



CATHOLIC CHARITIES  
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Governor Mark Dayton's Task Force  
On the Protection of Children  
MN Department of Human Services  
St. Paul, MN

Dear Task Force Members:

On behalf of Catholic Charities of St. Paul and Minneapolis, we wish to extend our thanks to Governor Dayton for creating this Task Force and appreciate the time and commitment you have made to participate in this very important discussion.

Catholic Charities has been involved with children and youth in the child welfare system since our inception 145 years ago. In the past year alone, our staff at St. Joseph's Home for Children in Minneapolis provided assistance to over 1,100 children and youth in child protection shelter intake in collaboration with Hennepin County. Additionally, staff in our parenting programs has provided over 1,000 home visits to at-risk families throughout Hennepin County. Given these experiences and our mission, which calls on us to advocate for the needs of children and disenfranchised families, we appreciate the opportunity to respond to the Task Force's request for public input.

Our responses to select Task Force questions are based on the expertise of our many direct service staff and leaders who have worked with child protection intake and emergency shelter services on behalf of a number of counties and are informed by conversations with youth every day.

**Question I-a: How should Minnesota strengthen quality and consistency in screening reports of child abuse?**

As the recent report by the State Auditor made clear, the working definitions of child maltreatment vary considerably across the state. Intake criteria and processes are well-documented as the first points of variation across systems. County-level variations in working with screened-in children and families are also a concern. While we do not know that simply creating a statewide child protection intake system would solve these issues it may offer additional consistency. What's critical is that the State be clear about the incentives it creates, direct or indirect, with any potential solution regarding screening. If the only choices are to remove or not remove a child, the system cannot support other alternatives that may be more conducive to child and family well-being. Nonetheless, we urge the Task Force to recommend efforts to increase the predictability and reliability of response to allegations of maltreatment across the State of Minnesota.

**Question I-j: What are your suggestions to support mandated reporters in assuring that child abuse/neglect reports are not influenced by poverty and race?**

Neglect is the most common screened-in allegation across Minnesota. It is close to impossible to adequately provide for one's family when living in poverty. This is particularly the case for the nearly 44% of Minnesotans living in "deep poverty," i.e., on incomes less than half the federal poverty threshold. By last year's definition, this would mean that a single mother and two children were living on less than \$9,385 a year.

We recommend that the State be more explicit in calling out a desire to prevent poverty alone from causing a parent or other caregiver to be found negligent and to have responses to the issues of poverty available as alternatives to child protection. The definition of neglect in Wisconsin is very clear in this regard and offers guidance.<sup>1</sup>

**II-c: What are your suggestions for improving families' ease of access to high quality culturally-effective services and resources?**

We advise the Task Force to look across community systems to identify where programs designed by other systems have positive impacts on culturally specific populations. For instance, Visiting Nurse programs have been shown to reduce family stress and increase parental competence, which are key predictors of child safety. These community-based providers tend to be highly competent in working with the beliefs and practices of the families and communities with which they work.

We also need to look to communities of color for strengths inherent in these communities to support families, such as familial clans, fictive kin, and faith communities. These natural supports to families are often willing to be more flexible and creative in problem solving to keep children safe and meet families' basic needs.

Counties and other providers need access to identified culturally-specific providers or advisors who could be consulted in child protection cases where a worker or supervisor is questioning the role of culture or bias in the case. These advisors could be vital in preventing an unneeded removal and helping the worker to identify other culturally-appropriate interventions.

**III-c: What kind of educational background and/or training should Child Protection workers have before they start working in Child Protection?**

In addition to hiring more diverse staff, there is a clear need for additional cultural competence training for current child protection workers as well as ability to get feedback on how cultural competence is practiced in real situations. Cross-cultural communication, cultural parenting practices, and religious and cultural beliefs all must be taken into consideration when making a quality child protection decision. We recognize this challenge within our own organization and believe it an important requirement for us, child protection workers and others working with system-involved families as well (e.g., social service providers, law enforcement, court system, etc).

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<sup>1</sup> Wisconsin Statute Chapter 48.02 (12g): "Neglect means failure, refusal or inability on the part of a caregiver, for reasons other than poverty, to provide necessary care, food, clothing, medical or dental care or shelter so as to seriously endanger the physical health of the child."

**III-e: What are your recommendations for improving outcomes for children and families by enhancing Minnesota’s child welfare system?**

We know from years of experience that being removed from one’s family is traumatic for a child. The pain of this experience often leads children to exhibit behavior that is misidentified as “oppositional” or warranting juvenile justice involvement. We fear that, too often, entering the child protection system leads to additional and deeper juvenile systems involvement. We believe this progression has serious and long-lasting adult consequences.

We encourage the Task Force to rethink the current system that leaves decisions on 72 hour holds solely to law enforcement. We greatly appreciate the work of law enforcement and the safety they are able to provide in very difficult circumstances. At the same time, child protection is not a primary responsibility for law enforcement personnel, who often lack the training to distinguish between child maltreatment and poverty, mental illness or chemical dependency, or other factors related to familial fragility.

For example, what may appear to law enforcement as an adversarial adult may actually be a loving parent trying to prevent the removal of their children, particularly when the officer and parent come from different racial, ethnic, socioeconomic, or cultural backgrounds. We know, through our current work in child protection intake, that within a given year, almost 70% of youth removed via a police hold are returned home within 72 hours.

We ask the Task Force to establish mechanisms that allow social workers, trained in child protection, to be involved in this decision. This would provide a resource for law enforcement, as social workers should be more aware of family cultural issues and of community resources available to assist the family if removal isn’t warranted.

**III-b: What types of services are available in your area that are working to keep children safe and strengthen families?**

We once again recommend the Task Force look across public systems and encourage a higher investment in early childhood education centers. Centers such as Catholic Charities’ Northside Child Development Center (NCDC) provide so much more than child care. These centers often provide parent support, parent education, and monitoring that ensures proper reporting of child protection concerns. Unfortunately waiting lists for early childhood education funding are extremely long in many counties. Families that could most benefit from the stability and support provided by these centers can least afford to enroll their children. We encourage the Task Force to call for adequately funding early childhood education, including the Child Care Assistance Program (CCAP).

**V-a: What would it look like if the Child Protection system was more transparent?**

Catholic Charities recommends continued public and additional transparency in the reporting and disposition of abuse and neglect allegations statewide. Creating a Children’s Ombudsperson at the State level, who would report to the Governor, like the Ombudspersons for Mental Health or Developmental Disabilities and Families is an additional option. This would be a resource for all members of the public, be they involved in child protection or simply concerned citizens to address their concerns to a neutral party. It is critical to maintain the independence of the Ombudsperson from both the Department of Human Services and the individual and collective counties. The Children’s Ombudsperson would work closely with Ombudspersons representing diverse communities of color.

Thank you for accepting our written input. We welcome the high level focus on Minnesota's Child Protection systems and we know that, working together, we can make changes that benefit our children, the future leaders of our state.

Sincerely,

*Keith Kozerski*

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cc: Governor Mark Dayton  
Human Services Commissioner Lucinda Jesson  
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