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Senator Jeff Waldstreicher, Vice Chair
Judicial Proceedings Committee
Miller Senate Office Building, 2 East
Annapolis, MD 21401

**RE: SB 365 – Family Law – Child Custody Evaluators – Qualifications and Training
Position: Letter of Information**

Dear Chair Smith, Vice Chair Waldstreicher, and Members of the Committee:

The Maryland Psychological Association, (MPA), which represents over 1,000 doctoral level psychologists throughout the state, asks the Senate Judicial Proceedings Committee to consider the following comments during your review of SB 365.

The MPA recognizes the Committee's goal is to develop the qualifications and training necessary for mental health professionals who are appointed by the Courts to be custody evaluators in Maryland. We understand and appreciate the meaningful role mental health professionals have in these complex cases and the significant impact these evaluations can have on vulnerable youngsters in Maryland. We support your goal of ensuring that professionals involved in these evaluations have appropriate education and training including specialized knowledge in child development, family systems, intimate partner violence, child maltreatment, prevention of maltreatment, parenting, parent-child relationships, and family law, among others.

The MPA, however, is concerned that while the intent and goal of SB 365 is consistent with ensuring the professionals have the necessary specialized competence, some of the specific requirements and language in the bill are not recognized concepts in social science and are not supported by any known research or literature.

Some of our specific concerns include the following, among others:

- There is no accepted understanding or definition of "scope of parenting" or "Family function" and thus, requiring training in these areas is problematic;
- Requiring that forensic evaluators working with families when there are allegations of abuse **must** have clinical experience is confusing, unclear and not likely relevant to the task. As written, this might mean previous employment with child protective services or clinical practice treating victims when what is needed is knowledge of research that informs child protection, family treatment after allegations of abuse, and child outcomes after contact with CPS ;
- Requiring that all evaluators have training in "psychological testing" is problematic – while psychologists are routinely trained in psychological testing, no other discipline has such training and only psychologists and licensed professional counselors with advanced training are able to administer these tests. Thus this requirement will result in only psychologists and a very limited number of licensed professional counselors being qualified to complete parenting evaluations.

The MPA encourages the Committee to consider establishing a work group to include qualified licensed professionals, to address the specific qualifications, training, and experience that would best prepare evaluators to provide competent, evidenced based assessments that are designed to address the well-being of children. We would be happy to participate in such an endeavor. Thank you for considering our comments on SB 365. If we can be of any further assistance as the Senate Judicial Proceedings Committee considers this bill, please do not hesitate to contact MPA's Legislative Chair, Dr. Stephanie Wolf, JD, Ph.D. at mpalegislativcommittee@gmail.com.
Respectfully submitted,

Brian Corrado, Psy.D. .

Brian Corrado, Psy.D.
President

Stephanie Wolf, JD, Ph.D.

Stephanie Wolf, JD, Ph.D.
Chair, MPA Legislative Committee