



# CENTER PIECE

The Official Newsletter of the National Child Protection Training Center

## In the Shadow of Defense Counsel: Conducting Peer Review of Forensic Interviews in an Age of Discovery

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*"I have always wanted to deal with everyone I meet candidly...If I have made any assertion not warranted by facts, and it is pointed out to me, I will withdraw it cheerfully." – Abraham Lincoln<sup>2</sup>*



### Introduction

Although peer review takes on many variations across the country,<sup>3</sup> it is clearly advisable, if not a necessity for forensic interviewers to regularly participate in a peer review process of their work. According to Michael Lamb, "interviewers continue to maintain or improve their skills *only* when they regularly review their own and others' interviews closely, discussing their strategies, successes and mistakes with other interviewers" (emphasis added).<sup>4</sup>

As forensic interviewers adhere to the better practice of conducting peer review of their work and in conducting peer review of the work of colleagues, it is important to consider the discovery of this process by defense counsel and those accused of maltreating children. Because there is no such thing as a perfect interview, some interviewers may be reluctant to participate in a process that may allow them to improve their skills and yet provides evidence for defense attorneys and defense experts to attack the statements of the child.

This is an understandable fear. Many defense "experts" have never conducted a forensic interview, have received no training in forensic interviewing, and are completely unfamiliar

with the interviewing protocols or methodologies they attack.<sup>5</sup> If these "experts" already testify as to the best practices in the field of forensic interviewing, a field most of them are completely unfamiliar with, it is likely they would also utilize any peer review process to further attack the credibility of a child.

Indeed, there is nothing the MDT team can do to avoid an attack on the forensic interview process, including peer review. If the interviewer participates in quarterly peer review, the defense expert and defense counsel will argue it should have been monthly. If the interviewer participates in monthly peer review, defense counsel will allege such regular peer review is evidence that the interviewer needs significant help in improving her skills. If the peer review consists of critiques from colleagues with the same or similar forensic interview training background, defense counsel will argue all of the reviewers were inadequately trained and hence their "reviews" are invalid. If the MDT keeps meticulous notes of the peer review process, defense counsel will cross-examine on any criticisms of the interview. If there are no records of the actual critiques, the defense counsel will argue the government is hiding something. If the MDT conducts peer review only on closed cases, defense counsel will argue the government doesn't want a record of its own shortcomings in pending cases – a record that could help the jury understand how flawed the evidence is. If the MDT conducts peer review on pending cases, the defense attorney will argue that such a process is a sham – after all, the peer reviewers know their critiques will be subpoenaed and thus the reviewers have no incentive to be brutally honest with the forensic interviewer.

## UP COMING conferences

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Location: The National Child Protection Training Center, Winona State University, Winona, MN

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Course Description: ChildFirst<sup>®</sup> is the forensic interview training program of the National Child Protection Training Center. Presented in collaboration with CornerHouse, this course is designed for investigative teams of law enforcement officers, social workers, prosecutors, child protection attorneys, and forensic interviewers. Students are taught the forensic interviewing protocol developed by CornerHouse. This protocol, entitled RATA<sup>®</sup>, has been specifically recognized and approved by a number of appellate courts. This course includes lecture and discussion, review of CornerHouse videotaped interviews, skill building exercises and an interview practicum.

ChildFirst<sup>®</sup> is limited to 40 students. Please be aware that this is an intensive course. The workshops are supplemented with homework assignments, which must be completed each night, and each student will be given a written examination at the end of the course. NCPTC supports a multidisciplinary approach to child abuse cases. The ideal team consists of a prosecutor, a forensic interviewer, an investigator and/or Child Protective Services worker. If your team varies from this norm, please attach to your application an explanation of the unique makeup of your team and why you would benefit from the training. Individual application will also be considered. Please visit [www.ncptc.org](http://www.ncptc.org) to download the application. Completed application should be submitted by fax to 507-457-2899 or by email to [trainings@napsac.us](mailto:trainings@napsac.us). All accepted applicants will be notified.



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Simply put, whatever the MDT does or does not do as part of the forensic interviewing process, including peer review, will be attacked by defense counsel. Andrew Agatston explains the necessity of the defense counsel to engage in this sort of gamesmanship:

If I was a criminal defense lawyer, I would sweat that forensic interview tape. I would sweat the child-friendly room. I would sweat all the coloring that goes on during rapport building. I would sweat how small and innocent and vulnerable the child looks. I would sweat all the stuff that happens even before the child talks about the abuse, let alone when the child starts talking about abuse.... From the defense perspective, it *must* be attacked. The defense must either keep it from being played, or attack the manner in which it was conducted (emphasis added).<sup>6</sup>

Accordingly, the MDT should not focus on avoiding a defense attack of the peer review process, any more than the MDT should focus on conducting a forensic interview in a manner to avoid a defense attack. It is the job of the defense attorney to attack any and all aspects of the government's case. Accordingly, the challenge of the MDT is to conduct a peer review process which enables the prosecutor to expose the defense attack as incredible, even silly.

All of the above referenced attacks on the peer review process can be overcome. The key for the MDT is to avoid a legitimate attack. The MDT that does not conduct any peer review of its forensic interviews will be hard pressed to defend this failure when attacked in

court. The concept of peer review, and its importance in maintaining and improving interviewer skills is so well established in the literature and so well accepted in the field that jurisdictions failing to do so could only concede at trial that their method of collecting evidence is flawed, though perhaps not fatally.<sup>7</sup>

This article offers guidelines which, if followed, will allow forensic interviewers to participate in peer review with little fear that this process will be used, or at least used successfully, by defense attorneys and defense experts seeking to undermine the credibility of a child's allegation of abuse. Indeed, these guidelines may enhance the ability of the prosecutor to point to the peer review process as further evidence that the child was interviewed by a competent professional whose work is regularly and rigorously reviewed.

### **An overview of the prosecutor's discovery obligations**

The purpose of discovery in a criminal trial is to "provide information for informed pleas, expedite trials, minimize surprise, afford the opportunity for effective cross-examination, meet the requirements of due process, and otherwise serve the interests of justice."<sup>8</sup> Accordingly, the prosecutor "should diligently pursue discovery of material information and freely, fully, and promptly comply with lawful discovery requests from defense counsel."<sup>9</sup> With certain exceptions, the prosecutor should disclose:

1. The names and addresses of persons the prosecutor intends to call as a witness "together with their relevant statements, including memoranda reporting or summarizing their oral statements."
2. Any and all "reports, results or statements of experts made in connection with the particular cases which the prosecutor intends to introduce into evidence, including results of physical or mental examinations, scientific tests, experiments, or comparisons."
3. Any and all "books, papers, documents, photographs, and tangible objects which the prosecution intends to introduce into evidence..."<sup>10</sup>

### **Applying these rules to the process of peer review**

The prosecutor should certainly disclose the contact information for the forensic interviewer as well as any reports or other documents prepared by the forensic interviewer. If, for example, the forensic interviewer has prepared a summary of the interview, this report will need to be shared with defense counsel. The prosecutor will have to inform defense counsel of the video and audio tape of the forensic interview and make it available for inspection but, absent a protective order governing the usage of the tape, may not have to provide an actual copy of the tape to defense counsel.

With respect to the disclosure of the peer review process, it may depend, at least in part, on the nature of the peer review, whether the prosecutor will utilize any aspect of the peer review process in the government's case-in-chief, and whether the prosecutor will seek to qualify the forensic interviewer as an expert witness relying, in part, on the interviewer's ongoing education which includes participation in peer review.

### **Peer review on closed cases**

If the peer review is done on cases in which the trial and appellate process is complete, it is unlikely the results of this process needs to be disclosed. This is because a peer review on closed cases likely has no relevance on the case or cases pending before the court. If, however, a peer review process has revealed that a forensic interviewer is plainly incompetent, and the prosecutor is aware of this conclusion from the peer reviewers, this evidence may have to be disclosed. This is because the prosecutor has an obligation to disclose any evidence that may be exculpatory.<sup>12</sup> Particularly in cases in which the defense strategy is to attack the forensic interviewer,<sup>13</sup> failure to disclose evidence of interviewer incompetence likely abridges the law and a prosecutor's ethical code.<sup>14</sup>

This scenario, however, should rarely, if ever be present. If an interviewer is plainly incompetent, and this belief is widely held among the MDT or revealed in the peer review process, it is likely that the team has prohibited the interviewer from ongoing work as a forensic interviewer at least until he or she can perform satisfactorily.

Even if the prosecutor is seeking to qualify a peer reviewer as an expert witness and is relying in part on the interviewer's participation in peer review, the actual content of any and all peer review sessions is likely irrelevant. This is because the purpose of the peer review is to demonstrate ongoing education and training in the field, not perfection. In the same way a prosecutor may disclose that a forensic interviewer has an undergraduate or graduate degree in a relevant field but would not have to point out if the witness failed to score perfectly on every examination in every class, the prosecutor should not be compelled to locate every comment from every peer reviewer who ever had a suggestion for the forensic interviewer called as a witness. Unless, as noted previously, the peer review reveals plain incompetence or something genuinely exculpatory, the details of every single peer review session is not relevant - particularly when the peer review was not conducted on the case pending before the court.

Not only is peer review on closed cases less likely to result in evidence for defense counsel and defense experts, this sort of peer review may be the most effective. In reviewing closed cases, the sum total of the evidence can be drawn upon in evaluating the interview. For example, in addition to critiquing whether or not the interviewer adhered to a protocol, asked developmentally appropriate questions or introduced anatomical dolls consistent with research, the peer review team and the individual interviewer can also discuss how the interview was evaluated by the jury, what defense attacks were made, and whether the team properly used the interview to obtain corroborating evidence.<sup>15</sup>

Indeed, this broader form of peer review could involve: 1) a critique of the forensic interview in terms of adherence to the protocol, the appropriateness of questions, etc; 2) a critique from the investigator, social worker and prosecutor in terms of whether or not the interview solicited the information necessary to protect the child or obtain justice in a court of law; or 3) a critique of the other team members and their role in the collection of this evidence - did the investigator fully corroborate the child's statement, did the prosecutor successfully defend the interview in court against any illegitimate attacks, etc?

A possible disadvantage to conducting peer review only on closed cases is that a new interviewer who does not have many closed cases may go months or years before he or she can be reviewed on the quality of his or her work. This may not be as great of a challenge as it first appears. As noted below, the court process itself may serve as a rigorous review of the interviewer's work. Moreover, cases in which abuse is not found will likely be available for prompt if not immediate review. Providing a new interviewer with a mentor or other supervision in the early months of work may also be sufficient, if not more effective in providing immediate feedback until the interviewer has developed a large enough body of work to participate in a more formal peer review process.

### Peer review on pending cases

There is an advantage to immediate or at least prompt peer review of a forensic interview. Immediate or prompt peer review provides the interviewer with feedback while the interview is fresh in his/her mind and can apply suggestions immediately in all future interviews. In a very real sense, immediate peer review is conducted in all high-functioning multi-disciplinary teams.<sup>16</sup> This is because the forensic interviewer, as part of a multi-disciplinary team, assesses the child's statement for investigative and court purposes.<sup>17</sup> If a case results in criminal charges, the interviewer and the prosecutor will closely scrutinize the interview for any errors and otherwise anticipate defense attacks.<sup>18</sup> In cases in which a defense expert is called to attack the forensic interview, an extensive, adversarial critique of the forensic interview may take place.<sup>19</sup> A prosecutor and forensic interviewer preparing to respond to such an attack are unlikely to have to disclose their own critiques of the forensic interview. An internal critique in preparation for trial is likely work product and is protected from discovery.<sup>20</sup> An internal critique of this type is also not exculpatory in the sense the defense counsel has already been provided with a copy of the forensic interview, or at least access to the videotape of the interview, and it is not the job of the government to critique the interview for defense counsel.

Although the evaluation of a forensic interview through the court process may be more rigorous, and certainly more stressful, than a typical peer review, it is not necessarily more helpful. This is because an evaluation of the interview solely for court purposes may focus on countering illegitimate defense attacks on the interview as opposed to examining the interview from the standpoint of best practices in the field. Accordingly, a team may find there is an advantage to conducting a formal, immediate peer review of forensic interviews separate and apart from what may occur as part of the court process.

If a team makes the decision to conduct immediate peer review separate and apart from an internal critique in preparation for trial, is this peer review process discoverable? Before answering this question, perhaps the MDT as a whole, and the prosecutor in particular, should ask "is there any reason to keep the peer review process private?" Assuming the forensic interviewer is well trained and conducts competent forensic interviews, the peer review process will likely focus on the margins. To the extent the interviewer made errors that were not critical, a sage prosecutor will likely draw out these errors as part of the direct examination of the forensic interviewer rather than wait until the defense attorney addresses the same points on cross-examination.





Under this scenario, any discovery of the peer review process would only reveal what the prosecutor and forensic interviewer would concede in any event—that the interview was not perfect but was well-conducted as a whole. The defense attorney is unlikely to subpoena peer reviewers who will likely confirm that the interviewer did a good job. Indeed, if the peer review is favorable to the government, and the prosecutor is using this in qualifying an interviewer as an expert witness,<sup>21</sup> it may be the defense counsel, not the prosecutor seeking to limit evidence concerning the peer review process.

The greater danger, perhaps, is that the possibility of the discovery of the peer review process may inhibit some team members from complete candor with the interviewer for fear their critiques will be unfairly twisted by defense attorneys or defense experts. If the peer review is primarily oral, as opposed to written, this possibility will be lessened. This is because the defense attorney may then be forced to subpoena the peer reviewers – a dangerous proposition since the peer reviewers will likely be able to put their critique in the context of the overall evaluation of the forensic interview. Since the peer review process is not for investigative purposes, but as part of the ongoing learning process of forensic interviewers, there may be little need to document the peer review itself, but simply that it took place and who participated in the peer review process.

If the prosecutor, and the MDT as a whole, seeks to limit or completely exclude defense counsel from accessing

the specific comments made or notes taken during the peer review process, the starting point for exploring this issue may be the United States Supreme Court decision *Pennsylvania v. Ritchie*.<sup>22</sup>

*Ritchie* involved a criminal case of child sexual abuse. The defendant sought but was denied access to the entire CPS file. Although the United States Supreme Court, under a due process analysis, held the defendant had a right to have the CPS files reviewed by the court, the “defendant’s right to discover exculpatory evidence does not include the unsupervised authority to search through the Commonwealth’s files.”<sup>23</sup>

The defendant in *Ritchie* merely demonstrated a realistic possibility that the CPS file might result in exculpatory evidence. In commenting on this ruling, law professor John Myers noted “(It would seem that such a ruling would lead to in camera inspection in virtually every case.”<sup>24</sup>

Accordingly, although the government may have an interest in protecting the confidentiality of the peer review process in order to facilitate a full and meaningful critique of an interviewer’s work, the defendant may be able to meet the *Ritchie* standard that discovery of the peer review discussion may be exculpatory – particularly when the defense is rooted in an attack on the forensic interview.

Under such a scenario, the defense attorney may be entitled at least to an in camera inspection of any records pertaining to the peer review process of the forensic interview in question. If there is anything in those records relevant to the defendant’s defense, the court will likely order that portion of the record released.

### Civil child protection cases

Thus far, the discussion has centered exclusively on access to peer review records in criminal cases. If the case is in civil child protection court, the attorney for an accused perpetrator may have greater access to any records pertaining to the evidence. For example, the discovery rules governing child protection court in Minnesota obligate the government to disclose “all information, material and items within the petitioner’s possession or control which *relate to the case*” (emphasis

added) and “shall provide any party with the substance of any oral statements which *relate to the case*.”<sup>25</sup> To the extent written or oral statements conducted in a peer review of a forensic interview in a pending case of child protection relate to the case, the information is likely discoverable. Since the parent in such a case is often also the defendant in a criminal case, the defendant and defense counsel may be able to access this information through the civil child protection case.

Another reason why discovery in a civil child protection case may be broader is that the allegation the government is attempting to prove is broader. In a criminal case, the government is attempting to prove a particular act, committed by a particular party on a particular date. Accordingly, a child’s therapy records may not be pertinent to a specific allegation of sexual abuse. In a civil child protection case, however, the government may be attempting to prove something much broader—such as the child’s “behavior, condition or environment is such as to be injurious or dangerous to the child or others.”<sup>26</sup> The broader the allegation, the broader the parent’s rights may be to discover fully everything the government knows about the child or any evidence taken from the child. Under this broader allegation, for example, therapy records may not be discoverable in a criminal case involving a specific allegation of sexual abuse but they may be discoverable in a civil child protection case to show the child’s injurious “behavior, condition or environment” is not caused by the conduct of the parent.





## Conclusion

It is important for every multi-disciplinary team to fully evaluate the process of conducting peer review. As part of this evaluation, it is essential to involve the local prosecutor and the local child protection attorney in this process to fully consider the admissibility of the peer review process in criminal or civil child protection cases. The general outline provided in this article may take on any innumerable nuances dependent on local practices and statutes. Nonetheless, as a broadly stated principle, the following guidelines serve as a starting point for discussion:

1. Any peer review of forensic interviewers on closed cases are likely not discoverable in criminal or civil child protection cases precisely because they occur after the cases are closed and are not relevant to different, pending cases of child abuse. In the same way a physician's examination of an alleged child maltreatment victim months or years ago is irrelevant to the examination of a child in a pending case, a forensic interviewer's work in other cases is irrelevant to the interview at issue in a pending case. Even if the prosecutor highlights participation in peer review in establishing the interviewer's expertise, it is unlikely the government will have to track down every comment that every peer reviewer has ever made to the forensic interviewer. The only exception might be if the peer review reveals that an interviewer is plainly incompetent. Such a conclusion might be exculpatory

evidence particularly in pending cases in which the defendant is attacking the forensic interview and the forensic interviewer.

2. Peer review of forensic interviewers on pending cases may be discoverable in civil or criminal child protection cases, particularly when the defense is based at least in part on an attack of the forensic interview or forensic interviewer. If, though, the government would likely disclose errors as part of its case in chief, it is questionable whether or not this discovery hurts the government. Assuming any errors are minor, and the peer review process as a whole supports the quality of the forensic interviewer and the interview in question, the discovery of the peer review process may actually bolster the government's case. This is particularly so when the peer review process is oral and the defense counsel would have to subpoena the peer reviewers into court. Assuming these peer reviewers would agree to the overall quality of the forensic interview, the defense counsel is unlikely to go down this road.
3. If the government is concerned that routine discovery of the peer review process in pending cases will inhibit the value of peer review, the government may argue that an inspection of any records governing this process be done in camera.

Some years ago, many investigators and prosecutors were deeply concerned about the videotaping of forensic interviews. The primary fear was that a recording of these interviews would allow defense counsel to tear apart a child's statement as well as the conduct of the forensic interviewer. In reality, videotaping forensic interviews appears to have improved the government's cases and has worked to the detriment of defendants and defense counsel.<sup>27</sup> This is because videotaping has generally documented the high quality of forensic interviews. It may also prove to be true that disclosure of the peer review process, even on pending cases, does not hinder but actually strengthens the government's case by documenting the quality of the interviewer as a whole or specifically in a case in question. As a final comment, this discussion highlights the critical importance of

prosecutors and child protection attorneys serving as part of our MDTs and receiving forensic interview training. Prosecutors and child protection attorneys who have been thoroughly trained in forensic interviewing will be better equipped to articulate the forensic interview process and the role of peer review to the trial and appellate courts who will consider the legal issues surrounding forensic interviews, and the review of these interviews. Similarly, prosecutors well-trained in forensic interviewing are also in the best position to highlight the absurdity of many defense attacks on legitimate forensic interviewing practices, including peer review.

## Endnotes

- <sup>1</sup> Director, NAPSAC's National Child Protection Training Center at Winona State University. The author thanks Joe Del Russo, Brian Holmgren, Mike Johnson, Pam Karalunas, Tom Leclair, Amy Russell, Steve Sedensky, Suzanna Tiapula, and Susanne Walters for their review and comments on earlier drafts of this paper.
- <sup>2</sup> GENE GRIESSMAN, *THE WORDS LINCOLN LIVED BY* 20 (1997).
- <sup>3</sup> Peer review can vary not only in the format but also in the makeup of those conducting the peer review. Peer review could be conducted only among forensic interviewers at a CAC; by regional or state groups of forensic interviewers; by state or national experts who review tapes or transcripts of interviews sent to them; by the investigative team (law enforcement, CPS); or by the investigative team and the prosecutor.
- <sup>4</sup> Lamb, et al., *A Structured Forensic Interview Protocol Improves the Quality and Informativeness (sic) of Investigative Interviews with Children: A Review of Research using the NICHD Investigative Interview Protocol*, 31 CHILD ABUSE & NEGLECT 1201, 1210 (2007).
- <sup>5</sup> See Victor I. Vieth, *When the Smoke Clears: Cross-Examining the Defense Expert's Attack on a Forensic Interview*, presented at When Words Matter: Emerging Issues in Forensic Interviewing (St. Louis, MO, May 5, 2009).
- <sup>6</sup> ANDREW H. AGATSON, *THE LEGAL EAGLES OF CHILDREN'S ADVOCACY CENTERS: A LAWYER'S GUIDE TO SOARING IN THE COURTROOM* 106 (2009).
- <sup>7</sup> If, for example, the forensic interview is clearly well-conducted and the government has corroborating evidence, especially a confession, the government may still prevail at trial despite the failure to conduct peer review.
- <sup>8</sup> NATIONAL PROSECUTION STANDARDS, SECOND EDITION 52.1 (National District Attorneys Association 1991) (as of this writing, the NPS standards are undergoing revision).
- <sup>9</sup> *Id.* 52.2.
- <sup>10</sup> *Id.* 53.2 (a), (b), (c).
- <sup>11</sup> See *State v. Johnson*, 659 N.W.2d 819 (Minn. Ct. App. 2003).
- <sup>12</sup> National Prosecution Standards 53.5 (noting the prosecutor should "disclose to defense counsel any material or information within his actual knowledge and within his possession and control which tends to negate or reduce the guilt of the defendant pertaining to the offense charged.").
- <sup>13</sup> See MYERS ON EVIDENCE IN CHILD, DOMESTIC AND ELDER ABUSE CASES VOLUME 1, SECTION 1.13 (2005) (noting that "attacking the interviewer is a common strategy" employed by defense attorneys in cases of child abuse).



<sup>14</sup> National Prosecution Standards 53.5 (noting the prosecutor should "disclose to defense counsel any material or information within his actual knowledge and within his possession and control which tends to negate or reduce the guilt of the defendant pertaining to the offense charged.")

<sup>15</sup> Victor I. Vieth, *When the Child Stands Alone: The Search for Corroborating Evidence*, 12(6) UPDATE (1999) (published by the National District Attorney's Association and available on-line at [www.ndaa.org](http://www.ndaa.org), click on "Update" newsletter).

<sup>16</sup> See generally; Victor I. Vieth, *In My Neighbor's House: A Proposal to Address Child Abuse in Rural America*, 22 HAMLIN LAW REVIEW 143 (1998).

<sup>17</sup> See generally; Amy Russell, *Assessing Children's Statements for Investigative and Court Purposes*,

1(6) CENTERPIECE (2009) (available on-line at [www.ncptc.org](http://www.ncptc.org) under "publications").

<sup>18</sup> See Victor I. Vieth, *Testifying in Court as a Forensic Interviewer: Defending an Investigative Interview from the Witness Stand*, 1(3) CENTERPIECE (2008) (available online at [www.ncptc.org](http://www.ncptc.org) under "publications").

<sup>19</sup> See generally; Victor I. Vieth, *The Forensic Interviewer at Trial: Guidelines for the Admission and Scope of Expert Testimony Concerning an Investigative Interview in a Case of Child Abuse*, WM. MITCHELL L. REV. (forthcoming Fall 2009).

<sup>20</sup> In most states, the rules of criminal procedure do not require the prosecutor to disclose work product of the prosecutor or agencies participating in the prosecution. In Minnesota, for example, the rules state the prosecutor does not have to disclose "legal research, records, correspondence, reports or memoranda to the extent they contain the opinions, theories or conclusions of the prosecuting attorney or members of the prosecution staff or officials or official agencies participating in the prosecution." MINN. R. CRIM P. 9.01 SUBD. 3 (1).

<sup>21</sup> See *Supra* note 19.

<sup>22</sup> 480 U.S. 39 (1987).

<sup>23</sup> *Id.* At 58.

<sup>24</sup> JOHN E.B. MYERS, EVIDENCE IN CHILD ABUSE AND NEGLECT CASES THIRD EDITION, SECTION 2.16, page 279 n. 237 (1997).

<sup>25</sup> RULE 17.01(A) MINN. R. JUV. PROTECTION.

<sup>26</sup> Minn. Stat. section 260C, subd. 6(9).

<sup>27</sup> See Frank Vandervort, *Videotaping Investigative Interviews of Children in Cases of Child Sexual Abuse: One Community's Approach*, 96 JOURNAL OF CRIMINAL LAW & CRIMINOLOGY (2006).



## For More Information

The National Child Protection Training Center (NCPTC) at Winona State University is a training program of the National Association to Prevent Sexual Abuse of Children (NAPSAC). NCPTC provides training, technical assistance and publications to child protection professionals throughout the United States. In addition, NCPTC assists undergraduate and graduate programs seeking to improve the education provided to future child protection professionals. In partnership with CornerHouse, NCPTC also assists in the development and maintenance of forensic interview training programs utilizing the RATA<sup>®</sup> forensic interviewing protocol. For further information, contact NCPTC at 507-457-2890 or visit our website at [www.ncptc.org](http://www.ncptc.org). For further information about NAPSAC, call 651-340-0537 or visit our website at [www.napsac.us](http://www.napsac.us).

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