Statement of Consideration (SOC)

Case Planning, Concurrent Planning and FTMs

The following comments were received when drafts relating to foster care and adoption were sent for field review. Thanks to those who reviewed and commented. Comments about typographical and grammatical errors have been excluded; these errors will be corrected as appropriate.

1. **Comment:** (Page 1, 1.6 Engaging the Family) Engagement occurs throughout the life of the case, not just at the case conference. There is great information here about the workers orientation, but it has been limited it to the realm of case conferences. This chapter is about engagement, per the title. Reorient and flesh out the content accordingly.

**Response:** No change was made as a result of this comment.
2. **Comment:** (Page 4, SOP 1.7 Family Team Meetings (FTM), #6A) Something should be added after the part discussing the child/youth action plan stating that this pertains to OOHC cases and not in home. Since this is a general area it needs to be clear for staff that are new and trying to figure this out.

**Response:** Adjustment made to include comment’s intent.
3. **Comment:** (Page 4, SOP 1.7 Family Team Meetings (FTM), #’s 1 and 2 under the SRA section) This section allows for an exception by the SRA or designee. What are the thoughts behind what would be an allowed exception?

**Response:** There may be occasions; i.e. in which a reunification is anticipated to occur during this period and it may be an appropriate exception.
4. **Comment:** (Pages 4-5, In home and OOHC FTM sections) I do not see the merit in having the 90 day FTMs. It is excessive and burdensome and these things should be occurring on a ongoing basis throughout the life of the case. You could meet the same goal by requiring the FSOS to consider an FTM if the need is identified during the regional 90 day consultation.

**Response:** These changes were based upon field input via conference call on 1/25/11 and 2/1/11 at which time a 90-day FTM was recommended. This time period was identified as a critical junction in the case and to align with concurrent planning expectations.
5. **Comment:** Are FTM’s mandatory for IN-HOME cases? Page 4 says to encourage them and document and get SRA/designee exception when they are not done, but page 9 says they are mandatory. This needs to be consistent.

**Response:** SOP was clarified to ensure consistency.
6. **Comment:** (Page 6, SOP 1.7 Family Team Meetings (FTM), numbers 3,4) These statements should be altered to say something about increasing visits. The way they are worded now, they fit better in the initial OOHC FTM.

**Response:** SOP was revised to incorporate comment.

1. **Comment:** (Page 6, SOP 1.7 Family Team Meetings (FTM), under the Family Reunification section) It seems as if the content in the reunification FTM should be placed somewhere else. I do not understand ASFA being discussed at the time of reunification as well as in the visitation section.

**Response:** This information has been deleted from 1.7, but is present in the Ongoing Case Planning section, which was originally numbered 4.35, but has been moved to 4.18.
2. **Comment:** (Page 7, SOP 1.7 Family Team Meetings (FTM), bulleted points 3-7) These do not seem to belong in this section. It seems as if they should be reorganized into ongoing casework during phase II of the SOP redesign.

**Response:** This language will remain in this section for this time period and will be considered for reorganization during phase II revisions.
3. **Comment:** (Page 7, SOP 3.2 Timeframes and Ongoing Service Requirements for All In Home Services Cases, SOP 4.24 SSW’s Ongoing Contact with the Birth Family and Child, Including the Medically Fragile Child, PPTL 08-05 and the Documenting Monthly Caseworker Visits with Children in OOHC Tip Sheet) These SOP sections and documents have conflicting statements regarding when face to face contacts must occur. The SOP sections (3.10 and 4.24) state that visits must occur “every 30 calendar days,” however, the PPTL and tip sheet state that visits must occur “each and every calendar month.” Please clarify which of these statements is correct.

**Response:** The tip sheet and both sections of SOP have been reworded to ensure that the words “every 30 calendar days” have been inserted as applicable.
4. **Comment:** (Page 9, SOP 3.2 Timeframes and Ongoing Service Requirements for All In Home Services Cases, #14B) Seems like the wording in this statement needs to be altered as a CQA is not required each time a significant change in a family occurs. The wording is confusing. Wasn’t this part of the workload reduction revision?

**Response:** This language does not represent new expectations and continues to be based upon best practice. No changes made to SOP draft.
5. **Comment:** (Page 13, SOP 3.4 Initial In Home Case Planning Conference, #14) We switched from talking case plans to prevention plan with no explanation as to how they are used in tandem, and how they are different.

**Response:** This content has been reorganized for clarification purposes.
6. **Comment:** (Page 16, SOP 3.5 Participants and Notification for All In Home Cases, bulleted points 2 and 3) These statements indicate that with in-home cases, fathers are required participants even if they are absent from the home. Does this include DV perpetrators as it does not mention any exceptions? Does it also include those fathers who are putative or do they have to have paternity established? If mom is absolutely against the father being involved, do we ignore her wishes and try to locate and involve him and his relatives anyway? (Needs some clarifying)

**Response:** If a father has been identified as a DV perpetrator, staff should determine (through discussion with the mother) the level of risk if the father is involved in the case planning process before including him.  In all other situations (including putative fathers and those where paternity has been legally established), staff should be searching for and including fathers and paternal relatives in case planning. This information has been inserted in the Practice Guidance section of this SOP.
7. **Comment:** (Page 19, SOP 4.15 Family Attachment and Involvement, #7) This section (4.15) needs to decide if it’s point is engagement over the life of the case or about locating and inviting case planning participants.

**Response:** This section is intended to provide guidance about case planning and family engagement. No changes made to content.
8. **Comment:** (Page 23, SOP 4.17 Preparation for and Five (5) Day Conference, under the Forms and Resources section) There are 2 tools that are called concurrent planning. Is that an oversight? Suggest renaming one.
Also the “Concurrent Planning Review Tool” is misnamed and confusing on the topic of aggravated circumstances—consider renaming or culling the aggravated circumstances material so that the concepts are distinct.

**Response:** These are two distinct tools that are utilized in different ways. Aggravated circumstances is included as it is an appropriate manner to screen concurrent planning. The Concurrent Planning Review tool was an existing too and was condensed from 2 pages to 1 page. The DPP-110 is utilized at the 90 day FTM.
9. **Comment:** (Page 24, SOP 4.17 Preparation for and the Five (5) Day Conference, last paragraph of the introduction) This paragraph is discontinuous with the topic—suggest that concurrent planning as subject matter is better in a larger discussion about goals selection. That material is currently on a tip sheet, but could be combined in the “negotiation of tasks and objectives” selection.

**Response:** Concurrent planning is not a permanency goal. Concurrent planning is best achieved talking early in the case in order that the most expedient plan may be considered for a child.
10. **Comment:** (Page 24, SOP 4.17 Preparation for and the Five (5) Day Conference, #3) Strike the words “investigative SSW.”

**Response:** No change to the language as the investigative SSW is the most logical point for this item.
11. **Comment:** (Page 25, SOP 4.17 Preparation for and the Five (5) Day Conference, #2 under the “During the 5 Day Conference” section) The “When your child is Removed“ handbook should be given at the time of the removal. Not sure if this form is discussed in other sections.

**Response:** This information was incorporated into the SOP.
12. **Comment:** (Page 25, SOP 4.17 Preparation for and the Five (5) Day Conference, #7E) Collapse this content into item F; also you’re using an active verb in what was written as a list of nouns.

**Response:** This comment has been completed.
13. **Comment:** (Page 26, SOP 4.17 Preparation for and the Five (5) Day Conference, #7H) This seems redundant to the steps above. Maybe suggest deleting or at least reword with deference to the stem.

**Response:** This comment has been completed.
14. **Comment:** (Page 26, SOP 4.17 Preparation for and the Five (5) Day Conference, #7I) This is not part of case planning, but is part of ongoing work. It should be moved, although discussion of the pattern of visits should be occurring at case planning conferences and could be rewritten that way.

**Response:** This is a reminder that occurs during the 5-day conference and is added for clarity.
15. **Comment:** (Page 27, SOP 4.17 Preparation for and the Five (5) Day Conference, #8) Should this be switched with procedure 9?

**Response:** SOP adjusted as a result of this comment to represent logical case flow.
16. **Comment:** (Page 27, SOP 4.17 Preparation for and the Five (5) Day Conference, #11) I am confused by the reference to the prevention plan.

**Response:** SOP will be revised to refer to Prevention Planning section which is in Chapter 1.
17. **Comment:** (Page 28, SOP 4.17 Preparation for and the Five (5) Day Conference, the content under the FSOS section) Seems like this would fit better if it came first in the procedural section or was moved to the introduction.

**Response:** This is a consistent format with the SOP redesign related to roles. No changes made as a result of this comment.
18. **Comment:** (Page 28, SOP 4.17 Five (5) Day Conference, 1st bulleted point under Practice Guidance) This is not part of case planning and should be moved to a more relevant location.

**Response:** This information was added to ensure that if the relative information had not yet been gathered or the family needed assistance, the 5- day conference for follow up with the family.
19. **Comment:** (Page 28, SOP 4.17 Preparation for and the Five (5) Day Conference, 2nd bulleted point under Practice Guidance) This should be in the R&C material, not part of case planning activity.

**Response:** Language was revised to include the role of the SSW to partner with either R&C staff or PCP staff for completion of this task and for clarity.
20. **Comment:** (Page 33, SOP 4.18 Ongoing Case Planning, #4B-C) You can actually have concurrent goals here, may want to reconsider these additions.

**Response:** There is nothing in Kentucky regulation language that directs concurrent planning for status cases or for PPLA, legal guardianship and emancipation cases, and although may be advisable in some situations, it is not a required practice.
21. **Comment:** (Page 41, SOP 11.30 Permanency Hearings, #s 7-9 under the SSW’s tasks) This should be done way prior to the permanency hearing, and seating this here could be very confusing. Suggest striking here and adding it to your 9month OOHC consult.

**Response:** This language is already placed in SOP 4.18 Ongoing Case Planning (this was formerly numbered 4.35) and it has been removed from this section.
22. **Comment:** (Regarding the deleted section for Negotiating Objectives and Tasks) I would suggest leaving this section alone. I would let it stand and include as preparatory section for both in-home and OOHC. You’ve made both those sections very long, by consolidating. I’d let this chapter stand and incorporate a discussion about goal section in an OOHC section on the same activity.

**Response:** Negotiating Objectives and Tasks has not been merged.
23. **Comment:** Seems like there is some back and forth between calendar days and working days. Is there any way to make this consistent?

**Response:** To the extent possible, each item will be considered to ensure that timeframes are consistent. However, there are sometimes legal or federal guidelines that prevent consistent frame of reference.
24. **Comment:** On the “Menu of Expectations for Batterers in CPS Cases” item number 3 discusses removing all weapons from the house of the perpetrator and giving/selling them to law enforcement for safe keeping. While I understand the need, this “need” needs to be court ordered and I am not sure that “we” can enforce this in some areas.

**Response:** This is correct. This document has been removed from the list of documents to be released until it can be reviewed.
25. **Comment:** On the Concurrent Planning Practice Guide, Factors Related to Abuse or Neglect, the second box just states “the child has experienced neglect”. This seems very broad, is this correct?

**Response:** This is existing language and was not revised. No changes will be made to this language at this time.
26. **Comment:** Will additional monies be placed in the Pro card budget due to the extra paper being needed to print out the various handbooks? ☺

**Response:** We will be asking for printing funds for these handbooks.