Statement of Consideration (SOC)

PPTL 21-20 SOP 5.1 Relative and Fictive Kin Placement Consideration. 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 5.1**

1. **Comment:**

**Practice Guidance**

**A DPP-1277 Safety Check and Review is needed anytime a child is removed from their home of origin, a relative or fictive kin requests for their home to be evaluated for placement, and any placement move that occurs during an investigation or ongoing case.**

Staff feel that it should note ie: via Safety Plan, Prevention Plan, Power of Attorney, etc.. in the area above.

**Response:**

The safety plan occurs during the investigation or ongoing case which is covered in the SOP. A child should not be placed outside the home on a prevention plan. The question containing POA is unclear, however, a child should only be placed outside of their home through a court order or via a safety plan. Both the court order and safety plan occur during an investigation or ongoing phase of a case, therefore, no changes will be made.

1. **Comment: The assessment of the relative or fictive kin caregiver’s home should contain adequate details to accurately depict the home environment, while completely capturing the caregiver’s ability to meet the basic needs of the child. ​**

* Criteria for the SSWs assessment of whether it is appropriate to place a child with a relative or fictive kin caregiver may include, but is not limited to the:
  + Child's relationship with the relative or fictive kin;
  + Relative or fictive kin's ability to meet the child's basic needs;
  + **Relative or fictive kin’s ability to meet the financial needs of the child;​**
  + Relative or fictive kin's ability to meet the child's medical, emotional, educational, or treatment needs;
  + Possibility of placing siblings together; and

Staff feel that it should state assessment is needed on all household members, including those that spend significant about of time like paramours, need to be assessed in the safety check and review.

**Response:** Language added to include: **The assessment of the relative or fictive kin household should include an assessment of all individuals who stay in the home overnight more than one (1) night per week.**

1. **Comment:** When a child is placed with a relative or fictive kin caregiver, the SSW will complete the caregiver placement screen **in their active case in** TWIST.  This will initiate an intake with central intake and will generate the DPP-1277 Safety Check and Review

Staff feel that a timeframe should be added to highlighted section above.

**Response:** Time frames for the DPP-1277 are established in SOP. The TWIST screens were established to move the DPP-1277 online to increase efficiency and reduce work load. To be a reduction in work, the screens should be completed at the time of placement when staff has access to complete the DPP -1277 online. This will reduce the chance of error due to information being entered multiple times.

**SOP 5.1**

**Procedure:**

The SSW:

4. B. DCBS obtains custody- relative or fictive kin pursues approval as a child specific foster home per SOP chapter 12:

* + 1. Child enters and/or remains in the Cabinet's custody;
    2. The SSW or FSOS submits a copy of the completed section I of the DPP-1277 to the local R&C supervisor within three (3) working days of the caregiver's decision;

17. Completes section II of the DPP-1277 within thirty (30) working days, documenting the following factors:

1. **Comment:** When a child is placed with a relative or fictive kin caregiver, the SSW will complete the caregiver placement screen **in their active case in** TWIST.  This will initiate an intake with central intake and will generate the DPP-1277 Safety Check and Review

Staff feel that completion 159’s should also be added here.

**Response:** This is noted on the DPP-1277 and on the TWIST screen.

1. **Comment:** Previously the RPSB was specifically for relatives when the findings were substantiated against a parent or death of both parents but that terminology has changed to naming a parent of neglect or abuse or death of both parents. Just wanting to clarify if it was a mistake or if it is changing?

**Response:** A check of historical versions of the SOP do not indicate that there has been any change in the language. Substantiation was never mentioned as criteria for eligibility.

* The relative placement support benefit (RPSB) is provided one (1) time to facilitate the placement of a child with a non-parental relative, if it is determined that a child is at risk of being placed in foster care, or is in the custody of the Cabinet and residing in foster care due to abuse or neglect naming the child's biological or adoptive parent as the perpetrator, or the death of both parents.

1. **Comment:** This SOP doesn’t specify (and we’ve been hit with it since COVID), some states

will NOT accept a virtual walkthrough, and staff need to know that on the front end by asking the ICPC administrator.

**Response:** The [PPIM 20-16 Updated Face-to-Face information](https://manuals.sp.chfs.ky.gov/Resources/PPIM%20Library/PPIM%2020-16%20Updated%20Face-to-Face%20information.doc) which was released November 20, 2020 provided guidance on in person walk through. As in person communication continues to expand, further guidance will be forthcoming.

1. **Comment:** It would be helpful if the following values were triggered by Lisa Shaeffer and incorporated into the assignment that comes from CI.

* Is this a request for a safety check or a request for placement supervision (right now they are unclear),
* Does the sending state have a requirement around face to face versus virtual contact, and
* Does the sending state require a placement to be a certified foster home in the receiving state?

**Response:**

* The request for a safety check or a request for placement supervision is currently differentiated on the intake summary.
* As across the world, we are all slowly reopening; soon all visits will be back in person, and there will be no need to discuss or know up front the requirement around face to face versus virtual contact**.**
* Due to other states ever-changing policies and updates due to COVID -19 guidelines, workers should check with the ICPC liaison to determine a receiving state’s requirements.

**Comment: Practice Guidance**

**The assessment of the relative or fictive kin caregiver’s home should contain adequate details to accurately depict the home environment, while completely capturing the caregiver’s ability to meet the basic needs of the child**

Can we include some language about providing a detailed rationale for approving placement when current or previously identified risk and safety factors are present?

The SSRP has revealed that while DCBS history is documented there is rarely documentation to convincingly explain how the decision was reach to place the child in light of that history.

**Response:** Summary and assessment at the end of the document should be used for providing additional information including a justification for the final decision.