Statement of Consideration (SOC)

PPTL 20-19 SOP 30.5 Citizen Foster Care Review Board and Interested Party Review. 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 30.5**

1. **Comment:** The TWIST system is designed to capture DCBS work; it is NOT a notification system for AOC.

DCBS personnel are already responsible for entering required information for NCANDS, AFCARS, risk assessment, ongoing assessment, case plans, and contacts.

DCBS personnel should not have to do any additional data entry to satisfy the IPR process.

Instead, I’d propose a statutory change that eliminates IPRs altogether (they are not federally required, they do not impact outcomes, and they are extremely burdensome),

**Response:** This interface between TWIST and AOC was developed to better streamline the request for information (RFI) process that already occurs for IPRs. Instead of staff completing a word document and emailing to AOC with the contact information for the interested parties, this will occur in TWIST with auto-population of data, when possible. Then, the RFI will be sent through TWIST to AOC. This interface is the first phase of a multi-phase data sharing project between TWIST and AOC to streamline data collection for both DCBS and AOC, as well as meet federal requirements for mandatory data exchanges for courts under the Comprehensive Child Welfare Information System (CCWIS) Final Rule Data Exchange Requirements, specifically related to mandatory data exchanges with courts (45 CFR 1355.55(e)(2)).

1. **Comment:** I actually just had a foster parent request this paperwork that is filled out by the FCRB today.  She stated that “Per the Foster children's Bill of Rights, C…… should have anything relating to his court case”.  there is no indication in sop that the cabinet provide her with these copies.  (or the child because she said the child wants them).

so maybe clarifying that responsibility  (and do you know if we give it or not?  I told her no that she could contact the GAL for this information )

**Response:** KRS 620.363 (10) also known as the Foster Child Bill of Rights, states that foster children “Receive notice of and participate in court hearings.” KRS 620.270 (4), relating to the scope of the CFCRB review states that notice of the interested party review and the right to attend and participate in that review shall be provided to the child who is the party to the case. This same statute requires that the Cabinet shall provide the Administrative Office of the Courts (AOC) Citizen Foster Care Review Board with the names, addresses, and any other needed contact information in order to provide adequate, timely notice of the review to the parties required to be invited to the interested party reviews. This contact information is provided only to AOC staff who process the interested party reviews. With the new interface between TWIST and AOC, this information will no longer be housed in the AOC CFCRB computer program known as CATS (Children’s Automated Tracking System). Per statute, that information is provided to AOC CFCRB staff to provide notice of the reviews and nothing more. In addition, the IPRs are not court proceedings. The new interface to share contact information is not part of a court hearing, it is solely to provide notice per statute of the IPRs.

1. **Comment:** Staff are concerned that this change allows the parents to obtain copies.  This is concerning because of some of the information on these forms, etc…  include foster parent information, addresses, etc.

**Response**: Clarification has been added to SOP. The information from the RFI forms, as well as the interface for the new data transfer, is solely for notification purposes; that information does not appear on the findings and recommendations form that is submitted to the court or DCBS. Contact information is not shared with anyone other than AOC/CFCRB staff.

1. **Comment**: Also it indicates the parents will be sent this information - this would require correct addresses in TWIST- which never seems accurate and most likely things will be sent to wrong the wrong address/people.  There will also be a cost associated with this, will these be sent at the expense of DCBS?  It does not say they will be sent via certified mail, but would it not have to be due to confidentiality?

**Response:** Staff should update all contact information (addresses, phone numbers, etc.) in TWIST anytime a change occurs. Only parents who attend IPRs are sent a copy of the IPR findings. AOC incurs the costs associated with mailing the IPRs to the parents who attend the IPR. The completed IPR form that is sent to the parents does not contain the addresses from the interface/data transfer. A clarification has been made to the SOP.