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Governor Scott Walker  
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Division of Safety and Permanence

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April 19, 2016

Sheryl Herberg, CRP Coordinator  
James Allison, CRP Coordinator  
St. Croix County Citizen Review Panel  
St. Croix County Department of Health & Human Services  
1752 Dorset Lane  
New Richmond, WI 54017

Dear Ms. Herberg and Mr. Allison:

Thank you for the timely submission of the 2015 St. Croix County Citizen Review Panel report to the Division of Safety and Permanence (DSP) in compliance with the Federal Child Abuse Prevention and Treatment Act.

The citizen review panel submitted two recommendations to improve child protection services at the state level. A brief summarized statement of each recommendation and the Department of Children and Families (DCF) Division of Safety and Permanence (DSP) response follows:

- 1. The panel asks that more consideration be given to the location of state sponsored trainings to better accommodate the western and northern regions of the state.*

Training for child welfare workers throughout the state is provided by the Wisconsin Child Welfare Professional Development System (WPDS) under contract with DCF. The WPDS has recently undergone a reorganization which is designed to improve the quality and accessibility of training. Under the new model, attention will be given to scheduling trainings at locations that are accessible and convenient to workers planning to take the training.

Additionally, more information is forthcoming about the Public Child Welfare Conference scheduled for October 11-12, 2016 in Wisconsin Dells. The conference planning committee has attempted to select a site that is more central in the state to make it more convenient for child welfare staff from all areas to attend.

- 2. The panel recommends a review and clarification of statutes pertaining to child abuse and neglect. The panel is concerned about the vagueness of language used in determining the substantiation of abuse and neglect, leaving much up to interpretation.*

CPS workers in Wisconsin are guided by both statute and the CPS Standards. The CPS Standards provide clarification and guidance to operationalize statutory requirements and definitions to help ensure that workers have a clear understanding of how they go about gathering the information needed to determine if abuse or neglect occurred and if the child is safe or unsafe.

The Wisconsin Children's Code outlines the county's responsibilities in regards to child abuse and neglect investigations with the qualification *preponderance of the evidence*, as the guidance provided regarding how to make the determination of abuse and/or neglect. The definition of *preponderance of the evidence* provided in case law is that "the fact finder must be satisfied to a reasonable certainty by the greater weight of the credible evidence".

The Wisconsin CPS Access and Initial Assessment Standards provide a thorough guide for CPS workers to follow when considering a substantiation finding. The CPS Standards operationalize the phrase *preponderance of the evidence* by asking workers to determine if the information they gathered is 1) credible: trustworthy, believable and/or dependable; and 2) persuasive: more likely that the abuse/neglect occurred, than not. The CPS Standards then guide workers through each category of maltreatment, providing workers with a thorough definition and description of each category of abuse/neglect and the elements that may or may not lead the worker to a substantiation decision.

In addition, CPS staff must complete pre-service training, as required in administrative rule (DCF 43) prior to beginning work. Workers are also guided by direct supervision, job shadowing, and other on the job training. In addition, workers must complete 15 days of foundation training within the first two years of work, which focuses on skill development in key areas of CPS work to provide consistency and equity in the application of best practice across all 72 Wisconsin counties.

I hope you find this response to your recommendations helpful. Thank you for your dedication and efforts on behalf of Wisconsin children and families.

Sincerely,

A handwritten signature in cursive script that reads "Fredi-Ellen Bove".

Fredi-Ellen Bove  
Division Administrator

CC: Fred Johnson, Director  
St. Croix County Department of Health & Human Services