Dear Members of the Governor's Task Force on the Protection of Children:

Eric Dean's untimely and tragic death may have been a catalyst for the media to shed light on the flawed system of Child Protective Services in the State of Minnesota, but for those working with abused and maltreated youth, the story of Eric Dean is all too common. Countless reports are made to Child Protective Services every day that are not investigated due to lack of resources, as case workers are routinely assigned caseloads too large to support interventions for anything but the most egregious abuse allegations.

The members of the Minnesota Society for Clinical Social Work have a vested interest in the outcomes of the Task Force. In response to your request for public comment, we respectfully submit our concerns with regard to the current protocols guiding Child Protective Services and our support for changes to the protocols for Maltreatment Reporting, Assessments, and Investigation.

Our first concern is the misuse of the title "Social Worker". Some county workers who are being titled Social Workers are not, in fact, licensed social workers. This is problematic on a few levels. First, individuals are being hired to perform social work interventions without adequate training in this skill set. A Bachelor of Arts in the Humanities provides a very different training experience than a Bachelor of Science in Social Work. This variance in training, licensure, and supervision leads to inconsistent care for clients and inconsistent oversight for service providers. Second, calling county workers "Social Workers" when they are not sends misinformation to the mandated reporters, victims, and families who are reaching out to CPS for support. We support the proposal that CPS "Social Workers" must be licensed social workers and recommend that providers from other professional backgrounds who are performing intake or case management tasks be assigned a different title.

Our second concern is lack of consistency in the manner in which CPS cases are handled from one county to another. In some counties, caseloads are too high to investigate anything but the most egregious abuse allegation. When an investigation does take place, out-of-home placement is often discouraged due to the financial burden it puts on the state. How can the state intervene in the most appropriate, ethical way if CPS workers are only able to offer resources and support to the most violently abused or neglected children? Where are the ethics in determining support based on state funding rather than the needs of mistreated children?

The Minnesota Society for Clinical Social work is also concerned about several other areas, including the lack of ongoing professional development and support for County Supervisors, the isolation of workers in greater Minnesota, the lack of investigation of sexual abuse cases, and the funneling of the highest level cases to other state and county organizations that are not qualified to assist families with high needs.

Child Protective Services is a system that has been in need of critical review and repair for some time. A Task Force is a way to begin that process. We hope it is not the end. The Minnesota Society for Clinical Social Work supports ongoing assessment and protocol revisions to Child Protective Services in a manner that will adequately serve and protect Minnesota children.

Sincerely, Jenny Andersen, LGSW, MSCW Board Member On behalf of the Minnesota Society for Clinical Social Work