**Statement of Consideration (SOC)**

The following comments were received in response to SOP drafts sent for field review. Thanks to those who reviewed and commented. Comments about typographical and grammatical errors are excluded; these errors have been corrected as appropriate.

1. Comment: #4-Suggest changing the words “program improvement plan” to “plan of correction.”

Response: Language changed to “plan for corrective action” which aligns with 922 KAR 1:350.
2. Comment: #5 states “Completes the DPP-1289 Annual Strengths/Needs Assessment for Resource Families during the interview and enters it into the case record.” This could be clarified, as the way it reads it is not clear whether the entire 1289, should be put into reports and submitted for approval or if only a contact should be entered detailing the 1289 was completed and documentation of the interviews.

Response: Language for #5 has been changed to read “Completes the DPP-1289 Annual Strengths/Needs Assessment for Resource Home Families during the interview and enters it into TWIST.”

A bullet point has also been added to Practice Guidance indicating that a contact note also needs to be entered into TWIST.
3. Comment: #3 under the “Upon Completion of the Annual Re-Evaluation” section states that if the requirements have not been met, approval is denied–suggest that it states that the family is being placed on hold, because in essence, that is what is happening. It sounds like the home is being closed when we say we are denying their approval. Also, there is no place to check on the 1289 whether approval or closure was recommended. It seems like this should be consistent in SOP and in the actual annual.

Response: #3 will be revised to state “when the FSOS cannot verify that all annual re-evaluation requirements have been met, the FSOS approves the 1289.” An additional procedure has been added stating “The R&C worker submits the Resource Recommendation and chooses “closed to intake.”

If the annual requirements have not been met at the time of the interview, the R&C worker still checks the “Approval” box on the DPP-1289 form, but documents in comments that the home has been placed on hold and the reasoning for it. This information has also been added to Practice Guidance.
4. Comment: Under “Upon Completion of the Annual Re-Evaluation” section, #4 states that the FSOS prepares the on hold letter for SRA approval, but does not state who the letter is sent to.

Response: Content has been added stating that the on hold letter goes to the resource parent and a copy is kept in the hard file.
5. Comment: Under the “Upon completion of the annual re-evaluation” section, #4 states that the FSOS completes the annual on-hold letter. In our region the R&C worker does this and attaches it to the packet. I suggest changing this language back the way it used to be.

Response: The language has been changed to read that the FSOS or R&C worker completes the on hold letter.
6. Comment: Under Practice Guidance it states that when a resource home is under investigation, we must do background checks prior to the date of the anniversary of the original approval, but nothing is mentioned about the actual 1289. Does this mean that the AS/N assessment is not completed when an investigation is going on and that background checks are the only documentation that is completed during this time? If this is the case, when is the Resource Recommendation be completed?

Response: The 1289 is always completed by the original approval month regardless of whether there is a pending investigation. See #3 regarding completion of the assessment.

The Resource Recommendation should always be completed following the completion of the AS/N assessment and should have the same date of approval as the annual approval or on-hold letter mailed to the family. Therefore, the date line should be left blank on the annual letters so the SRA or designee may write the date in once the Resource Recommendation is approved.
7. Comment: Footnote #1 states that the billing specialist receives a copy of the AS/N packet. Why would the billing specialist need this information?

Response: The billing specialists do not need a copy of the AS/N assessment. This has been removed.
8. Comment: On the Annual Re-Evaluation Coversheet, it states that the DPP-170 Financial Statement-Resource Parent Applicant and DPP-108 Health Information Required for Resource Home Applicants Regarding Dependent Children must be completed each year. I thought the DPP-170 only had to be completed if there was an issue with the home’s finances. I also thought that the children’s physicals (DPP-108) were not mandatory to have completed every year.

Response: According to 922 KAR 1:350, physicals are required for both children and adults annually and the DPP-107 and DPP-108 should be used as documentation for these requirements.

In regard to the financial statement itself, the 170 is not required as there is a place on the 1289 to document financial changes. It will be left up to the regions to determine the way they wish to acquire that information. See the statement from the regulation below:

A resource home applicant shall have a source of income:

      (a) Sufficient to meet the applicant's household expenses; and

      (b) Separate from:

      1. Foster care reimbursement; or

      2. Adoption assistance.

1. Comment: Should the following forms be added to the Forms and Resources section of this SOP: DPP-107-Health Information Required for Resource Home Applicants or Adult Household Members, DPP-108 Health Information Required for Resource Home Applicants Regarding Dependent Children and DPP-170 Financial Statement-Resource Parent Applicant?

Response: The DPP-107 and DPP-108 have been added to this section, but the DPP-170 has not. See the answer to #8 for more information.
2. Comment: #1D, suggest changing the language to something like, “R&C worker reviews and obtains the completed DPP-170 Financial Statement-Resource Parent Applicant, DPP-107 Health Information Required for Resource Home applicants or Adult Household Members, and DPP-108 Health Information Required for Resource Home Applicants Regarding Dependent Children.” I think this would make it clearer in regard to what forms the worker needs to have the family complete/update for the annual re-evaluation.

Response: Language has been added under 1D vii stating that the R&C worker reviews documentation “regarding the information contained on the Annual Re-Evaluation Coversheet.
3. Comment: I think the resource home county’s SSW and FSOS need to be aware of any changes in the foster home, know about any questions or concerns and be given notification of approval of the annual review.  I also think that it would be beneficial, if there are current foster children placed in the home, for the ongoing worker to be involved in the annual re-evaluation and to discuss any issues, questions or concerns with the R&C worker and FSOS.

Response: Language added to Practice Guidance stating that it is best practice for the R&C worker to contact the SSW for the children in the home in some fashion to discuss any issues, questions or concerns regarding the family.
4. Comment: Additional documents to include on the Annual Re-Evaluation Coversheet:
* Privacy and Security of Protected Health Information, Confidential and Other Sensitive Information;
* DCBS-1 Informed Consent and Release of Information and Records and DCBS-1A Informed Consent and Release of Information and Records Supplement;
* DPP-1291 Resource Home Discipline Policy;
* Driver’s license;
* DSS-885A (children’s statements);
* FAP TRIS update form;
* Narrative about the family over the last twelve months;
* Proof of insurance;
* Pet vaccinations;
* Resource recommendation;
* Safety checklist;
* Sex offender check (this will be added after the regulation is revised);
* Training record;

Response: The following documents have been added to the coversheet:

* + Privacy and Security of Protected Health Information, Confidential and Other Sensitive Information;
	+ Driver’s license;
	+ Proof of insurance; and
	+ Training record.

The following documents have not been added to the coversheet for the reasons described below:

* Privacy and Security of Protected Health Information, Confidential and Other Sensitive Information-This form is not mandatory to be completed on a yearly basis as it is completed during the approval process and confidentiality is part of the contract that resource parents sign every two years;
* The DCBS1 and DCBS-1A are release of information documents. It is not permissible to maintain a blanket release on a family at all times. If there is a need to obtain confidential information, the worker should obtain a new release of information each time this becomes necessary;
* The DPP-1291 Resource Home Discipline Policy-discipline is addressed in the family’s contract and on the AS/N assessment, so unless there is an issue regarding discipline that prompts action, it is not necessary to complete this form each year;
* DSS-885-This is an old form that is no longer utilized by the agency;
* FAP TRIS Update form-this form is completed after the re-approval and would not be available to send with the packet;
* Narrative about the family over the last twelve months-this is included on the AS/N assessment and is not required on an additional document;
* Pet vaccinations-this information is requested on the AS/N assessment so workers should be prompted to collect them when going over the 1289 with the family during the interview;
* Resource recommendation-this step is completed after the packet has been turned into the FSOS so it would not be something that needs to be on the coversheet;
* Safety checklist-there is a section on the AS/N that addresses safety. This is sufficient and an additional safety checklist is not required;
* Sex offender check-this will be added after the regulation is revised, but is not yet effective.