

## Statement of Consideration (SOC)

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.

1. **Comment:** Page 1, in the introduction: Suggest adding an actual timeframe for resolving disagreements regarding case responsibility instead of stating that they be resolved in a "timely manner."

**Response:** No change was made a result of this comment. The information in the introduction is a general overview of what the SOP section is about. The timeframe set forth for resolving a disagreement is lined out in procedural step #16.

2. **Comment:** Page 2, #1: Seems like it should be the responsibility of the receiving SSW to verify the new address of the family since the family has moved to the receiving SSW's county. The family's new address may not yet be registered with Family Support if they just moved and it would be difficult for the sending SSW to verify the address by making a visit several hours away.

**Response:** The word "verifies" has been changed to "obtains" to clarify.

3. **Comment:** Page 2, #1: Shouldn't there be a set number of days that a person can be in an emergency shelter before the case is eligible for transfer?

**Response:** The word "emergency" has been deleted and language has been added to Practice Guidance regarding when a case can be transferred if a client/family resides in a shelter. If a client resides in a shelter for more than thirty (30) days the case may be transferred.

4. **Comment:** Page 2, #2: It would be more appropriate if the sending FSOS contacted the receiving SRA and not have the sending SSW do it.

**Response:** Language has been changed to read that "the sending FSOS contacts the FSOS for the receiving county to provide notice of transfer."

5. **Comment:** Page 2, #3: This procedure seems to contradict number 13 (page 3) regarding when a case is accepted and what information must be included in order to accept the transfer. Clarification is needed.

**Response:** The case should be shared even if all information is not up to date so that services to the family are not delayed.

6. **Comment:** Page 2, #5: Please define what would constitute "missing required case documentation." Some things cannot be corrected if they are out of compliance, such as contact notes. If a case has six (6) months of missing contacts, but does have a current one, it will always be out of compliance. Is that something that would prevent the transfer of a case?

**Response:** No. Cases are transferred to provide services to families. Transfers are not rejected based on the quality of the sending county's work.

7. **Comment:** Page 2, #5: Should the "mediation period" mentioned in this step have a timeframe assigned to it so that it does not go on indefinitely?

**Response:** The timeframe is within 7 days. #5 was out of place in the draft and has been moved to become #16 in the final version.

8. **Comment:** Page 3, #11: Investigations should be given the timeframe already established in SOP of thirty (30) working days.

**Response:** The word "pending" has been deleted and replaced with the word "overdue."

9. **Comment:** Page 3, #12: Does the three (3) day time period for acceptance or denial of the transfer begin when the case is transferred in TWIST or when the FSOS physically receives the hard copy?

**Response:** Language has been added to clarify that the transfer is to be accepted within three days of the TWIST transfer. Language in this procedural step has also been revised to say that if all information is not included in the transfer request that the receiving FSOS contacts the sending FSOS in order to arrange the completion of missing information.

10. **Comment:** Page 3, #13: I have concerns about so much information being required before a case is **shared** with another county, particularly court screens, household members, ticklers, etc. This could delay service provision for families and a smooth transition if the family has already moved. Sometimes families flee or move quickly with no notice to the Cabinet and could be gone for several months before they are located. I understand the need to have all of this information before the case is **transferred** but a shared case need to have more liberal parameters. Sharing cases has not been going well among regions (per regional feedback). Were the #13 requirements meant to be for transferred cases rather than shared?

Another suggestion is accepting the case share immediately so as not to disrupt service provision with an agreement that the sending SSW completes the CQA, case plan, contacts, transfer summary, court screens, individual information and ticklers

within thirty days of the transfer.

**Response:** Language has been revised to state that "the receiving FSOS accepts the shared case in TWIST immediately upon receipt of the request."

The procedural step has been moved to #4 as it was out of order chronologically in the draft.

11. **Comment:** Page 3, #13: Many times, CQAs, case plans or home visits may be coming due just as the case is transferred. This places an undue burden on the sending worker if that family has already moved far away. Suggest adding a statement that if items such as this are due in the month that the transfer occurs who completes which task is negotiated between regions and that both sending and receiving staff (even if it's a share) work together to complete (could include conference calls etc.).

**Response:** The decision regarding how to handle completion of certain items that are coming due will be left to the discretion of the regions to work out, as there are many scenarios that can affect which worker should complete what documentation. Procedural step #15 addresses this comment.

12. **Comment:** Page 4, #21: This draft looks good. The only concern I have is #21 where it discusses court responsibility. It seems very vague and I think it will be a point of contention between counties. Would it be possible to clarify the level of responsibility and timeframes? Obviously the sending SSW would be responsible for court until the Adjudication hearing but what about hearings after that? Also, if the case is being sent and within two weeks there is a Disposition hearing, it would be the sending SSW's responsibility to complete that report since the other county would not have time to familiarize themselves with the family. I think most responsible counties will not have a problem with figuring this out but, let's face it there are plenty of counties that will argue and try to avoid additional work.

**Response:** Information has been added to Practice Guidance clarifying that if the case is transferred more than 45 miles away that the sending SSW keeps the case in court after adjudication and that the sending SSW sends a request to transfer the jurisdiction of the case to the receiving county.

13. **Comment:** Page 2, #3 and page 3, #19: I very much appreciate the spirit of the statement in #3, that services should be provided seamlessly upon the relocation of a family and that the receiving county/region is in the best proximity to initiate service provision.

However, #15 seems to state that the sending SSW is to maintain direct service provision to the child and resource parent until a case transfer is formally accepted by the receiving county/region. Is this best practice, logistically feasible when there are great distances between sending and receiving offices? Also, what about service delivery to the child's family (not just child and resource parent)? What am I missing/can you help me with this?

**Response:** This comment has been addressed within the edits to Practice Guidance. Information has been added to this section regarding issues of distance.

14. **Comment:** Page 6 in "Practice Guidance" under the "Onsite Services Request" section: Onsite Supervision needs its own section to place emphasis on the fact that this is not a voluntary. The following statement is on the tip sheet and should also be in the SOP at a minimum in practice guidance so it is readily seen:

**Onsite services** were formerly called courtesy supervision. The name was changed because "courtesy" implied it was optional for a county/region to provide these services for another region. It is not optional.

Additional language should also be added to spell out requirements for these cases (i.e. that home visits must occur monthly like in any other case, minimum of quarterly collateral contact, and contacts with the worker who has case responsibility etc.).

**Response:** This comment has been addressed through changes made to comment #10 and in the addition of Practice Guidance related to onsite services.

15. **Comment:** A case share should be accepted immediately, even if there are disagreements over the transfer for ongoing services. If a family moves a great distance away it is not feasible for the worker to continue providing services to a family.

**Response:** This edit has been made and moved to procedural step #4.

16. **Comment:** There is often disagreement over the residency of parents who are in jail. OLS has historically indicated that jails are not residences as people do not live there voluntarily so DPP has been sharing this viewpoint on investigations and cases. If this is the viewpoint of the agency this clarification should be made in the practice guidance to decrease confusion. The question comes up A LOT.

**Response:** There will not be a case transfer if a parent goes to jail. Practice Guidance has been added to clarify this point.

**17.Comment:** The jurisdiction and "transfer" issues that come up in investigations and FINSAs were not a part of this review but it seems like the information needs to be moved from SOP 9.7 Status Offender Services to SOP 2.10 Initiating the Report where other jurisdictional issues are discussed. This information was misplaced during the SOP redesign. This issue seems to come up weekly from staff looking for this information. There are many disagreements over who handles referrals particularly when there is an open case in one county but the parent/perpetrator has moved to another county. The oversight that is discussed in 30.9 Case Transfer needs to be reflected in SOP 2.10 once all the content is back together.

**Response:** We have added this information to Practice Guidance in SOP 2.10 Initiating the report and in SOP for APS.

**18.Comment:** Field staff have recommended that each region should have a point person designated by the SRA to handle transfer issues both in region and out of region to make sure these move along smoothly. This list of point persons would be shared with all regions and they could work directly with the Director of Service Regions (DSR) as needed. This would be very helpful as this draft SOP often discusses about communication between regions.

**Response:** Each county should utilize their chain of command in dealing with disputes.

**19.Comment:** The major problem I saw with this draft SOP is that receiving FSOS can refuse a case share. If the family has been proven to be living in the receiving county, then the least that county can do is accept the case share to ensure that no child is placed in harm's way or the risk for harm is not increased. If the case is not up to date or not ready to be transferred, the receiving county FSOS can review the case and make a request to the sending county FSOS to have the corrections in the case completed within a certain timeframe (i.e. 30 days). But no matter what, the family should not go longer than 30 days without services and the only way to ensure this occurs is for the receiving county to accept the case share, no matter what, as long as the family member has been found to be located in that county. The sending SSW and the receiving/courtesy SSW could make a visit to the family member's home together to ensure there is no question to whether or not the person is living there or not.

**Response:** Language has been revised to state that the shared case is accepted immediately. Services should not be delayed to a family based on missing information in the case file.

**20.Comment:** This policy reads as if it is referring to all transfers not just those from region to region. The way it looks, the SRA and Bruce Linder will be copied on all transfers (even across teams). The introduction refers to all transfers. #15 discusses county to county transfers and then #17 refers to region to region case transfers. This needs to be clarified.

**Response:** This SOP refers to all transfers; however, language has been revised to provide better guidance on any potential disagreements between regions.

**21.Comment:** Suggest adding content regarding how pending court cases from the sending county are handled.

**Response:** See the answer for comment #12.

**22.Comment:** Suggest including language that if a child is in care and the goal has been changed to adoption that the case should not transfer.

**Response:** Language will remain the same regarding case transfers after the goal is changed to adoption. TPR may not occur for several months after the goal is changed and the case may need to be transferred for various reasons.

**23.Comment:** Suggest that Bruce Linder only be included on transfer e-mails when there is a problem with the transfer that cannot be worked out between the regions.

**Response:** The Director of Service Regions is only notified when there is a disagreement; not on every case transfer. This has been revised on the final draft.