for reporting, as well as for not reporting, the suspected or known abuse of a child. Child abuse reporters are not told the laws meant to protect them are unenforced and may help only after the damage has been done (i.e., after a lawsuit has been filed), or that immunity laws do not protect them from damaging professional ethics or board complaints. Denying that reporting child abuse can put mandatory reporters in serious jeopardy thus fails to prepare them for the unfortunate reality they may face.

In conclusion, child welfare legal experts and academics need to raise awareness that our present laws fail to provide adequate immunity for frontline child abuse reporters. CAPTA should be amended to make explicitly clear that those professionals mandated to report suspected child abuse or neglect are immune from the following: (1) criminal liability, (2) civil liability, and (3) complaints against their professional license. CAPTA should clarify that child abuse reporters are immune from liability under federal law.

Individual statutes must also be strengthened by clarifying the reporting process. We need to differentiate abuse and neglect reports made by a child's teacher, physician, therapist, and other legally mandated reporters from those made by the general public. This would help CPS prioritize reports and acknowledge that child abuse reporters are assisting the government's interest in protecting children.

State whistleblower laws, and an ombudsman for mandated reporters, could monitor the enforcement of statutory protections from liability.

Finally, all state legislatures should amend their laws to incorporate the recommendations from CAPTA's 2013 *Report to Congress* (USDHHS), which concludes that

> Virtually every aspect of investigations into child abuse or neglect cases calls for independent professional judgments and decision making that could be legally protected, as long as those actions are taken in good faith.… By providing these protections, professionals who work on those important cases could carry on their work … with less fear of liability for providing assistance to vulnerable children. (p. 21)

About the Authors

***Franne Sippel, EdD**, a licensed psychologist, belongs to the National Association of Certified Mediators and the American Psychological Association. A practitioner for over 25 years, she serves as an expert on APSAC's Center for Child Policy, focusing on Maltreatment Reporting Laws. Corresponding contact: 605-397-7949, franne23@nvc.net.*

***Nancy Guardia, MSW**, a clinical social worker and member of NASW, has provided therapy to individuals and families for over twenty years. She has done extensive research on the effective practices for reporting child abuse and neglect, and serves as an expert on APSAC's Maltreatment Reporting Laws Committee. Contact: 845-687-6481, nlguardia@gmail.com*

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