

South Carolina Children's Justice Act Task Force
2021 Three-Year Assessment Report



Prepared by the Children's Law Center

SC Children's Justice Act Task Force 2021 Three-Year Assessment Report

I. Task Force Overview

The federal Children's Justice Act (CJA) provides grants to states to develop, establish, and operate programs designed to improve the investigation, prosecution, and judicial handling of cases of child abuse and neglect, particularly child sexual abuse and exploitation, in a manner that limits additional trauma to the child victim. This also includes the handling of child fatality cases in which child abuse or neglect is suspected and some cases of children with disabilities and serious health problems who also are victims of abuse and neglect.

To be eligible for CJA funds, states are required to establish and maintain a task force on children's justice. In accordance with federal statutory requirements, membership must be multidisciplinary and must comprise at least one slot for each of a multitude of disciplines. South Carolina has maintained an active Children's Justice Act Task Force since 1994. The purpose and activities of the Task Force, as defined by its bylaws and federal statute, are as follows:

- To conduct an assessment of the state's systems responding to abused and neglected children at three-year intervals;
- To adopt recommendations in each of the CJA categories;
- To work towards implementation of these recommendations;
- To recommend to the state's grantee (S.C. Department of Social Services) projects to be supported by the CJA grant funds; and
- To express positions on legislation or state policy issues, consistent with its mission and recommendations.

The SC Department of Social Services has been designated the state's CJA grantee and contracts with USC's Children's Law Center as recommended by the Task Force. The Children's Law Center receives the CJA funding to support the Task Force and assist in implementation of its recommendations.

II. Accomplishment Highlights for 2018-2021

Undoubtedly, the largest accomplishment of the Task Force during this period is the achievement of an established statewide child abuse response protocol document and a successful legislative mandate for its use. The protocol was established by a Task Force convened advisory group of child-serving agency representatives. The 52-page protocol utilizes Children's Advocacy Centers and the multi-disciplinary team approach. The protocol document is housed on the website of the SC Network of Children's Advocacy Centers: <https://www.cac-sc.org/protocol>. The Child Abuse Response Protocol Act was

signed into law by the Governor of South Carolina on May 6, 2021. The following other Task Force accomplishment highlights were also achieved as a result of the recommendations formed pursuant to the 2018 state assessment:

- Provided multidisciplinary training on communication strategies with children with limited communication skills and distributed consultation list of qualified resource professionals
- Monitored compliance with Best Legal Practices by conducting extended evaluations with external partners post-training
- Examined the prevalence of children testifying in SC courts and the usage of CCTV testimony; and hosted training for DSS/GAL attorneys to improve their skills when handling court cases with children who must testify
- Updated, printed, and distributed child court notebooks for children having to appear in family court
- Supported multidisciplinary teams (MDTs) to improve their response to high-risk victims for recantation
- Coordinated and provided intensive child death investigation training for coroners and investigators
- Reviewed safety plan protocol/implementation and provided input for policy improvements/revisions
- Created and distributed an educational document for school personnel clarifying confidentiality requirements and what to expect following a report of child abuse
- Worked with the SCNCAC to broaden collaboration between schools and Children's Advocacy Centers by encouraging school representation on MDTs
- Supported the South Carolina Network of Children's Advocacy Centers (SCNCAC)
- Supported the operations of the Children's Law Center to provide applicable resources and trainings

III. Overview of the 2021 Three-Year Assessment Process

Planning for the assessment began in September 2020 by forming an ad-hoc Operations Committee which was facilitated by the CJA Coordinator. Seven CJA members volunteered to serve on the committee. The purpose of the committee was to examine the Task Force bylaws and make any amendment recommendations, to examine the three-year assessment processes of the past, and to propose a plan for the 2021 assessment process. The committee's recommendation was to administer a smaller scale survey from the Task Force to key partner agencies and groups in an effort to align initiatives and promote agency collaboration. The proposal was presented to and approved by the whole Task Force at the October 2020 meeting. The assessment survey was very narrow in scope, only four questions, and was designed to target the partner groups' initiatives that fell under the scope of CJA parameters. The parameters of CJA projects were defined as programs that are designed to improve the investigation, prosecution, and judicial handling of cases of child abuse and neglect, as well as child sexual exploitation and child fatality cases. The survey was administered in November 2020 so that results could be reviewed in January 2021 as

part of the three-year assessment. Responses for consideration were received from the following groups:

Department of Social Services (DSS)
Court Improvement Program (CIP)
SC Network of Children's Advocacy Centers (SCNCAC)
State Law Enforcement Division (SLED)- child fatality unit
DSS- child fatality division
Guardian ad Litem Program (GAL)
Richland County Court Appointed Special Advocates (CASA)
Joint Citizens and Legislative Committee on Children (JCLCC)
Department of Children's Advocacy (DCA)
Foster Care Review Board (FCRB)
Department of Juvenile Justice (DJJ)
Family Court Bench Bar Committee
Department of Education

The assessment survey consisted of the following four questions:

1. What are your agency's initiatives/priorities that fall within CJA parameters (top 5 if there are many)?
2. What obstacles do you have or anticipate to attaining those priorities?
3. What collaboration barriers, successes, or expansion efforts do you have?
4. Any desired recommendations for system improvements?

The responses were shared with the Task Force along with a summary document (see attachment on page 10).

At the January 2021 meeting, the Task Force members heard a general summary of the survey responses and had some discussion. The second portion of the assessment took place in February 2021 at a special work-day meeting. The Department of Social Services, the Court Improvement Program, the SC Network of Children's Advocacy Centers, SC Department of Children's Advocacy, and the SC Department of Education, Office of Special Education Services were asked to provide explanation of their submitted responses. Instructions and limitations were provided to guide the recommendation drafting. Members were asked to consider the desired outcome, activities to be carried out, and how improvement could be measured, while drafting recommendations. The summary document of agency initiatives/priorities was provided again for reference. Task Force members were randomly divided into four work-groups in the virtual platform. A Children's Law Center staff member was assigned to each of the four groups to take notes and document the recommendation drafts. Each group drafted between five and nine recommendations for consideration.

The Children's Law Center staff met with the Task Force Chair and Vice Chair to review the submitted draft recommendations and worked to consolidate any similar submissions. They were able to refine the list to 21 recommendations plus three standing and carry-over

items. The 21 draft recommendations were then sent to the Task Force members and they were asked to vote for their top selections, choosing up to 15. The results of that selection process yielded a final list of 14 recommendations plus the three standing/carry-over items. Those 14 recommendations were organized into the three required CJA categories and then those categories also serve as the committee topics for the 2021-2024 cycle: Committee A: Training and Judicial Improvements, Committee B: Model Programming, and Committee C: Child Protection Reform. Task Force members were sent a survey for them to indicate their committee preference. The new committees met in virtual break-out sessions on April 30, 2021 to finalize their recommendations and plan preliminary activities.

One of the carry-over items (securing a legislative mandate for the protocol) was accomplished in May 2021, so that recommendation was removed from the list, leaving a total of 16 recommendations.

IV. Recommendations for 2021-2024

The following recommendations were developed as a result of the 2021 three-year assessment process which will guide the work of the Task Force over the next three-year period:

Category A. Recommendations for investigative, administrative, and judicial improvements, including training:

- 1.A** Provide multidisciplinary trainings regarding the unique aspects involved in the recognition, investigation, and prosecution of **maltreatment of children with disabilities**, to include recognition within virtual settings.
- 2.A** Continue to build upon trainings regarding **multidisciplinary child death investigations**, including the identification of barriers to effectively implementing the Child Death Investigation Task Forces (CDITF) rapid response.
- 3.A** Provide multidisciplinary training events, to include the faith community, on **family violence**, utilizing leading experts on research in this area.
- 4.A** Provide multidisciplinary training to include volunteer guardians ad litem and community stakeholders (providers, school counselors, DSS, etc.) on working with cases involving **crossover youth with DSS and DJJ**.
- 5.A** Continue to provide, and expand upon, trainings focused on reducing stress and trauma to **children who must testify** in either, or both, family court and general sessions court. This includes coordination with SC Court Administration to provide **training opportunities to the judiciary** regarding developmentally appropriate

and legally defensible courtrooms for **child victims and/or witnesses appearing in court.**

- 6.A** Support the Court Improvement Program to improve the **quality of child abuse and neglect hearings** by ensuring all necessary parties are served with notice of the hearing and that they are engaged and participate meaningfully in the proceedings; and by looking at causes for continuances and ways to alleviate those that are avoidable.

Category B. Recommendations for experimental, demonstration and model programs:

- 7.B** Develop and deliver a **training curriculum for local multidisciplinary teams** on the SC Child Abuse Response **Protocol**, modify the trainings for each county, and include schools in the MDTs.
- 8.B** Collaborate with the **statewide Forensic Nurse Examiner Task Force** to develop and implement tools that will expand and improve resources to handle the preliminary investigation of child sexual abuse.
- 9.B** Collaborate with the **statewide Human Trafficking Task Force** to identify and address gaps in resources that are needed to support suspected victims of sex trafficking along the process from identification to court.
- 10.B** Support the expansion of CAC involvement in the **Safe Babies Court initiative** in South Carolina and monitor the project to determine additional ways to support growth and success of Safe Babies Courts.
- 11.B** Obtain and/or enhance **protections in SC for recordings of forensic interviews** of child abuse victims.
- 12.B** Continue to support the **SC Network of Children’s Advocacy Centers** including organizational capacity and infrastructural resources.
- 13.B** Continue to support the operation of the **Children’s Law Center** which is a training and information resource center for professionals involved in child maltreatment proceedings. Operations include implementing the training recommendations in collaboration with the Task Force, and providing research and logistical support to the Task Force.

Category C: Recommendations for reform of state laws, ordinances, regulations, procedures, or protocols:

- 14.C** Provide support for any **child abuse legislation** that the Children’s Justice Act Task Force deems will improve the state’s response to abused and neglected children, **including the commercial sex trafficking of children.**
- 15.C** Investigate the feasibility of **integrating data systems** that would allow for a comprehensive collaborative database that would track child abuse cases from initial referral through closure of services. In addition, investigate data sets that are already available in order to measure positive outcomes into adulthood.
- 16.C** Encourage child serving agency examination of **racial disparities** of children involved with the child welfare system.

V. Description of Recommendation Activities

The following preliminary activities are planned to address the recommendations:

1. Provide multidisciplinary trainings regarding the unique aspects involved in the recognition, investigation, and prosecution of maltreatment of children with disabilities, to include recognition within virtual settings. The Task Force would like to continue to make efforts to increase understanding of different aspects of disabilities and provide resources so that lack of knowledge and understanding of disabilities are not a barrier to recognition, investigation, and prosecution for disabled children. In addition to training, other activities may include encouraging the development of a screener/tool or flowchart to assist in determining when to make a report of abuse or neglect and identifying available resources and contacts to assist with the investigation, prosecution, and courtroom involvement. (Recommendation 1.A)

2. Continue to build upon trainings regarding multidisciplinary child death investigations, including the identification of barriers to effectively implementing the Child Death Investigation Task Forces (CDITF) rapid response. The Task Force will strive to increase the consistent use of a CDITF and increase the number of partners who are specially trained in child death investigations. Efforts will be made to identify and attempt to resolve barriers to the consistent use of a CDITF. In addition, the Task Force will provide education and awareness regarding the coroner’s duty to conduct child death reviews and the benefits of the CDITF. (Recommendation 2.A)

3. Provide multidisciplinary training events, to include the faith community, on family violence, utilizing leading experts on research in this area. The Task Force would like to increase education and awareness among multidisciplinary professionals as well as the community regarding family violence and child-related trauma. Leading experts

on corporal punishment/physical abuse research will be utilized for these events. Alternate tools for discipline and redirection may be shared. (Recommendation 3.A)

4. Provide multidisciplinary training to include volunteer guardians ad litem and community stakeholders (providers, school counselors, DSS, etc.) on working with cases involving crossover youth with DSS and DJJ. In an effort to ensure that the individuals who serve dually-involved youth are aware of DJJ processes and alternatives, the Task Force will encourage that trainings include an overview and flowchart of the DJJ system, resource options for alternative placement, and trauma-informed presentations. In addition, the Task Force will request to review the current GAL training curriculums to identify any potential training gaps. (Recommendation 4.A)

5. Continue to provide, and expand upon, trainings focused on reducing stress and trauma to children who must testify in either, or both, Family Court and General Sessions Court. This includes coordination with SC Court Administration to provide training opportunities to the judiciary regarding developmentally appropriate, and legally defensible, courtrooms for child victims and/or witnesses appearing in court. The Task Force will expand the training audience of the already established child testimony trainings that took place during the last CJA cycle to include prosecutors and judges. The goals of these trainings will be to increase knowledge and understanding of how to seek remote/closed-circuit testimony; reduce stress and trauma for children who must testify whether remotely or in the courtroom; and to improve the preparation of the child for the courtroom experience. (Recommendation 5.A)

6. Support the Court Improvement Program to improve the quality of child abuse and neglect hearings by ensuring all necessary parties are served with notice of the hearing and that they are engaged and participate meaningfully in the proceedings; and by looking at causes for continuances and ways to alleviate those that are avoidable. The Task Force will collaborate with the Court Improvement Program to assist with any training needs that arise from their data collection. The Task Force will also request and review data from the Court Liaison Program and continue to explore ways to utilize the information that is collected to assist with system improvement. (Recommendation 6.A)

7. Develop and deliver a training curriculum for local multidisciplinary teams on the SC Child Abuse Response Protocol, modify the trainings for each county, and include schools in the MDTs. In response to newly enacted legislation that mandates the use of this protocol, the Task Force will collaborate with the SC Network of Children's Advocacy Centers to develop a curriculum that will be used to train all multidisciplinary partners on this best practice response to child abuse cases. (Recommendation 7.B)

8. Collaborate with the statewide Forensic Nurse Examiner Task Force to develop and implement tools that will expand and improve resources to handle the preliminary investigation of child sexual abuse. Members of the Task Force will be reaching out to the leadership of the Forensic Nurse Examiner Task Force (FNETF) to determine how they can support their efforts with a pediatric focus. Efforts will be made to

assist the FNETF plan a way to provide statewide service to children on a regional basis. (Recommendation 8.B)

9. Collaborate with the statewide Human Trafficking Task Force to identify and address gaps in resources that are needed to support suspected victims of sex trafficking along the process from identification to court. Members of the Task Force will be reaching out to the leadership of the SC Human Trafficking Task Force to determine how they can support their efforts with a focus on child victims and placement resources. The Task Force will also confer with DSS regarding service gaps for this population of children. (Recommendation 9.B)

10. Support the expansion of CAC involvement in the Safe Babies Court initiative in South Carolina and monitor the project to determine additional ways to support growth and success of Safe Babies Courts. The Safe Babies Court initiative is in the beginning stages of implementation through a one-year startup grant. The SC Network of Children's Advocacy Centers (SCNCAC) has applied for funding to continue the program. The Task Force will monitor this progress and communicate with the SCNCAC on how to support the program's success. (Recommendation 10.B)

11. Obtain and/or enhance protections in SC for recordings of forensic interviews of child abuse victims. Proposed legislation in prior sessions that detailed protections was unsuccessful in getting passed. Securing protections of these recordings may entail other attempts at legislation and encouraging statewide use of digital forensic systems that would limit the use of DVD hard copies. The Task Force will collaborate with the SCNCAC to remain apprised of developments in the use of technology systems by CACs that ensure confidentiality. (Recommendation 11.B)

12. Continue support of the SC Network of Children's Advocacy Centers, including organizational capacity and infrastructural resources: The CJA Task Force supports Children's Advocacy Centers and, together with the Children's Law Center, will assist their network, which is a state chapter of the National Children's Alliance. The Children's Law Center will continue to provide furnished office space for the Executive Director of the SC Network of Children's Advocacy Centers and three staff members, along with telephone, computer, office supplies, and use of equipment and meeting rooms. Additionally, the Children's Law Center will provide administrative support and will co-sponsor selected SCNCAC training events. Trainings will seek to improve adherence to the ChildFirst SC forensic interviewing protocol within the peer review system and increase opportunities for support and development for forensic interviewers. The Executive Director of the Network is the current chair of the Task Force and will report regularly on the status and needs of the state's Children's Advocacy Centers. The Children's Law Center will also assist individual Children's Advocacy Centers by providing legal information and training as requested. This support will promote the expansion of the Children's Advocacy Center approach throughout the state. (Recommendation 12.B)

13. Continue support of the operation of the Children's Law Center which is a training and information resource center for professionals involved in child

maltreatment proceedings. Operations include implementing the training recommendations in collaboration with the Task Force and providing research and logistical support to the Task Force: DSS contracts with the Children’s Law Center to support the functions of the Task Force and to operate a training and information resource center for professionals involved in child maltreatment proceedings. The Children’s Law Center is responsible for implementing the training recommendations in collaboration with the Task Force, preparing resource materials as directed by the Task Force, and assisting with accomplishment of policy recommendations. The Children’s Law Center provides research and logistical support for all meetings of the Task Force and its committees. Supporting the operation of the SC Children’s Law Center promotes successful delivery of coordinated and effective training and information for professionals involved in the response to child abuse allegations, investigations, and prosecutions. Measurable outcome goals of training will be identified and tracked to assess and modify any trainings. (Recommendation 13.B)

14. Provide support for any child abuse legislation that the Task Force deems will improve the state’s response to abused and neglected children including the commercial sex trafficking of children: The Task Force will monitor and support legislation that will improve the state’s response to abused and neglected children and that is related to CJA topics. Particular attention will be paid to efforts to further protect child sex trafficking victims. Members provide input about such legislation when there is appropriate opportunity. The Task Force will also assist in efforts to educate child serving professionals to make them aware of the passage of any applicable legislation during the CJA cycle. (Recommendation 14.C)

15. Investigate the feasibility of integrating data systems that would allow for a comprehensive collaborative database that would track child abuse cases from initial referral through closure of services. In addition, investigate data sets that are already available in order to measure positive outcomes into adulthood. The Task Force will convene an advisory group made up of Task Force members but also other professionals from key agencies to begin to identify current data problems and to address the possibility of a combined data system. (Recommendation 15.C)

16. Encourage child serving agency examination of racial disparities of children involved with the child welfare system. The Task Force will begin to examine current efforts in the state that are addressing this issue. It will also promote further identified practices that remove correlations between a child’s racial identity and their contact/experience with the child welfare system. This may include addressing biases in making reports of abuse. (Recommendation 16.C)

ATTACHMENT

2021 CJA Partner Agencies/Groups: Summary of Initiatives/Priorities that fall within CJA Parameters

SC Guardian ad Litem Program

- Increase volunteers so all children will have an appointed GAL
- Recruit and retain staff and improve staff's ability to actively recruit volunteers
- Provide additional support for volunteers and the court system
- Increase the number of intermediate/advanced training hours, peer support, and coaching for volunteer GALs

Richland County CASA

- Ensure that every child involved with Richland County DSS has a voice
- Ensure that the child is represented, through the CASA GAL, in every aspect authorized

SC Network of Children's Advocacy Centers

- Secure a legislative mandate for the statewide child abuse response protocol
- Develop and deliver a training curriculum for local multidisciplinary teams on the new statewide protocol
- Obtain protections in SC for recordings of forensic interviews of child abuse victims
- Secure financial support from SC for Children's Advocacy Center collaborative services with Law Enforcement and DSS
- Expand CAC involvement in the Safe Baby Courts initiative in South Carolina

SC Department of Education, Office of Special Education Services

- Promote school policies and practices that will meet the social emotional and developmental needs of children with disabilities pre-school to age 21
- Foster collaboration between general and special educators in meeting the social emotional needs of all children within our state
- Serve children with disabilities experiencing or who have experienced traumatic events

SC Department of Social Services

- Roll Out Guiding Principle Standards Practice Model and Coaching Model
- PIP Change and Implementation, Ongoing Evaluation and Monitoring (through August 2021)
- Implement Prevention Services (Families First Prevention Services Act)
- Implement long-term CQI Strategies
- Proof of Concept: Thriving Families (shifting from a child welfare system to a child health and well-being system)

SC Department of Social Services –Child Fatality Division

- Identify and bridge gaps in the system with new review process for child fatality cases
- Apply the information gained from these reviews to the SCDSS child welfare system
- Become the data holder for the state for the National Center for Fatality Review and Prevention's Case Reporting System
- Support the growth of a uniform and effective child death review process across the state

SLED - Child Fatality Unit

- Continue training and implementing Child Death Investigation Task Forces (CDITF) across the state
- Ensure compliance with SC Code § 63-11-1900, which mandates that all child death investigations are accurate, thorough, and complete, and that the best approach is multi-disciplinary and multi-agency

SC Department of Children's Advocacy

- Joint trainings to improve access and awareness to services
- Coordination of services
- Collaboration with child-serving partners including improvement of court hearing timeliness and outcomes for children/families
- Training for GALs and Foster Care Review Board (FCRB) regarding legislative updates and data trends
- Provide information to the public regarding resources available for prevention and treatment

Foster Care Review Board

- Promote safe and permanent homes for children in foster care, and to do so without unnecessary delay

Court Improvement Program and Court Liaison Program

- Improve the quality of child abuse and neglect hearings by ensuring all necessary parties are served with notice of the hearing and that they are engaged and participate meaningfully in the proceedings
- Provide training to improve reasonable efforts inquiries by judges and by parent attorneys during court proceedings
- Improve court liaison data collection, analysis, and presentation in reports to stakeholders

SC Department of Juvenile Justice

- Work with DSS to strengthen interagency communication and to improve outcomes for crossover youth, particularly victims of human trafficking and youth at risk of victimization.
- Use the results of the Children's Law Center's data analysis on a subset of youth victims of human trafficking to develop strategies to better serve this population.

Joint Citizens and Legislative Committee on Children (JCLCC) Legislative Initiatives

Child Welfare Issues:

- **Kinship/Fictive Kin – [H.3214](#) / [S.222](#)**
Defines "fictive kin" and provides that fictive kin are eligible to be foster parents under the kinship foster care program.
- **Child Abuse Protocol – [H.3209](#) / [S.229](#)**
South Carolina Child Abuse Response Protocol Act: Requires multidisciplinary teams involved in child abuse investigation and prosecution to follow the protocol.
- **Extension of Foster Care to 21 – [H.3509](#) / [S.221](#)**
Establishes an extended foster care program and related procedures to enable certain children in the custody of DSS on their eighteenth birthday to continue to receive services and supports from the department until the age of twenty-one.
- **Family First Implementation – [H.3567](#) / [S. 441](#)**
Would bring South Carolina into conformity with the federal Family First Act passed in 2018. It adds a definition in the Children's Code for "Qualified Residential Treatment Program;" amends sections relating to investigations of institutional abuse and restrictions on foster care placements; requires assessment, case planning, and judicial review for children placed in qualified residential treatment programs; and amends sections relating to permanency planning.

Crimes Against Children Issues:

- **Trafficking:**
 - **Sex Buyer Penalties – [H.3224](#) / [S.224](#)**
Increases the penalties for solicitation of prostitution, establishing or keeping a brothel or house of prostitution, or causing or inducing another to participate in prostitution. Establishes the affirmative defense of being a victim of human trafficking.
 - **Safe Harbor for Minor Victims – [S.230](#)**
Provides that minors engaged in commercial sexual activity or trafficking are presumed to be doing so under coercion or as the result of a reasonable fear of a threat. Provides an affirmative defense of these victims and for expungement for these victims.
- **Intimate Partner Violence – [H.3210](#)**
Amends the Protection from Domestic Abuse Act to revise the definition of "household member" to include persons presently or formerly in a dating relationship and to define "dating relationship."

Bench-Bar Committee Initiatives:

- Continue to review and advise the Court Improvement Program, including defining the CIP Quality Legal Representation requirement for the upcoming grant application for fiscal year 2021.
- Monitor the direction and progress of the statewide implementation of the Pre-Merits Hearing Conferences led by the SC Department of Social Services, an effort to reduce the number of days to completed merits hearings, and to assess alternatives to foster care for children who have been removed.

Desired recommendations for system improvements

- Legislation expanding the role of a GAL, to include advocating for all children with DSS involvement, even if there is no court action
- Legislative mandate of the South Carolina Child Abuse Response Protocol
- Expand state-wide training(s) (e.g., educators, staff, and related service personnel) on recognizing signs of abuse and neglect within virtual settings and students with disabilities in particular
- Collaboration and engagement with service providers and community partners in efforts to reform the child welfare system
- Continued statewide training on concepts and statutory guidelines for child death investigations and encouragement for all agencies to utilize SLED's Child Death Investigation Task Forces for all child deaths
- CJA could be part of making recommendations regarding Family First Prevention Services Act (FFPSA) implementation efforts and provide training and awareness about them
- Have a vigorous policy of pursuing criminal charges for all cases of substantiated sexual and severe physical abuse
- Child serving agencies should work collaboratively to develop a cohesive strategy for serving child victims of human trafficking and address service gaps