At the October 20, 2005, meeting of the Interim Committee in which several panels described the child protective services system, several workforce issues were identified as important and needing more information in relation to the child protective services workers in the Child and Family Services Division (CFSD) of the Department of Public Health and Human Services (DPHHS). The panel members, the public, and the committee members raised issues of qualifications, training, compensation, recruitment and retention, proposals for licensure, standards, and accountability. This report is intended to give an overview of some of the issues and present some options for consideration.

Qualifications

Community social workers and family resource specialists compose 62% of the regional staff. Regional staff is approximately 82% of the division staff with centralized intake and central office staff composing the remaining 18%. The following qualifications were taken from job descriptions used by the CFSD to recruit staff into various positions.

**Community social worker:** Duties include performing professional social work in providing protective services to children who are being abused, exploited, or neglected. This position investigates referrals, counsels, develops treatment plans, coordinates work with other programs, and researches other available services. These cases are likely to involve legal action, thus there would be time spent working with law enforcement, county attorneys, and the courts. On-call crisis intervention and information and referral are also routine to this position. Requires a valid driver’s license and access to a vehicle as travel is required. Some positions state that the position may be on call 24 hours a day to provide services in emergency situations and that regular shifts may include nights and weekends.

Qualifications are bachelor's or master's degree in social work OR bachelor's or master's degree in related human services field AND 1 year related human services experience OR bachelor's or master's degree in an unrelated field AND 2 years related human services experience. Minimum
qualification is a bachelor's degree. Current degrees that are considered related human services include human services, sociology, psychology, child development, family relations, etc.

**Family resource specialist (FRS):** Duties include licensing and training foster families, assessing families for adoption, and investigating complaints in foster and adoptive home setting. The position case manages adoptive home placements until the child is legally adopted by a family; helps families who have adopted children to find services needed for their children beyond the finalization of the adoption; and may also facilitate support group meetings for foster and adoptive families.

Qualifications are a bachelor's degree in social work or a closely related filed AND 2 years of social work preferably in protective services, adoption, or licensing foster families. Other related human service experience will be considered on a case-by-case basis.

Other positions within the department include: centralized intake social worker and supervisor (18 FTE), social work supervisor (32 FTE), case aide (12.88 FTE), social services aide (1.0 FTE), family group decision-making (FGDM) coordinator and permanency planning specialists (12 FTE). Job profiles for these positions will be forthcoming.

Testimony from the Director, Family Support Network in Billings, an in-home services provider, indicated that the workers she employs are not social workers, they are certified as family support specialists through the University of Iowa. The director is becoming certified as a trainer and will be able to train employees once certified.1

**Training**

*Division training:* Following is a summary of division training opportunities from information provided by CFSD. For a more complete review of the training unit, specific training requirements, and curriculum, please refer to Appendix A.

The Child and Family Services Division has a training unit and provides training in various formats to new workers and long-term workers and includes:

- Social worker and family resource specialist new worker orientation
- Montana Child Abuse and Neglect (MCAN) training
• Montana Statewide Computer Information System training in CAPS
• Forensic interviewing training
• Policy training
• Supervisor training and meetings regularly for Community Social Worker Supervisors
• Health Information Privacy and Accountability Act (HIPAA) training
• Family Resource Specialist training
• Support staff training
• American Human Association Family Group Decision-Making training

The MCAN training is the main training specific to child protective services and is a 2-week, 64-hour course presented 4 times a year for all new social workers, supervisors, case aides, and family resource specialists to be attended within 3 months of hire. The curriculum is found in Appendix A and covers specific aspects related to child protective services, abuse and neglect, and investigations specific to Montana law and practice and in the general field. It includes information on social worker ethics and information from the National Association of Social Work and the Child Welfare League of America. Trainers are from within the CFSD and other entities outside the division such as the court system and the university system.

Other training which is provided to both local CFSD employees and to outside entities includes:
• Indian Child Welfare Act (ICWA) training on request from the ICWA specialist and provided to law students, Tribal members, local organizations, and local CFSD Office
• Guardian Ad Litem training, as required by federal law
• Preservice and ongoing training for foster, adoptive, and kinship family training
• Independent living training
• Foster Care Review Committee training
• Annual Prevent Child Abuse and Neglect Conference
• Annual Foster/Adoptive/Kinship Care Conference
• Indian Child and Family Conference

_Potential Training Proposals:_ There are currently discussions in the CFSD about developing a Training Institute in collaboration with the University of Montana to train and support services to field staff and community agencies, and there is a proposal for case aid training and discussion regarding development of a phased training in 2 or 3 phases to provide basic, intermediate, and
advance training over a longer period of time.

*Academic training in state:* For academic training specific to social work, Montana has two Bachelor's of Social Work programs -- at the University of Montana-Missoula (UM), which is accredited, and at Salish Kootenai College in Pablo, which is in candidacy for accreditation by the Council on Social Work Education. There is one Master's of Social Work (MSW) programs accredited in Montana, at the University of Montana at Missoula. The Walla Walla College Graduate School of Social Work runs extension programs in Pablo and Billings and is accredited through the State of Washington.

Information from the Montana Department of Labor indicates for 2003 for Bachelor's of Social Work (BSW) there were 3 graduates from Carroll College (program no longer exists because of the demands of accreditation) and 55 graduates from the University of Montana. There were also 19 graduates from Tribal Colleges who received an associate's degree. In 2004, there were 34 graduates with a bachelor's degree and 14 graduates with a Master's of Social Work.

Ryan Tolleson Knee, Ph.D., Professor of Social Work from the University of Montana, indicates that UM:

graduates approximately 45 BSW and 23 MSW students annually. Both undergraduate and graduate students take courses in the areas of human development, social policy, research, and practice with individuals, families, groups, and communities. We offer elective courses that both undergraduates and graduates can take that either directly or indirectly address content related to child and family service work. These elective courses include: Child Abuse and Neglect, Ethics, Youth at Risk, Social Work and the Law, Addiction Studies, and Rural Mental Health. Elective Courses offered only at the graduate level that relate to child and family service work include: DSM and Psychopathology, Couple and Family Counseling, and Advanced Counseling Skills. Students who are interested in children, youth, and families typically enroll in these elective courses and may or may not complete a practicum at Child and Family Services [Division].

The curricula of the various schools of social work are not specific solely to child welfare or child protective services but support a generalist approach and include relevant electives. At UM, the second year of the MSW program is the concentration year and allows individuals to develop their own learning plan. Walla Walla College's program has a clinical focus. A report from the Child Welfare Institute asks whether a social work degree, either BSW or MSW, truly
provides an education that is specialized in child welfare. The Council on Social Work Education does not require that schools of social work teach a core set of skills but a core set of knowledge. "Social work education itself cannot recruit enough persons interested in child welfare to even approximate the workforce need." A 2005 NASW report on workforce needs reported only 13% of licensed social workers work in the area of child welfare and family. This may be due in part to the majority of states that exempt state agency social workers from licensure.

**Joint federally funded stipend programs:** The Child and Family Services Division currently has a contract with both Salish Kootenai College and the University of Montana under which a student, bachelor's or master's, may receive a stipend if the student takes classes in a child protective services track and commits to working for the agency. The UM program states its purpose is to train students to understand the needs of high-risk children and their families and to cultivate a set of skills to meet their needs. The program requires students to complete courses designed for CPS workers, complete a practicum with DPHHS, and to work for the department after graduation. The program is federally funded through Title IV-E funding. Students receive an annual stipend of $5,000 and owe the state 1 or 2 years of full-time employment depending on how many years the stipend is received. Ms. Brown reported that the UM program has a difficult time recruiting for the stipend program (2-3 per year) and of the 12 MSW stipend recipients who have fulfilled their obligation, 8 have left the agency.

There is a second Child Welfare Partnership Program, also under federal Title IV-E funding, designed to provide advanced graduate training to employees who have worked for the Child and Family Services Division for 5 years. As a student, the employee receives a stipend and is required to work for the division for 2 years for every year the stipend is received.

Ryan Tolleson Knee, Ph.D., Professor of Social Work from the University of Montana, reports that:

> Students enrolled in the Title IV-E Child Welfare Training Program must take Child Abuse and Neglect, Youth at Risk, Social Work and the Law, one of the other listed courses and must complete their practicum at Child and Family Services and complete MCAN training. These students are more specifically trained in child welfare work and have committed to enter this area of practice following graduation. ...[T]he students who were trained through the IV-E program tend to be retained for longer periods of time. One of our greatest challenges is getting students interested in relocating to the central or eastern
portions of Montana. The IV-E students that we've been most successful in placing outside of western Montana are those who are from other parts of the state and hope to return to their families following graduation. A number of students, however, are interested in social work and learn more generally about social work practice and complete an alternative practicum. Interestingly, these students frequently find themselves working for Child and Family Services following graduation.5

OPTIONS

1. Support or require the CFSD to prepare a proposal for a training institute and to develop additional phases of training for intermediate and advance professional development.

2. Review the requirements of the federal Title IV-E-funded stipend programs. The requirements for the Child Welfare Partnership Program may be restrictive (5-year requirement, 2 for 1 payback) and a comparison should be made with other states to determine the cost and benefits of the program for the students and for the department and whether loosening the requirements may provide more opportunities. The 5-year requirement in combination with short tenure may mean that the potential candidates leave before they ever qualify for a program that might be the incentive for them to stay.

Compensation, Recruitment, and Retention

Numbers and compensation. The U.S. Bureau of Labor Statistics website for Montana reports 980 persons in Montana employed as "child, family, and school social workers". The mean annual income is $32,640, which compares to the national mean annual salary of $38,280. The CFSD community social worker position starts at $31,085 which is slightly below the national 50th percentile of $35,010 and above the 25th percentile of $28,520. The family resource specialist position starts at $28,397, below the 25th percentile. There are also 750 social workers reported in the state in other areas such as medical and public health, mental health and substance abuse, and all others.

The total numbers of persons classified as social workers for labor statistics purposes of 1,430 persons compares to 454 persons licensed in Montana by the Board of Social Work Examiners and Professional Counselors as "licensed social workers" or "licensed clinical social workers", which requires a master's degree. It is assumed that the remainder have a lesser or different related degree or could be a graduate from a nonaccredited school which precludes licensure.
The NASW reports that the estimated median annual salary for (licensed) social workers employed full time in the social work profession in the children and families practice area is $45,748 compared to $47,689 for all social workers.⁶

**Recruitment and Retention.** In the Child and Family Services Division, 69% of the degreed staff had a degree in a related area, and the department does provide a hiring preference for applicants with social work degrees. The division has experienced a turnover rate averaging about 22% for social workers and 15% for all staff from 2002 to 2004. The GAO report estimated the turnover of child welfare staff annually nationally at 30% to 40%, with average tenure of less than 2 years.⁷

The federal General Accounting Office (GAO) reported that holding a degree in social work (BSW or MSW) correlates with higher job performance and lower turnover rates. The causes of caseworker turnover from a study of 27 states were found to be low pay, risk of violence, staff shortages, high caseloads, administrative burdens, inadequate supervision, and inadequate training⁸. Some of the practices to improve recruitment and retention include: university training partnerships, accreditation, leadership and mentoring programs, competency-based interviews, and recruitment bonuses. Montana has implemented a university training partnership with the University of Montana (see Training). Only two states have fully accredited child welfare systems, Illinois and Kentucky, and have reported improved attractiveness to applicants and enhanced worker morale and performance, two factors critical to retention.

The Council on Accreditation for Children and Family Services specific standards relate to maximum caseload size, supervisor-to-staff ratios, and professional credentials for caseworkers and supervisors. While accreditation may be highly valuable, accreditation can be expensive and filling vacancies to maintain rigorous caseloads places a constant demand on resources. Current caseloads, vacancy rates, turnover, and personnel standards may preclude agencies from pursuing and becoming accredited. The CFSD has instituted many changes in response to the federal reviews and may need time to stabilize before any additional burdens in this area are imposed if the cost to the system would outweigh the benefits. Nevertheless, the types of standards that are required for accreditation should provide information to the committee and to the department on areas to look for improvement, especially in light of information from the federal reviews.
The National Association of Social Workers is the professional association for professional social workers. They have a membership of 546 in Montana. Members must have at least a Bachelor's of Social Work or be employed in a social work capacity (associate membership). In a NASW study of the 8% of their members who specialize in child welfare, 75% had MSWs compared to 97% of the regular membership and 25% have BSWs. Key findings of their study indicate that social workers in child welfare are more satisfied with their jobs than the general population of child welfare workers and that the most challenging and most satisfying aspects of the work were the issues and successes confronting the families.\textsuperscript{9}

In the preliminary report\textsuperscript{10} of a national study of licensed social workers, the NASW reported that "Nearly 30% of social workers are over 55 years of age, compared with 14% of the U.S. civilian labor force. ... Replacement of these experienced professionals as they retire will place significant burdens on social work education programs in coming years." The average age reported for social workers in the children and families practice area is somewhat lower at 46 years of age. This refers to replacement of licensed social workers and may indicate that if capacity is not sufficient to replace current licensed social workers, there may not be enough capacity to educate child protective service workers who do not have a social work degree.

OPTIONS

1. Request additional information on methods addressing low pay, risk of violence, high caseloads, and administrative burdens, such as leadership and mentoring, competency-based interviews, and recruitment bonuses.
2. Compare information from the Child and Family Services Review to various standards on caseload, supervisor-to-staff ratios, and professional credentials.

Licensure

Clinical Social Workers have been licensed in Montana since 1983 by the Board of Social Work Examiners and Professional Counselors (HB 284, Ch. 544, L. 1983). The sponsor, Rep. Cal Winslow, stated that one of the reasons that the bill was offered was to allow social workers with a master's degree to bill for insurance when in private practice. Social workers were considered one of the main mental health practitioners, but the only ones unlicensed. At that time, the only time third-party reimbursement was available was when they worked for mental health centers. Other proponents framed it as a public safety issue protecting the public, especially the elderly in
a growing hospice movement, and they desired a stringent code of ethics, performance standards, and protection for privileged communications. The statement of intent providing guidance to the board for adopting rules stated the intent to be rules that protect the public from abuse of trust, to regulate the day-to-day practice, fees, testing devices, and counseling techniques, and to ensure professionalism. An exhibit from the NASW noted that most social workers up to that point had been employed by public or private agencies, but because of the growing number in private or independent practice, suits for malpractice had been increasing. NASW also noted in the Senate Public Health Committee that the reason state agencies were not included in the bill was the quality control in their work is covered under agency policy and through supervision. They also noted that the agency workers are more likely to work on environmental change than the internal matters, feelings, and developmental issues on which master's social workers work.

The requirements for licensure are in statute at 37-22-301, MCA:

- a doctorate or master's degree in social work;
- 24 months of supervised post-master's degree work experience in psychotherapy\(^1\) including 3,000 hours of social work experience within the past 5 years (of which 1,500 hours were in direct client contact); and
- compliance with social work ethical standards adopted under 37-22-201, MCA.

The definition of "social work" is:

(5) "Social work" means the professional practice directed toward helping people achieve more adequate, satisfying, and productive social adjustments. The practice of social work involves special knowledge of social resources, human capabilities, and the roles that individual motivation and social influences play in determining behavior and involves the application of social work techniques, including:

(a) counseling and using psychotherapy with individuals, families, or groups;

(b) providing information and referral services;

\(^{1}\)37-22-102(4), MCA: "Psychotherapy" means the use of psychosocial methods within a professional relationship to assist a person to achieve a better psychosocial adaptation and to modify internal and external conditions that affect individuals, groups, or families in respect to behavior, emotions, and thinking concerning their interpersonal processes.
(c) providing, arranging, or supervising the provision of social services;
(d) explaining and interpreting the psychosocial aspects in the situations
of individuals, families, or groups;
(e) helping communities to organize to provide or improve social and
health services; and
(f) research or teaching related to social work. (37-22-102, MCA)

The list of current exceptions to the limitation on practice in 37-22-305, MCA, include:

(1) other professions, such as physicians, psychologists, pastoral counselors, educators,
or the general public engaged in social work-like activities if they do not hold themselves out to
the public by a title of "licensed social worker" or "licensed clinical social worker." This is
considered title protection.

(2) activities, services, and use of an official title by a person in the employ of or under a
contract with a federal, state, county, or municipal agency, an educational, research, or charitable
institution, or a health care facility licensed under the provisions of Title 50, chapter 5, MCA,
that are a part of the duties of the office or position. It is this provision that allows the child
protective services workers at CFSD to practice without a license. It also applies to "social
workers" in nursing homes, hospitals, and many other health and human services-related
facilities that are licensed by the department.

(3) an employer performing services for employees; a student, intern, or resident
pursuing a course of study; and a person who has applied for licensure in this state and who has
been licensed in the state of former residence.

In the 2005 legislative session, Rep. Eve Franklin sponsored House Bill 682, proposed by the
National Association of Social Workers, Montana Chapter, to provide for multilevel licensure
for social workers. It would expand licensure to include the practice of associate, baccalaureate,
and master's social work in addition to clinical social work, and would require licensure of the
persons referenced above in paragraph (2) who work for governmental agencies or in licensed
facilities. It also proposed to amend the definition of "social work" (scope of practice) and to
expand the numbers of social workers on the board. The bill also attempted to define and clarify
independent practice outside of an organized setting and to allow baccalaureate level social
workers to have independent practice.

The bill was heard in the House Human Services Committee right before transmittal and did not
make it out of committee. The bill received support for supporting professionalism, providing consumer protection, consumer information, and a place to redress grievances. The bill offered a grandmother period of up to 5 years for those currently employed by a human services agency. The bill received opposition for removing the exemptions for other professions, for government agencies and licensed facilities, and for the general public. Organizations that may have been impacted include Child and Family Services Division, small rural hospitals, rescue missions, youth organizations, in-home services, the Child and Family Intervention Center, and nursing homes.

Nursing homes are licensed and regulated by the state and federal governments. The federal government requires nursing homes to provide "medically-related social services". A facility over 120 beds is required to have a "qualified social worker" who is defined as an individual with a bachelor's degree in social work or a bachelor's degree in a human services field including but not limited to sociology, special education, rehabilitation counseling, and psychology and 1 year of supervised experience.

Shirley Brown testified against the bill for the DPHHS. It was the department's position that the "broad definition would apply to most, if not all, individuals in the state who currently work in the human services field." The change would apply to at least 6 divisions in the department and to many private providers with whom the department contracts for services. The bill would apply to many positions who do not currently require any degree, much less a social work degree, such as case aides, social services technicians, case managers, and job-training coordinators. The department stated it would not oppose title protection in which only a person with a social work degree could use the title "social worker".

Other opponents stated the negative impact that this bill would have on rural hospitals and nursing homes, stating that most of their workers did not have these degrees and they would be unable to hire staff to fill these positions. Psychologists also objected to the phrase, "emotions, thoughts, and behaviors" being included in the term psychotherapy.

Many of the benefits of licensure may be able to be instituted by the department without licensure. In reviewing the training provisions of CFSD, NASW ethics and standards are presented in training. Consumer information is provided by the CFSD in many publications for the general public, professionals in the area, and for families involved in a report. For a place for
consumers to address grievances, information regarding the Division's complaint policy is included in "Accountability" below. It may be an area to pursue options.

OPTIONS

1. Request legislation for title protection for use of the term "social workers". This would require the CFSD and other divisions in DPHHS to refrain from using that term unless the person was licensed as a social worker. The DPHHS is on record saying that it would support title protection.

2. Require licensure for all social workers with the caveat that the committee must address issues such as independent practice, scope of practice, and exemptions for the public, nursing homes, and other licensed facilities, even if they want to include CFSD employees.

Standards

The GAO report on recruitment and retention contained selected Council on Accreditation (COA) for Children and Family Services Standards including staff qualifications in the child protective services, adoption services, and foster and kinship care service areas and family-centered casework: intensive family preservation. A quick review indicates that a Master's in Social Work or a comparable human services field and 2 years of direct practice experience or a Bachelor's in Social Work or comparable human service degree and 2 years of direct experience suffices for the child protective services service area. Adoption services requires previous experience, a Bachelor's in Social Work, or a bachelor's degree in another human services field. Foster and kinship care requires an advanced degree from an accredited social work program or a comparable human service field or a bachelor's degree supervised by a person with an advanced degree in social work or comparable degree and 2 years of experience. Supervisor qualifications generally require an advanced degree from an accredited social work program or comparable human services field and 2 years of direct experience.

The NASW is the professional association for social workers. The NASW Standards for Social Work Practice in Child Welfare have adopted a standard for qualifications: All social workers practicing in child welfare should hold a BSW or a MSW degree from an accredited school of social work. Standard 16 on Social Work Administrators in Child Welfare provides in its interpretations that an administrator is expected to have a graduate degree from an accredited
program and 5 years of postgraduate, direct child welfare experience, and to be licensed to practice as prescribed by law in the state.

OPTIONS
1. Require DPHHS to review its qualifications and compare to COA or NASW standards and to make recommendations.

Accountability

The CFSD has an internal complaint process in which there is an internal investigation and report for any complaint. The Division has thought of proposing a separate review board for each region and then a complainant could choose between a regional board review or a review by a division administrator. Personnel and disciplinary actions are confidential and are an issue that must be carefully provided for in any process.

In 2005, Senate Bill No. 385 was passed and approved by the Legislature but subsequently vetoed by the Governor. The bill sought to add duties relating to child abuse and neglect to the Mental Health Ombudsman. Because of issues related to the perceived expansion of the ombudsman duties, the confusion over the ombudsman's mental health duties and those duties of the Board of Visitors, and the potential dilution of the mental health responsibilities, the Governor objected to the bill. In the veto letter, the Governor did refer to the study resolution and stated, "I believe the interim study will identify whether the current system needs corrective action and, if so, to what extent and the method of correction."

Most ombudsman offices have been set up to protect the interests and legal rights of children in the child welfare and juvenile justice areas, especially state institutions, and to monitor programs, placements, and departments responsible for providing children's services. Ombudsmen receive, investigate, and respond to complaints and are not considered advocates.

A 2001 survey by the Rhode Island Office of the Child Advocate (considered the model by the American Bar Association) indicated that there were 25 states that had offices that could be considered as providing ombudsman services for children. There were many different varieties—some independent, some within the health department, some legislative, and some attached to a governor's office. Some offices were general in nature, applying to all of state government, and
some were specific to child welfare. Many were intended to perform investigations on complaints for children in state care or in facilities. Most did not specifically address parents' issues or complaints, except concerning the care of the children.

A related issue has been raised to staff's attention. In the panel discussion, one of the four forms of reports included "license reports." These are reports of abuse or neglect that are occurring in licensed facilities. Because licensure of facilities is administered through the Quality Assurance Division, these reports are referred to the other division as a license-related complaint, but the issue that was raised was whether that was an appropriate form of investigation in lieu of an investigation of the abuse complaint in itself. The abuse could be perceived as staff-on-resident or resident on resident and it was raised that perhaps they had not been trained specifically in understanding the power relationships between staff and residents and that abuse would not be properly revealed.

Interestingly enough, this relates to the Governor's veto message regarding the mental health ombudsman and the Board of Visitors. The Board of Visitors was traditionally the entity that was responsible to ensure that the treatment of all persons committed to a residential facility for mental illness or developmental disabilities is humane and decent. Because of the definition of residential facility, the Board of Visitors has expanded its duties over time and it has become confusing between the licensure processes and the complaint and site visitation responsibilities, in addition to private accreditation and standards of care.

OPTIONS

1. Require the department adopt ethical standards of practice that are specific to its mission. It could adopt by reference the NASW standards or other professional child welfare standards. It would then have to incorporate enforcement of the standards into their current personnel policies and take into consideration union contracts and other employee rights.

2. Recommend that the department develop an external complaint process or propose an alternative complaint process such as an ombudsman for child protective services. This would require additional research.
ADDITIONAL TOPICS

Other related issues include workload and caseload standards. Administrative burdens, paperwork, and the use of computer technology, which may either help or thwart the efficiency and effectiveness of child protective services workers, are areas that are related to recruitment and retention and may warrant a closer look. The CFSD is working on workload analysis, which will be provided to the Committee in the future. Additional information may also be gleaned from the federal review results to be reported later.

The committee was provided an abbreviated table of caseload standards from the NASW and the Child Welfare League of America (CWLA). Workload or caseload calculations can vary on whether you are measuring the time it takes to accomplish tasks and duties or if you are measuring the number of cases a worker can handle, and ideally both. Caseload standards are complicated and have many different variables to take into account, such as service and caseload type for each different type of worker.

A copy of the CWLA Standards requires purchase, however, the CFSD has a copy and would provide them to staff if further research is requested. Caseload standards developed by private, independent organizations would still need to be analyzed in terms of compliance with federal and state laws, and some may not have taken the latest federal changes into consideration in their development. Also, the specialization that is implied in the caseload standards may not be as directly applicable in a rural state where many workers perform the combined duties of positions that may be specialized in a larger city with a certain economy of scale.

ENDNOTES
2. E-mail correspondence with Ryan Tolleson Knee, Ph.D. 1/11/06.
5. Ibid. #2.


