

Statement of Consideration (SOC)

PPTL 22-12 SOP 4.9, 4.17, 4.18, 4.20, 13.9, Sibling Separation Memo, Waiver of Reasonable Efforts Checklist, Annual Permanency Hearing Tip Sheet, Case Planning Objectives OOHC Tip Sheet. 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 4.9 Initial Placement Consideration

1. **Comment:** Staff agree that sibling separation more than 45 days needs memo and approval. Foster parents with siblings, and adoptive parents of sibling should be contacted as first choice.

Response: SOP 4.9 states when an additional sibling enters out-of-home care (OOHC), assesses the possibility of placement with a birth sibling that is currently in foster care or has been previously adopted.

2. **Comment:** Staff feel that it should be added that relatives with placement of siblings and fictive kin with sibling placements should also be considered first.

Response: Number 9 of SOP 4.9 outlines the various placements that should be assessed individually based on the circumstances of the case. Least restrictive placements are always assessed first.

SOP 4.17 Preparation for and Completion of the Ten (10) Day Conference

1. **Comment:** Mailing case plan to AOC is new and will require a new process for workers and OSA.

Response: This has always been a requirement. This SOP edit only updated the address.

2. **Comment:** There should be a log for OSA and a contact entered when it is mailed.

Response: Yes the service recordings should document the case plan distribution. A regional protocol can be developed by each region that allows for this work process.

3. **Comment:** Inclusion of 2nd perm goal OOHC plan will be confusing to staff and needs clarification of when this is needed.

Response: Please see SOP 4.18 for more detailed information about concurrent planning.

4. **Comment:** Add Voluntary Affidavit of paternity form!!! May be the only time we get this and a legal/punitive father (would expedite the process later if case goes TPR)

Response: Some court jurisdictions do not recognize a voluntary affidavit of paternity. If this is allowable in your region please consult with OLS.

5. **Comment:** Bulletin point 4: please add the invite should include R&C worker (if applicable) even if home is going through training or home study process as an added support. Also include permanency specialists! Not the morning of the 10 day!

Response: SOP 4.16 outlines case plan participants.

6. **Comment:** I LOVE 7. That says to complete 191 and 192 forms!! Very helpful when writing summaries and for the child's future physical and mental health needs!! Maybe the DPP 189 completion as well would be helpful!

Response: This suggestion will be considered for future updates.

SOP 4.18 Ongoing Case Planning

1. **Comment:** Monthly visits with siblings needs to be documented in service recordings and completed on a visitation agreement- this needs to be added.

Response: SOP 4.19 visitation agreement outlines these requirements in detail.

SOP 4.20 Sibling Contact

1. **Comment:** Needs to include relative and fictive with siblings get priority- not just foster parents.

Response: Number 9 of SOP 4.9 outlines the various placements that should be assessed individually based on the circumstances of the case. Least restrictive placements are always assessed first.

2. **Comment:** It states that suspending sibling visits needs therapeutic statements- this will require all children to be in therapy- this is not always happening with children placed in DCBS homes, relatives or fictive placements.

Response: Visits should not be suspended unless there is a recommendation based upon therapeutic needs. Any pause in visitation should be the exception not the rule and should be re-evaluated on a continual basis. If there is a significant concern about visitation, referrals should be made for mental health treatment for all children in OOHC regardless of placement type.

3. **Comment:** It also mentions sibling separation template but needs more detail on what this is and when used.

Response: The template outlines that documentation supporting the separation needs to be included, the children's permanency and placement statuses, plans for future contact, placement histories, attempts to reunify the siblings, and the recommendation of treatment providers. The template should be completed at 45 calendar days, case

planning conferences, during significant changes in the case and when assessing for permanent sibling separation for adoption.

Case Planning Objectives OOHC Tip Sheet

1. **Comment:** Filing the court report 7 days in advance and the AOC -13 is new- it should be added that they need to be uploaded in ITWIST

Response: Follow process as outlined in case file digitization SOP.

Waiver of Reasonable Efforts Checklist

1. **Comment:** Staff think this is granted a lot and there is no follow up with OLS timely.

Response: It is the responsibility of the FSOS and SSW to ensure timely consultation with OLS. This should be discussed during ongoing case consults.

2. **Comment:** We get this granted on in home cases as well with children placed with relatives too quickly without showing our efforts.

Response: Quality service provision is important for all case types. We should be working with and advocating for all families.

3. **Comment:** I didn't see it really mention that Foster parents and R&C worker should be also involved to the FTM. This is where the partnership plan is to be developed with the FP/Parents. Or this the partnership plan not included in FTM any longer?

Response: SOP 4.16 outlines case plan participants including Cabinet staff and foster parents.