Statement of Consideration (SOC)

SOP 12.6 Foster and Adoptive Home Parents Approved by Other States or Licensed Child Placing Agencies, SOP 12.7 Approval and Denial, and SOP 12.16 Annual Re-Evaluation

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

1. Comment: It’s not necessary for an SRA to approve each and every foster home. That just creates a bottleneck for foster home approvals that isn’t necessary. The FSOS should have a sufficient level of expertise to approve foster homes, and the SRAA may or may not have any R&C experience upon which to base a substantive review of the home. Thus the SRA approval not only creates a bottleneck, it is one that exists for appearances only- and becomes a rubber stamp. An unnecessary, meaningless layer of review is really just a delay and an administrative burden for everyone.

Answer: A portion of the regions are already doing this, changes will be made to provide consistency.

1. Comment: During prior audits, when you add the SRA layer of review into the SOP- you are for the feds view, making that the official approval- so nothing moves forward in terms of placement or IV-E reimbursability without it. It also means that the annual review keys form the date of the SRA signature on the letter, and not the date approved in TWIST. Thus all management reports that aren’t tracking the SRA letter approval dates are invalidated, and annual reviews that don’t key form the date of the letter are mistimed, and this mismatch has previously resulted in federal financial penalties.

Answer: A portion of the regions are already doing this, changes will be made to provide consistency.

1. Comment: This policy seems to contradict SOP 12.7. This SOP states the R&C worker meets with the family at approval but in SOP 12.6 it clearly states SRA or Designee.

Answer: Changes will be made to SOP 12.7 to include language stating that R&C worker schedules a time to meet with the family to notify them of their approval as a foster and adoptive parent.

1. Comment: So, which is it? What is the intent of the SOP? It is not clear and the SOP needs clarity but it does seem unnecessary for the SRA or designee (which will be SRAAs); to actually read each home study AND meet with each new family. Both SOP 6 and 7 has the SRAA reading each home study. Again, I don’t feel this is needed. We should allow our FSOSs to make those decisions and ask for assistance from SRAA as needed.

Answer: SOP 12.6 requires the R&C worker to meet with the family, not the SRA designee. SOP 12.6 and SOP 12.7 are each referencing approval. SOP 12.6 is referencing foster/adoptive parents transferring to DCBS. For consistency sake, both are updated.

1. Comment: SRCA does not have time to read all home studies. This SRCA only reads ones where the FSOS has asked an opinion or has been required due to sensitive issues of the family. This region approved over 70 families last year. If SRCA had to read all of them, it would only add time to the approval process. Part of the SOP also states upon approval of the home study by the SRA or designee, schedules a time to meet with the family to notify them of their approval. There is no way the SRCA can do that. It isn’t necessary IF the goal is to get the SRCA to know our families better, there are other ways to do that. Like attending any and all appreciation events, talking to families, presenting at trainings and so on. This SOP is unrealistic and is unnecessary. Perhaps a letter of welcome from the SRAA is sufficient.

Answer: An associate is already approving the annual re-evaluations for all approved foster homes. This SOP removes that requirement, thus reducing workload. By approving home studies on the front end, applicants with high-risk behaviors or issues can be caught earlier. SOP 12.7 states that upon home study approval that the R&C worker will schedule a time to meet with the family to notify them of their approval.

1. Comment: Under section labeled: Forms, shouldn’t it list DPP-1407, DPP108 and/or DPP 107 & DPP 108 Spanish be labeled if applicable for the Spanish version? For the DPP 111 or DPP 111 Spanish also be labeled if applicable for the Spanish version? For the DPP 117 Verification or certified copy of marriage certificate/death certificates? DPP 1291 this version of the checklist has things that I’m not sue how workers would know for sure such as; comply with State and Local Water requirements, comply with state and local sanitation requirements.

Answer: This issue will be tabled for another discussion. Not relevant to the proposed changes at this time.

1. Comment: In SOP 12.7 under 2, why are there minimum of 4 interviews when we took the SAFE training I thought it was 3 interviews. On interview 2 and 3 what is the difference in those meetings, when you interview each applicant separately and privately you get the one on one history interview. What staff do is interview them separately then bring them back together to go over stuff too. Why would you need two different interviews? Having 4 interviews as requirement for all home studies is not appropriate. 3 interviews give the worker and family sufficient time to get the information they need. If there are issues or concerns then I could see why workers would need 4 interviews or more.

Answer: In a single parent household, 3 interviews would be sufficient. In a 2-parent household, 4 interviews are required: 1. Introduction, 2. Administer the QII, 3. Interview one parent, 4. Interview other parent. Spouses are to be interviewed separately. SAFE training mandates 3 home visits.

1. Comment: This regions current process for having the perspective foster parents read their study is, once the worker types up the study the FSOS reads it then if any questions changes it. Then the worker has the prospective foster parent to come into the office to read it, corrects it while the parents are in the office the prints it and has the parents sign it. Once they sign it, then the FSOS signs it, then it is sent to the SRA/designee to read and sign.

The way policy will be written will require a lot more steps for the parents and workers and could cause a delay in getting the study done timely. I don’t see why we would have them read the draft, then have them read the final. If the SRA designee has any concerns with the study we would type an addendum to it and have the parents read that and sign it. If there are issues/concerns with the perspective foster parents we would meet with SRA designee prior to the worker completing the study to make sure all of the concerns were answered. I just feel that there are a lot of unnecessary steps in the the way it is written. It is hard sometimes to get a time for the parents to come in and read it one time, let alone twice.

Answer: The parents review the draft and final to maintain transparency and to catch minor changes.

1. Comment: The request for an extension, could you add the timeframe the worker would have to do that request, like is in one week before the study is due or two weeks?

Answer: The time frame is at the discretion of the FSOS.

1. Comment: SOP 12.16 The FSOSs are quite competent in review of the annual assessments. At present this regions the SRCA reviews all but can (and will) review on any with concerns or a corrective action plan. The DPP 108s and immunization forms are something we have asked our families to do (for the most part), so we are a bit ahead of the game on this one. The fact that a family should not take placements while on hold, makes sense. We will just have to monitor that closer.

Answer: Statements only, no answer required.

1. Comment: Under the section that starts “in addition to completing the annual re-evaluation report, the R&CD worker:

Will the anniversary date still be based on the family’s approval date or will it be altered to match the dates being used for the M-049 report? In TWIST training for R&C the concern noted was that the date being used is the date that the last recommendation was approved at the SRA or designee level that does not match the family’s original approval date. In addition, for some families the original res. rec. entered date does not match the family’s approval date.

Answer: The anniversary date will remain 12 months from the family’s approval date. No change will be made.

1. Comment: Provide the information to records management using the signed DPP-157?  Is there a timeframe records management has in completing the background checks for annuals? The DPP-157 signature now is only good for only 30 days.  The processing times for these have varied tremendously over the last few years so there is no good way for staff to know what they could/should to be timely in getting results prior to annual re-evaluation being considered past due. Also currently how it is set up in ITWIST if the task for background checks has expired it won’t allow staff to complete the annual recommendation.  The regulations says the following: **922 KAR 1:490. Background checks for foster and adoptive parents, caretaker relatives, kinship caregivers, fictive kin, and reporting requirements.**

Section 7. Reevaluation. (1) An approved foster or adoptive parent and each adult member of the household shall submit annually, prior to or during the anniversary month of initial approval, to:

   (a) A criminal records check as described in Section 2(1)(a) of this administrative regulation;

    (b) A child abuse or neglect check conducted by the cabinet; and

    (c) An address check of the Sex Offender Registry.

Answer: There are ongoing discussions regarding this and improvements may be made in the future.

1. Comment: If the family has signed and returned the DPP-157 and the worker sends it off prior to or during the anniversary month haven’t we met our burden according to the regulations? Couldn’t terminology being used in this point be worded stronger to clarify that a discussion/assessment be completed upon receipt of results from records management since that piece seems to be out of our control and sporadic? Maybe a way to specially label that contact so it could be sorted for and searched for to assess compliance/follow through?

Answer: TWIST already has the ability to capture this information in the annual assessment.

1. Comment: Under the section labeled: “Upon completion of the annual re-evaluation report:

Attach Annual re-evaluation coversheet – shouldn’t coversheet be updated to reflect that TRIS record (since this can be pulled from TWIST case shouldn’t it be part of the written report?

Shouldn’t the DPP-108 be removed or just noted as needed if new children have been added to the family since Central office clarified only immunization record is needed for children after initial approval? Should there be suggestions as to what those other attachments should be? Like copy of proof of pet rabies vaccinations, receipt of DPP-154, DPP-1291 discipline policy, EPID 230, ED 230A, etc.

Answer: Cover sheet will be revised.

1. Comment: Should the sample letter for on-hold be more specific to the way the SAFE update is worded and to what paperwork a family is required to turn in at annual reevaluation?

Answer: There are ongoing discussions related to the type of home study model that Ky uses. This may be considered in the future and the sample can be edited to fit the need of the worker, family, region, etc.

1. Comment: Under the section labeled: “Practice Guidance: Under 2nd bullet shouldn’t staff be directed to request a new check when notified of the completion of the investigation? The one received from records management will note – A matter subject to administrative review  found in accordance with 922 KAR 1:470 I believe so we don’t have a clear indication that there is not a substantiated finding against the family members or that there is not a substantiated finding on the family members.

Answer: Checks are only mandated at recertification and at the discretion of the FSOS.

1. Comment: For the last bullet, can’t an e-mail suffice if staff are directed in the practice to upload a copy of the entire annual reevaluation packet labeled to include the annual re-approval year into ITWIST?

Answer: Changes will be made to this item.

1. Comment: Under section labeled: “Footnotes:

5. What is being referred to in this item? Also can an e-mail not suffice if the entire annual re-evaluation is uploaded into the case and/or a copy of the off hold verifications uploaded labeled using the annual year? For example family placed on hold in 2017 annual re-evaluation completes requirements January 2018. The Off Hold letter would be labeled Off- Hold Smith family 2017 Annual.

Answer: Footnote 5 will be removed.

1. Comment: If suggestions made for background checks above are accepted then this would need to change to match wording used to reflect that change.

Answer: No change will be made.

1. Comment:  12.16 3 B transfers the desk guide ratings of 1,3, 4 or 5 (not 2s) and the mitigation ratings from the original SAFE home study to the annual re-evaluation Psychological inventory in the column indicated on the inventory. Does that mean do this each annual year after year-put the mitigation ratings from the original home study? Or does it mean it do it the first time but on the second annual you would take the ratings from the last annual? I was confused and some of my staff thought it meant you would keep the original ratings from the study on each annual?

Answer: Yes, SOP advises staff to carry over the prior rating and then mitigate the rating on the updated forms. Central office staff will attempt to clarify this process in future policy updates.