Statement of Consideration (SOC)

PPTL 20-08 SOP 4.10.4 Child Specific Foster Home, SOP 4.5.5 Relative and Fictive Kin Placement Foster Care Payments, SOP 5.1 Relative and Fictive Kin Placement Consideration, SOP 5.2 and DPP-179 Relative/Fictive Kin Caregiver Agreement Statement of Rights and Responsibilities Prior to Foster Parent Approval

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.

**SOP 4.5.5 Relative and Fictive Kin Placement Foster Care Payments**

1. **COMMENT:** No comments.

**SOP 4.10.4 Child Specific Foster Home**

1. **Comment:** Under procedure it doesn’t state who will be doing this (The SSW?)

**Response:** Each number under Procedure is assigned to a noted person.

1. **Comment:** There’s no mention of the DPP 178 which has to be signed stating they either want direct custody or they want to be a DCBS Foster Parent. This should be included in this section as it has to be signed if they are wanting to be a Child Specific Foster Parent.

**Response:** Change has been made and language regarding DPP 178 has been added**.**

1. **Comment:** The way it is written it minimizes that this should be done prior to Temporary Custody Hearing.  It states if they have Temporary Custody then they can’t be child specific.  There should be more information regarding ensuring that the DPP 178 & DPP 179 are completed (signed & uploaded) before the Temporary Custody Hearing.

**Response:** More specific information regarding this protocol is found in SOP 5.1 Relative and Fictive Kin Placement Consideration.

1. **Comment**: Edits haven’t been carried into Chapter 12 (ICPC) which still uses all the same words, i.e. “home studies” and refers to the now non-existent 1279.  These are parallel processes, and the changes need to be carried into Chapter 12 as well to avoid conflicts.  ICPC “home studies” are now being done on the 1277—because there is no 1279, but the words on that form are “safety check,” and are in conflict with the SOP requirement in that section requiring that we produce an actual home study for these homes.

**Response:** Changes are forth coming for SOP 12 Foster and Adoptive Family Recruitment, Certification and Reimbursement.

1. **Comment**: In XXXX County (and probably others), the DPP 1277 gets sent to me not an R&C supervisor. Also I suggest that the entire DPP 1277 gets sent after 3 days, not just section 1. Section 1 doesn’t address their CPS and criminal record and does not have anywhere for SSW or FSOS to sign. In my opinion, R&C needs to know more than just section 1 before starting the home evaluation process. And in practice, section 1 of the DPP 1277 doesn’t come to me within 3 days already and is taking much longer than 30 to get the rest. For me it is important to have the supervisors signature before it goes to R&C to start the home evaluation process so I know they are aware of any issues with the caregivers and in agreement with placement before R&C starts the home eval. Proposed corrections in blue:
2. The SSW or FSOS will submit a copy of the completed ~~section 1 of the~~ DPP 1277 **Safety Check and Review** ~~Home Evaluation~~ to the ~~R&C supervisor~~ Regional Point Person within three (3) business days of ~~the caregiver’s decision to purse approval as a foster parent~~ placement with that caregiver or the initial court date placing that child in OOHC. (if the relative decides a month before the TRH that they want to do Child Specific, that would be too early to start home eval process because child not even in CHFS custody yet)
3. **A relative or fictive kin pursuing foster parent approval is eligible to receive a reduced per diem until the foster home approval is effective.  In order to be eligible for this payment all of the following must be present:**
   1. **The child must be in the custody of DCBS;**
   2. **The family must be actively pursuing approval as a DCBS foster home;**
   3. **The family must sign the DPP-179 Relative and Fictive Kin Caregiver Agreement; and**
   4. **The child’s biological parent cannot reside in the home.**
4. ~~The SSW or FSOS will submit a completed and signed copy of the DPP 1277~~ **~~Safety Check and Review~~** ~~Home Evaluation to the R&C supervisor upon completion.~~ (if you leave this in here and don’t decide to have it completed all within the first 3 days, then definitely have a due date of completion on this line- ex. 30 days.)

**Response:** The DPP 1277 should only be sent to R&C if the family has indicated they are going to pursue foster care approval. SOP 5.1 is more specifically geared to provide guidance for relative and fictive kin placement. Section I of the Safety Check and Review requires a check of initial history and background check prior to placement. If the SSW is aware of concerns they should be documented in section I as well as any long and short term implications of the concerns.

1. **COMMENT:** The SSW or FSOS should be submitting more than just the DPP 1277 within the first 3 business days- 178, 179, 1278, 159, twist, criminal history also very important.

**Response:** Change was made to include DPP-178 and DPP-179.

1. **Comment:** Attached is a flow chart and checklist that I created with all the forms we require that might be helpful.



**Response:** The service array specialist is discussing and sharing these documents in regional trainings. The documents will be added to the SOP manual under Related Resources.

**SOP 5.1 Relative and Fictive Kin Placement Consideration**

1. **COMMENT:** R&C workers completing the DCC-85 when families are interested in being foster parents. They complete the daycare memo to pay for child care from the time the child enters care. Why would they be completing the DCC-85?

**RESPONSE:** Change is made to reflect that R&C worker completes the child care memo**.**

1. **COMMENT:** Staff feel that the below sections are confusing as it states that they must sign the DPP 178 prior to the first court date, then states that if the child is placed with the Cabinet they have 10 days to sign the DPP-178 prior to the first court date.  Staff feel that it needs to be clarified which court date you are referring to that the DPP-178 needs to be signed before.  The Temporary Removal Hearing or the Adjudication.  In some courts if you only file a petition, they do not have a Temporary Hearing, they only have Adjudication.

SOP 5.1

1. Advises that the caregiver must make their decision of which permanency option best suits their family's needs by the initial court date.  **If the child is placed via prevention plan or in the custody of the Cabinet, the caregiver may have ten (10) working days to complete the DPP 178 indicating their choice**;**3**
2. Ensures that the relative or fictive kin signs the Acknowledgment form prior to the first court date;

**Response:** If the caregiver has indicated intent to seek foster parent approval, DCBS should file an ECO or place the child on a prevention plan and request that the child be placed in the custody of the Cabinet at the first court date, depending on the preference of the court jurisdiction. If caregiver has not indicated intent to request foster parent approval, the practice remains the same as current practice of placing with a relative.

Additional clarification is added regarding when the DPP-178 should be completed.

**SOP 5.2 Ongoing Services and Permanency for the Child Placed through Relative or Fictive Kin Placement**

1. **Comment:** How does this affect children placed out of state?  Per ICPC KY is to maintain custody of the child/ren.

**Response:** This does not change anything**.**

1. **Comment**: I didn’t see the procedure for Caregiver/Relative/Fictive-Kin choosing option 2.

**Response:** Updates to SOP 5.1 Relative and Fictive Kin Evaluation and Placement Consideration and SOP 4.10.4 Child Specific Foster Home address this issue.

1. **Comment:** We may want to include the required paperwork to submit to the appropriate point person(s), or team. Ex: Section 1 of 1277 should be submitted to R&C Supervisor within 3 business days.

**Response:** Updates to SOP 5.1 Relative and Fictive Kin Evaluation and Placement Consideration and SOP 4.10.4 Child Specific Foster Home address this issue.

1. **Comment:** We may want to confirm Fictive-Kin Caregivers are eligible for the $6.00 per day, as well as blood relative caregivers.

**Response:** Updates to SOP 5.1 Relative and Fictive Kin Evaluation and Placement Consideration and SOP 4.10.4 Child Specific Foster Home address this issue.

1. **Comment:** We may want to confirm that Caregivers (Fictive-Kin and Blood Relatives) are eligible to receive services (K-Tap, Medical Card, Child Care, etc.) for the child, despite the Caregivers income, and the length of time (Full Disclosure).   This is important as it appears most of the Caregivers (Fictive-Kin and Blood Relatives) may require Financial Waivers indicating some financial limitations, which may result in placement disruption if appropriate services are not available.

**Response:** Waivers are only considered for relative fictive kin approval for child specific foster homes.

1. **Comment**: Acknowledgment Form add “DPP-178” beside the name, as that is the actual form #

**Response:** All forms and resource links have been updated**.**

1. **Comment: + “DPP-179, Relative/Fictive Kin Caregiver Agreement-** Statement of Rights and Responsibilities Prior to Foster Parent Approval”

**Response:** All forms and resource links have been updated

1. **Comment**: + Relative and Fictive Kin Caregiver Discipline Policy (agreement)- to be completed at the time of placement.

**Response:** All forms and resource links have been updated

1. **Comment:** Service Array Worksheet

**Response:** All forms and resource links have been updated

1. **Comment:** Under Procedure For relatives or fictive kin caregivers choosing option I. (relative or fictive kin is granted custody, guardianship, or power of attorney (POA));

*Should information be added that provides SW with instructions on what to do for the above choice number 2 (or if provided in another section, could that be referenced under the option 2 (shown above) so that SWs and FSOSs know where the information for that process is located):---*

For relatives or fictive kin caregivers choosing option II. (DCBS obtains custody while the Relative or fictive kin placement pursues approval as a child specific foster home per SOP Chapter 12); SW completes the DPP-178, DPP-179, and Relative and Fictive Kin Caregiver Discipline Policy (agreement). SW completes Section I of the DPP-1277 Safety Check and Review and provides it (along with the above listed forms) to their region’s R&C team. SW provides the relative with the contact number for their regions R&C child-specific/foster parent contact person so that the relative can seek information about attending their informational meeting and required pre-service trainings. Etc.

**Response:** Updates to SOP 5.1 Relative and Fictive Kin Evaluation and Placement Consideration and SOP 4.10.4 Child Specific Foster Home address this issue.

1. **Comment:** We do have concerns re: the use of a POA which was already in SOP.  POA is revocable at any time by the parent.  It’s hard to see how this would be ensuring safety of the child.  As soon as we close the case, they can just rip up the POA and come back and take the child and the relative has no choice but to give the child to them.  Also, POA only allows them to make educational and medical decisions, if the hospital/doctor or school will accept it and we have several that will not accept a POA.

**Response:** This is legal option and not mandated by policy.

**DPP-179 Relative/Fictive Kin Caregiver Agreement Statement of Rights and Responsibilities Prior to Foster Parent Approval**

1. **Comment:** No comments.