

Many saw the case as a victory for women's rights. Whereas child protection authorities had argued in court that "women were at fault for 'engaging' in domestic violence," defenders saw the decision as recognition by the courts that battered women do not engage in domestic violence; they are victims of it (Nowling, 2003, p. 526). The word *engage* requires the consent and effort of both parties to actively participate in an activity. The dynamics of domestic violence clearly show that the victim does not actively participate in the abuse and certainly does not consent to it. Defenders of children, on the other hand, criticized the decision, arguing that the courts had not adequately addressed the problems associated with children who witness this violence as "they are victims in this situation whose rights must be protected and whose safety must be a primary concern of the courts" (Nowling, 2003, p. 526).

Defining exposure to IPV as child maltreatment involves complex issues that require greater knowledge than is currently available, particularly with regard to possible legal statutes that might be affected (L. Harris, 2010). Rather than defining all cases of exposure to IPV as child abuse, legislators and others may find it more useful to consider the specific circumstances under which exposure should be defined as criminal child abuse. Edleson (2004) urges a reasoned approach on reaching this balance, arguing that three tenets should guide the discussion: First, exposure should not be automatically defined as child maltreatment, because it would be counterproductive to define child maltreatment too broadly. Second, many families would benefit from voluntary, community-based intervention programs. Finally, some children exposed to IPV should be referred to CPS.

Recent years have seen a number of gains in terms of furthering research linking IPV exposure and child maltreatment and increasing collaboration between domestic violence and child abuse programs, between battered-women advocates and CPS workers, and between researchers and practitioners (Edleson & Malik, 2008; Hartley, 2012a; Lessard & Alvarez-Lizotte, 2015; Postmus & Ortega, 2005). Although progress in coordinating the efforts of both these fields is growing, greater collaborative efforts are needed. In addition, further research is needed to determine what conceptualization of the relationship between IPV and child maltreatment will best serve children exposed to such violence.