June 25, 2025

**MEMORANDUM OF CONCERN**

**A.66A (Hevesi) / S.550A (Brisport)**

*AN ACT to amend the social services law, in relation to the administration of the statewide central register of child abuse and maltreatment.*

The New York Public Welfare Association (NYPWA) is a not-for-profit organization, representing the fifty-eight social services districts throughout the State of New York. These local offices provide and administer the full range of publicly funded social services and cash assistance programs. NYPWA has concerns with this legislation. [A.66A (Hevesi) / S.550A (Brisport)](https://www.nysenate.gov/legislation/bills/2025/S550/amendment/A?utm_campaign=subscriptions&utm_content=Confirmation&utm_medium=email&utm_source=ny_state_senate). We want to suggest several recommendations that could be addressed in chapter

Our concern with the recently passed legislation is that the elimination of any anonymous report alleging child abuse or maltreatment. No report would be given by the SCR to a local child protective service for investigation unless the caller's name and contact information is provided. **NYPWA notes that the requirement for a caller to identify themselves is no guarantee of the veracity of the information**.

While we agree the SCR process should not be weaponized against the subjects of a report, there are existing penalties that can be brought to bear for the filing of a false report. Additionally, as part of the investigative process, districts must determine the truthfulness of the allegations and assess the safety of the children in the home. If the information contained in the narrative report cannot be corroborated, the investigation is unfounded and legally sealed.

There are also **valid circumstances** when a reporter should remain anonymous. For example, a child should be permitted to report without fear that their information could be rejected by the SCR for an unwillingness to disclose their identifying information. We propose that as you consider the implementation of this regulation, that the SCR conducts an assessment of the reports it receives. If the family has an existing child protective history, or if the SCR determines, after assessing the information provided, that protecting the identity of the source is warranted, then those reports should be transmitted to the local district for investigation with the source information redacted. **The report, once assessed, could be marked sensitive by the SCR and the source’s identity would be withheld.** This would allow for the protection of the source in circumstances that warranty such confidentiality be protected.

NYPWA agrees that the SCR should not be weaponized, and bad actors making malicious or false calls to harass people need to be stopped. The collecting of caller information needs to be handled delicately. Local CPS units could run more efficiently if they were able to get recordings of calls to the SCR, or even redacted transcripts of calls, but that is not currently mandated. Additionally, this legislation helps to eliminate racial biases and protect individuals who are vulnerable to malicious reports without compromising their identities.

For these reasons we urge Governor Hochul to consider chapter amendments to this legislation.

For information contact:

Paul Brady, Executive Director

Matt Barron, Director of Policy & Communications

(518) 465-9305

info@nypwa.org