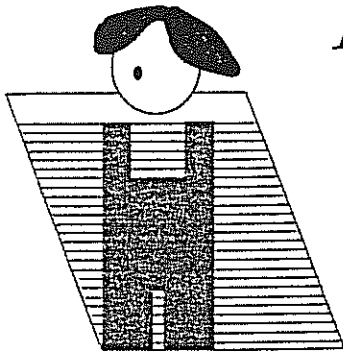


teacher • instructional aide • teacher's aide • teacher's assistant • classified public school employee • administrative officer • supervisor of child welfare • certificated pupil personnel employee • administrator or employee of a public or private youth center, youth recreation program, or youth organization • day care owner or employee • headstart teacher • public assistance worker • employee of a child care institution • foster parents • group home personnel • personnel of residential care facilities • social

## Reporting Child Abuse:

### A Personal Responsibility



## Reference Handbook

worker • peace officer • physician • surgeon • psychiatrist • psychologist • dentist • resident • intern • podiatrist • chiropractor • probation officer • parole officer • employee of a school district police or security department • district attorney investigator • inspector • family support officer • peace officer • physician • surgeon • psychiatrist • psychologist • dentist • resident • intern • podiatrist • chiropractor • nurse • dental hygienist • optometrist • marriage, family, child counselor or trainee • emergency medical technician • paramedic • state or county public health employee • coroner • medical examiner or any other person who performs autopsies • religious practitioner who diagnoses, examines, or treats children • employee of a police or sheriff's department, county probation department, or county welfare department • commercial film and photographic print processor • animal control officer • humane society officer • firefighter

## Who is a mandated reporter?

Just about anyone who interacts with children in a professional capacity is a mandated reporter. According to State Penal Code 11166, mandated reporters include, but are not limited to: healthcare professionals, teachers and school administrators, fire fighters and public safety officers, day care workers, recreational camp leaders, and animal control officers.

## What is the responsibility of a mandated reporter?

Mandated reporters must report known or suspected child abuse to the appropriate authorities immediately by phone and follow-up with a written report to the same agency within thirty-six hours.

Your place of work may have designated an administrator who actually makes reports. Even if there is an administrator, it is still the mandated reporter's ultimate responsibility to make sure a report was submitted.

Employers can not prevent you from making a report.

## Where should a mandated reporter report suspected child abuse?

Suspected child abuse reports can be made to the child protective services department of your county's social services agency. Reports can also be made to your local police or sheriff department.

## Does the law protect mandated reporters?

The law provides mandated reporters with immunity from civil and criminal penalties for making reports required of them under the law.

## What are the penalties for not reporting?

Penalties for not reporting include a fine of up to \$1000 and up to six months in county jail as well as potential civil damages.

# Types of Abuse

## Physical Abuse.

Physical Abuse is any act which results in the non-accidental physical injury of a child. Inflicted physical injury occurs because of unreasonably severe corporal punishment or unjustifiable punishment.

Physical indicators include:

- ✓ Damage to the skin such as bruises, burns, human bite marks, abrasions, and scars.
- ✓ Damage to internal organs or skeleton including the brain.
- ✓ Location of injury. Abuse is usually visible on the back of a child's body from the neck to the knees, but typically not on shins, elbows, or knees.

Behavioral indicators include:

- ✓ Parent/caretaker delays or neglects seeking care for a child.
- ✓ Child is excessively passive, compliant or fearful—or excessively aggressive or violent.
- ✓ Child/parent/caretaker attempts to hide injuries or the child is wearing cloths inappropriate for the weather.

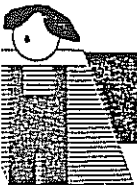
## Neglect.

Neglect is the negligent treatment or mistreatment of a child. The state defines two types of neglect.

“Severe neglect” means the negligent failure of a parent or caretaker to protect the child from severe malnutrition or medically diagnosed, non-organic failure to thrive.

“General neglect” means the negligent failure of a parent or caretaker to provide adequate food, clothing, shelter, medical care or supervision when no physical injury to the child has occurred.

*Note: This list is intended to provide a general overview of the major types of abuse. For more information, contact your training manager or public library.*



# Types of Abuse

Indicators of neglect include:

- ✓ The child lacks adequate medical or dental care.
- ✓ The child is dirty, demonstrates poor personal hygiene or is inadequately dressed for weather conditions, or is always sleepy or hungry.
- ✓ The home is unsafe, unsanitary, or lacks heating or plumbing.

## Sexual Abuse.

Sexual Abuse is any activity sought to attain sexual gratification in the presence of a child. There are a number of possible indicators of sexual abuse that, taken separately, may not be signs of abuse. The list below should be considered within the context of other behaviors and the overall situation.

Indicators includes:

- ✓ The child discloses directly or indirectly that sexual abuse has occurred.
- ✓ The child has a sexually transmitted disease.
- ✓ Genital discharge or infection.
- ✓ Physical trauma or irritation to the anal/genital area.
- ✓ Age-inappropriate understanding of sexual behavior.
- ✓ Excessive sexualized behavior.

## Emotional Maltreatment/Abuse.

Parents can inflict emotional abuse on their children by excessively verbally assaulting them which include belittling, screaming, and threatening as well as sarcasm, unpredictable responses or inconsistent behavior.

Indicators include:

- ✓ The child is withdrawn, depressed or apathetic. Or the child is extremely aggressive and maybe considered a behavior problem.
- ✓ The child is overly rigid in following instructions of teachers or other adults.
- ✓ The child displays signs of emotional turmoil including repetitive rhythmic movements.



# Action Plan

## Mandated Reporting A Personal Responsibility

If you suspect child abuse, you should....

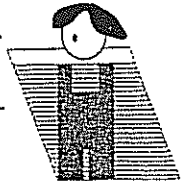
1. Prepare the following information:

- ✓ Your name
- ✓ Your work address
- ✓ Name and present location of child
- ✓ Nature and extent of the suspected abuse--physical, sexual, emotional abuse or neglect
- ✓ Family address
- ✓ Parents' and/or caretakers' names
- ✓ Names, ages, and schools of siblings
- ✓ Language and ethnicity of the family

2. Call your county's child protective services at \_\_\_\_\_.

3. Within 36 hours, complete and mail Department of Justice Child Abuse Report Form (11166 form) to:

Atten. \_\_\_\_\_  
Agency \_\_\_\_\_  
Address \_\_\_\_\_  
City, State, Zip \_\_\_\_\_



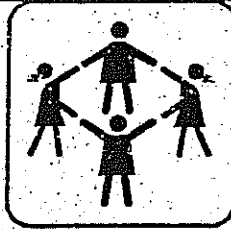
# Guidelines for Mandated Reporters

## California Child Abuse Reporting Law (P.C. 11165)

### *What are you legally mandated to Report?*

You are required to report child abuse in the home or in out-of-home care. The abuse may consist of:

- ◆ physical abuse
- ◆ severe or general neglect
- ◆ unjustifiable mental suffering
- ◆ willful cruelty or unjustifiable punishment of a child
- ◆ sexual abuse
- ◆ sexual exploitation



### *Criteria for reporting*

- ◆ observation
- ◆ reasonable suspicion
- ◆ knowledge of abuse

### *Why do you report?*

Child abuse tends to escalate in frequency and severity. You are required to report:

- ◆ to protect the child
- ◆ to comply with the law
- ◆ to get help for the family

### *Who reports?*

Most professionals who, in the course of their work, come in contact with families and children, including medical and non-medical practitioners, day care providers, group home staff, probation officers, teachers, and social workers.

Commercial film and photographic film processors, firemen, dog catchers, and District Attorney Investigators must also report. All other persons may report suspected child abuse. This can be done anonymously, but mandated reporters must disclose their names.

### *To whom?*

A report must be made to a "child protective agency" which means the Department of Family and Children's Services or the local police agency. All reports, except neglect, are cross-reported to other child protective agencies.

### *When?*

A phone report must be made immediately upon suspicion or knowledge. A written report is required within 36 hours.

Child Abuse Reporting forms are available from the Department of Family And Children's Services by calling 441-5383.

### *Confidentiality*

The report is confidential and the name of the reporter is confidential. Mandated reporters, however, who foresee a future relationship with a client are encouraged to advise the caretaker of the report to prevent future problems in the relationship.

### *Liability*

The confidentiality privilege of the mandated reporter is superseded by the statutory duty to report. Mandated reporters can be held subject to civil or criminal sanctions for failing to report suspected child abuse, especially if the child is subsequently hurt. A mandated reporter can be fined a maximum of \$1,000 or six months in jail for failure to report. A supervisor of a mandated reporter is liable if he or she interferes with the reporting.

### *Immunity*

Legally mandated reporters have immunity. Citizens making reports also have immunity unless it can be proven the reports were false or malicious. A State fund provides reimbursement for legal fees up to \$50,000 if a mandated reporter is sued.

### *Feedback to reporter*

The child protective agency is required to provide the mandated reporter with information regarding the disposition of the case.

### *Abuse in the past*

Reports of abuse must be made at the time the mandated reporter learns of the abuse. There is no statute of limitations in the reporting law. Most states, however, have differing statutes of limitations regarding prosecution of abuse. If the victim is 18 or over, the child protective authorities will usually refer to police for possible criminal charges. Cases of adults 18 or over must be reported to child protective agencies if there are known potential victims (e.g., siblings).

### *Compliance with the Reporting Law*

Any new employee of an agency who is legally mandated to report must sign a form stating knowledge of the reporting requirements and willingness to comply with the law.

### *To Report - Call:*

San Jose Area  
299-2071

Gilroy/Morgan Hill Area  
683-0601

Palo Alto Area  
493-1186

# SUSPECTED CHILD ABUSE REPORT

To Be Completed by Mandated Child Abuse Reporters  
Pursuant to Penal Code Section 11166

CASE NAME: \_\_\_\_\_

PLEASE PRINT OR TYPE

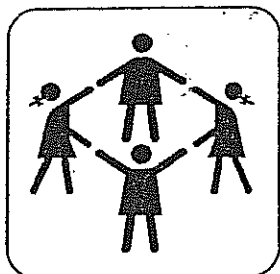
CASE NUMBER: \_\_\_\_\_

<b>A. REPORTING PARTY</b>	NAME OF MANDATED REPORTER		TITLE		MANDATED REPORTER CATEGORY					
	REPORTER'S BUSINESS/AGENCY NAME AND ADDRESS			Street	City	Zip	DID MANDATED REPORTER WITNESS THE INCIDENT? <input type="checkbox"/> YES <input type="checkbox"/> NO			
	REPORTER'S TELEPHONE (DAYTIME) ( )		SIGNATURE		TODAY'S DATE					
<b>B. REPORT NOTIFICATION</b>	<input type="checkbox"/> LAW ENFORCEMENT <input type="checkbox"/> COUNTY PROBATION		AGENCY							
	<input type="checkbox"/> COUNTY WELFARE / CPS (Child Protective Services)									
	ADDRESS		Street	City	Zip	DATE/TIME OF PHONE CALL				
OFFICIAL CONTACTED - TITLE					TELEPHONE ( )					
<b>C. VICTIM</b> <small>One report per victim</small>	NAME (LAST, FIRST, MIDDLE)				BIRTHDATE OR APPROX. AGE	SEX	ETHNICITY			
	ADDRESS		Street	City	Zip	TELEPHONE ( )				
	PRESENT LOCATION OF VICTIM			SCHOOL	CLASS	GRADE				
	PHYSICALLY DISABLED? <input type="checkbox"/> YES <input type="checkbox"/> NO	DEVELOPMENTALLY DISABLED? <input type="checkbox"/> YES <input type="checkbox"/> NO	OTHER DISABILITY (SPECIFY)			PRIMARY LANGUAGE SPOKEN IN HOME				
	IN FOSTER CARE? <input type="checkbox"/> YES <input type="checkbox"/> NO	IF VICTIM WAS IN OUT-OF-HOME CARE AT TIME OF INCIDENT, CHECK TYPE OF CARE: <input type="checkbox"/> DAY CARE <input type="checkbox"/> CHILD CARE CENTER <input type="checkbox"/> FOSTER FAMILY HOME <input type="checkbox"/> FAMILY FRIEND <input type="checkbox"/> GROUP HOME OR INSTITUTION <input type="checkbox"/> RELATIVE'S HOME			TYPE OF ABUSE (CHECK ONE OR MORE) <input type="checkbox"/> PHYSICAL <input type="checkbox"/> MENTAL <input type="checkbox"/> SEXUAL <input type="checkbox"/> NEGLECT <input type="checkbox"/> OTHER (SPECIFY)					
	RELATIONSHIP TO SUSPECT				PHOTOS TAKEN? <input type="checkbox"/> YES <input type="checkbox"/> NO	DID THE INCIDENT RESULT IN THIS VICTIM'S DEATH? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> UNK				
<b>D. INVOLVED PARTIES</b>	<b>VICTIM'S SIBLINGS</b>									
	NAME		BIRTHDATE	SEX	ETHNICITY	NAME		BIRTHDATE	SEX	ETHNICITY
	1. _____				3. _____					
	2. _____				4. _____					
	<b>VICTIM'S PARENTS/GUARDIANS</b>									
	NAME (LAST, FIRST, MIDDLE)				BIRTHDATE OR APPROX. AGE	SEX	ETHNICITY			
	ADDRESS		Street	City	Zip	HOME PHONE ( )	BUSINESS PHONE ( )			
	NAME (LAST, FIRST, MIDDLE)				BIRTHDATE OR APPROX. AGE	SEX	ETHNICITY			
	ADDRESS		Street	City	Zip	HOME PHONE ( )	BUSINESS PHONE ( )			
	<b>SUSPECT</b>									
SUSPECT'S NAME (LAST, FIRST, MIDDLE)				BIRTHDATE OR APPROX. AGE	SEX	ETHNICITY				
ADDRESS		Street	City	Zip	TELEPHONE ( )					
OTHER RELEVANT INFORMATION										
<b>E. INCIDENT INFORMATION</b>	IF NECESSARY, ATTACH EXTRA SHEET(S) OR OTHER FORM(S) AND CHECK THIS BOX <input type="checkbox"/> IF MULTIPLE VICTIMS, INDICATE NUMBER: _____									
	DATE / TIME OF INCIDENT			PLACE OF INCIDENT						
	NARRATIVE DESCRIPTION (What victim(s) said/what the mandated reporter observed/what person accompanying the victim(s) said/similar or past incidents involving the victim(s) or suspect)									





## Child Abuse Reporting: Commonly Asked Questions



### 1. Who am I to say what is abusive?

Professionals often feel reticent to label behavior as abusive. They may feel they have no right to pass judgment on other people. However, if reasonable suspicion exists, the protection of the child and compliance with the law must take precedence over these concerns. This protective action could be beneficial to parents, who might not recognize their behavior as abusive, or are reluctant to seek help.

### 2. What is the fine line between abuse and discipline?

If the discipline is excessive or forceful enough to leave injuries, physical abuse has occurred. The use of instruments increases the likelihood of injuries as does the excessive punishment of young children. The intent of the reporting law is not to interfere with appropriate parental discipline, but to respond to extreme or inappropriate discipline which is abusive. Some parents hit their children in places where injuries are not visible (the buttocks, the thighs, the back) using belts, whips or other potentially dangerous instruments. If one has reasonable suspicion of abuse, even with no visible signs, a report is required. Under California Welfare and Institutions Code Section 300(a), reasonable and age appropriate spanking to the buttocks where there is no evidence of serious physical injury does not constitute abuse.

### 3. What if abuse occurred in the past?

There is no time limitation regarding the reporting of child abuse. If a victim is under age 18, the abuse must be reported.

### 4. What if an adult states he or she was abused as a child?

The child abuse reporting law mandates a report when there is a reasonable suspicion or knowledge that minors may be in need of protection. Therefore, childhood abuse of adults should be reported if there is a reasonable suspicion that there may be another potential child victim.

### 5. At what age is a child most at risk of abuse?

All children are at risk of abuse, but infants and toddlers are most likely to sustain serious injuries due to their fragility. The mortality rate is highest for children ages 0-2.

It is possible to respond inappropriately to suspected abuse due to the age of a child. For example, sexual abuse of infants is more difficult to fathom than sexual abuse of adolescents, yet it does occur. Adolescents are also at risk of abuse but may not receive needed help because some adults may believe that adolescents sometimes provoke abuse or are better able to protect themselves or run away from abusive situations. Despite their age and size, adolescents are often just as vulnerable as younger children to physical, sexual and emotional abuse and neglect.

**6. At what age can children legally be left alone?**

There is no specific law which gives an age at which children can be left alone, nor is there any law which specifies a minimum age for a caretaker. Good judgment on the part of the parents is expected. The ages, number of children, the children's maturity, the length of time in care, and other characteristics should be considered.

**7. Do I have to report consensual sexual intercourse involving children?**

Reporting sexual intercourse between minors is governed by law and by court decisions. It is most important that the reporter is sure that the sexual intercourse is truly consensual; all non-consensual sexual intercourse must be reported. All incest, that is, sexual intercourse between closely related people, is reportable whether it is consensual or not. In all other situations the following apply:

- a. If both children are under the age of 14, and are close together in age, consensual sexual intercourse is not reportable. The courts have held that to report this is a breach of the right to privacy clause in the California Constitution. This is also true of minors ages 14 to 18.
- b. If one minor is over 14 years and one is under 14 years, the activity must be reported.
- c. Sexual intercourse between any minor and any adult should be reported. This is illegal sexual intercourse (formerly called statutory rape). Emergency Response will not investigate, but the incident will be reported to the appropriate police jurisdiction.
- d. Pregnancy of a minor is not reportable.

**8. What is the difference between children's "normal" sex play and sexual abuse?**

The lack of contemporary normative data regarding sexual activity among young children makes differentiating between normal sex play and sexual abuse difficult. It is clear, however, that very young children without exposure or experience do not usually have substantial or detailed knowledge about sexual activity, and that the child who exhibits developmentally inappropriate behaviors has probably either been exposed to that behavior or has experienced it. Exposure may have occurred directly, (by observing people engaged in those activities), by having personally been involved or indirectly through TV or pictures in a magazine.

Factors to be considered in addition to developmental appropriateness include the dynamics of the situation. Was coercion, threat, intimidation or force involved? Were age and size of the children involved similar? Even in cases involving children of similar age and size it is possible that the activity is abusive if threat, force or coercion is present.

Differences in emotional maturity and status must be evaluated. For example, a child who has been delegated the authority of "baby-sitter" by parents has a distinct status or power advantage over other children, even if the age differential is not large.

Many assessment questions must be considered when professionals are presented with situations in which children are engaging in sexual activity. It is important to understand not only the child's knowledge base but also the source of this knowledge.

**9. Are clergy mandated to report?**

Any clergy member who has knowledge of or observes a child, in his or her professional capacity whom he or she knows or reasonable suspects has been a victim of child abuse is required to report that abuse to a child protective agency. The only exception is for knowledge which a clergy member may acquire during a penitential communication which is defined as a communication intended to be in confidence, including, but not limited to a sacramental confession made to a clergy member who, in

the practice of his or her church is authorized or accustomed to hear those communications and under has a duty to keep those communications secret.

**10. Are alcohol programs exempt from reporting child abuse?**

No. The exemption in effect until 1987 for federally-funded alcohol/drug programs has been withdrawn. Today all alcohol or drug programs are required to make appropriate child abuse reports.

**11. Is a mandated reporter "on duty" twenty-four hours a day and required to make reports on family, neighbors or friends?**

In California the mandated reporting law specifically states that reporting is required when the reporter has knowledge of or observes a child, in his or her professional capacity or within the scope of his or her employment. Therefore a report is not required when information is obtained in a personal relationship. However, persons with knowledge of child abuse or neglect should examine their moral and ethical responsibilities to children when making such a decision.

**12. May reports be made anonymously?**

Mandated reporters are required to identify themselves when making child abuse reports; persons not legally required to report may make anonymous reports.

**13. Have I met my responsibility as a mandated reporter by putting the victim on the phone to make the report?**

No. The law requires that the mandated reporter make both the telephone report and complete the Suspected Child Abuse Report form. Some mandated reporters believe that there is some therapeutic benefit to having the victim report. The volume of calls coming into the Child Abuse is often very high and the social workers assigned are not prepared to meet the therapeutic needs of clients on the telephone.

**14. Should I inform the family that I have made a report to Emergency Response?**

As there is no law or regulation regarding this, good professional judgment should be used. If a child is in imminent danger and the perpetrator has access to the child it is better not to advise anyone in the family so that the child is not coerced into changing any disclosure. In other instances letting the family know can be helpful and therapeutic and may assist the professional who wishes to preserve a relationship with a client. Most psychotherapists or counselors do advise their patients. Parents should be advised of a report whenever possible since it is important that standards for acceptable child care be promulgated by all professions.

**15. What happens after a report is made?**

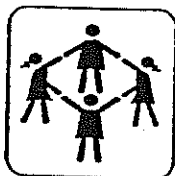
Child Protective Agencies (Social Services or the appropriate police jurisdiction) are responsible for investigating the referral once it is made. Emergency Response social workers and law enforcement will work together and share information, although their investigations are separate. When abuse has occurred within a family, the social worker's emphasis is to ensure the safety of a child and provide services to keep the family together.

Removing a child from the home is an action taken only when a child cannot remain there safely. If removal becomes necessary, the Juvenile Court has several options for placement including the non-custodial parent, relatives, foster homes, and group homes, in that order. Parents should be reassured that the Court's removal standards are stringent. The Court will order the Social Services Agency which provides child welfare services and the parents to work together for reunification as quickly as possible.

When abuse has occurred where the alleged perpetrator is not a member of the household (for example, a stranger molesting a child), law enforcement is responsible for investigating the referral. The Child Protective Agency will investigate to determine if the child is being protected at home. Once the agency has determined that the child is safe at home, then it may refer the family for counseling or medical care and to appropriate local community resources. A case of out-of-home abuse is generally closed by the Department of Family and Children's Services with the law enforcement agency continuing its investigation.

**16. What about testifying in court?**

The majority of cases do not go to trial. When they do, and the reporter is required to testify, it is important to remember that the testimony may be essential for the protection of the child.



Developed by the Emergency Response Bureau of the Santa Clara County Department of Family and Children's Services and adopted in part from "The California Child Abuse & Neglect Reporting Law," State Department of Social Services, Office of Child Abuse Prevention.

# How to Recognize Signs of Abuse

Federal law stipulates that each of us report any suspicion of abuse or neglect to Child Protective Services. Domestic Violence Intervention Services, Inc. of Tulsa, OK, developed this list to help identify victims.

## Infants and Toddlers (0-2 $\frac{1}{2}$ years)

- ✦ Developmental delay
- ✦ Failure to thrive—Due to the chaotic, loud, and harmful environment
- ✦ Emotional withdrawal/low frustration tolerance
- ✦ Physical problems—Frequent colds, ear infections, diarrhea, stomach aches

## Preschoolers (3-6 years)

- ✦ Developmental delay—Especially in language development. The child may be afraid to speak.
- ✦ Low frustration tolerance—Child cries easily and often.
- ✦ Acting out aggressively toward peers and adults—Modeling aggressive behaviors at home.
- ✦ Emotional withdrawal—Excessive thumbsucking, rocking, infant-like behaviors.
- ✦ Inability to play constructively—Lots of throwing or kicking, possibly even destruction of playthings.
- ✦ Inconsistent or inappropriate display of emotions—The result of the child not learning appropriate emotional responses.

## School-Age Child (7-11 years)

- ✦ Poor school performance—studying and learning are difficult when the child worries about what happened at home, or who will get hurt, or perhaps killed.
- ✦ Behavior problems with peers and adults—Child has not learned appropriate way to interact with others. Child may be crying out for help the only way she/he can and still keep the "family secret."
- ✦ Aggressive acting out becomes more severe and purposeful—Modeling the violent behavior

- ✦ Severe behavioral difficulties—Culmination of low frustration tolerance.
- ✦ Fearful/nightmares/night terrors—May be afraid of sleep because incidents of physical and/or sexual abuse occur at night.
- ✦ Withdrawn/depressed/hopeless/despondent—Life offers little other than physical and/or emotional pain. Joy is lost.
- ✦ Chronic physical complaints—Headaches, stomach aches. Child knows no other way to realize or describe emotional distress.
- ✦ Beginning to mimic adult roles—Girls adopting role of victim; boys becoming aggressive, abusive, or visa versa.
- ✦ Chronic low self-esteem—Child blames himself for situation at home.

## Adolescence (12-17 years)

- ✦ Depression—Loss of hope, joy, child full of sadness.
- ✦ Emotional neglect—The child has learned there is no one to listen or care. Many children, by this age, have abandoned efforts to reach parents.
- ✦ Evidence of physical injuries—Maiming, crippling, scarring, and even self-mutilation (cutting, burning, or hurting oneself).
- ✦ Aggression/delinquency/running away—Realizing no one will take care of their needs except themselves, adolescents use the only coping skills they have learned—violence and self-destruction.
- ✦ Severe behavioral problems—May be realized through eating disorders, often their only form of control in life.
- ✦ Poor school adjustment—Academically and socially unable to perform, and may be seen at school with black hair, black clothing, dark and ghoulish makeup.

- ✦ Proficient at mimicking adult roles—Teen carries role of victim or aggressor into interpersonal relationships outside the family.
- ✦ Early sexual activity/pregnancy/marriage—Provides a means of escape or acting out.
- ✦ Alcohol/drug experimentation or use—Another form of escapism; self-medicating for the pain (both physical and emotional).
- ✦ Death by suicide or murder—Taking of one's own life to end the pain or intervening to protect mother.
- ✦ Expansion of violence into the community—Criminal activity, sometimes through gang involvement.



National  
Dropout Prevention  
Center/Network

## NEWSLETTER

The *National Dropout Prevention Newsletter* is published quarterly by the National Dropout Prevention Center/Network. Your comments are always welcome. Please address mail to:

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# CPS REPORTING PROCEDURES

