March 30, 2018

The Office of the Child Advocate is submitting the following written testimony in response to the proposed changes submitted by the Department of Children, Youth and Families to the Rhode Island Training School Regulations, 214-RICR-60-00-1 and the repeal of numerous existing regulations. In response, the Office of the Child Advocate would like to recommend the following changes to the proposed regulations.

1.10.C.3b Clinical Services

Recommended Change: The Office of the Child Advocate would recommend language be added to this policy similar to the language set for in the policy relating to Strip Searches, Section 1.15.5, “...in the case of a transgender or intersex identified youth, by a staff member of the gender that a youth has identified as the preferred gender for this purpose.”

1.10.G.2.b Clinical Services

Recommended Change: Specify who would be considered “Medically trained personnel” or a “qualified staff” for clarity within this policy.

Thank you for the opportunity to provide feedback regarding the proposed regulations. Please do not hesitate to contact us with any questions (401) 462-4300.

Sincerely,

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Child Advocate

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