

## Policy and Practice Guidance Document (PPGD) #034 Concurrent Planning Policy and Practice Guide December 7, 2022

### Background

The Ohio Department of Job and Family Services (ODJFS) issued [FCL # 46 Concurrent Planning Implementation & Overview](#) on November 2, 2022, to support the implementation of concurrent planning as required by Amended Substitute House Bill 110 and is one of the 37 Children Services Transformation Advisory Council's 37 recommendations. FCL #047 outlined the timeline of events as well as resources to assist in the preparation for successful implementation of concurrent planning to be effective by January 2023.

### Purpose

The purpose of this PPGD is to reinforce the importance of concurrent planning. Additionally, this document is to provide caseworker's additional guidance for determining a concurrent plan objective, identifying services and activities in concurrent planning, and recording required information in Ohio SACWIS. Consultation with supervisory staff should occur when determining a concurrent plan objective.

Concurrent Planning is a process when caseworkers explore more than one permanent family solution at a time. Concurrent planning identifies an alternate permanency option in the event the primary permanency goal of reunification in the family case plan is not able to be achieved. Concurrent planning works to find the best plan for a child and their family while also striving toward timely permanency and is completed simultaneously alongside the primary permanency reunification efforts. The family assists in the development of their own concurrent plan. Concurrent planning encourages the engagement of relative/kin and assists the family with the best alternative for permanency if the primary goal of reunification cannot be achieved. This process promotes family/kin connections, by maintaining familial/kinship relationships or contacts with persons of significance in the child's life. The purpose of concurrent planning is to:

- ✓ Help shorten a young person's stay in a resource home.
- ✓ Achieve safe and timely permanency for children.
- ✓ Pursue all kinship options.
- ✓ Engage young people in their future.
- ✓ Support the young person's culture, school, and community relationships.
- ✓ Establish or maintain relationships with family and kin.
- ✓ "The concurrent plan guidance is not intended to be directive or provide instruction on correct or incorrect concurrent plans. This guidance is provided to assist in the casework process."

When engaging with the family, it is important to collaborate and allow the family to contribute to the concurrent plan. The concurrent plan can be flexible and can be updated as case circumstances change.

The ODJFS Concurrent Planning brochure, JFS 08009 can be accessed [HERE](#).

### **Revisions (rules and tools):**

[FCASMTL 513](#) *Private Child Placing Agency Case Plan & SAR for Concurrent Planning* and [FCASMTL 514](#) *Public Children Services Agency Case Plan & SAR for Concurrent Planning* were recently published. These transmittals inform the revisions to the following rules and tools which will become effective January 1, 2023:

- OAC 5101:2-38-07 entitled **PCPA Family Case Plan for Children in Custody or Under Protective Supervision.**
- OAC 5101:2-38-04 entitled **PCPA Requirements for Completing the Semiannual Administrative Review.**
- JFS 01416 Semiannual Administrative Review for Private Child Placing Agencies will be available through [Forms Central](#) on January 1, 2023.
- JFS 01416i Instructions for Completing JFS 01416, Semiannual Administrative Review for Private Child Placing Agencies will be available through [Forms Central](#) on January 1, 2023.
- OAC 5101:2-38-05 entitled **PCSA Family Case Plan for Children in Custody or Under Protective Supervision.**
- OAC 5101:2-38-10 entitled **PCSA Requirements for Completing the Semiannual Administrative Review.**

### **Concurrent Plan Requirement:**

All children in the temporary custody of a Public Children Services Agency (PCSA) or Private Child Placing Agency (PCPA) with the permanency case plan goal of reunification, must have a concurrent plan by the following dates:

Child in PCPA custody on or after January 1, 2023.	Concurrent plan required in family case plan.
Child in PCSA custody on or after December 15, 2022	Concurrent plan in family case plan.
Child in PCSA custody before December 15, 2022	Concurrent plan required by July 1, 2023
Child in PCPA custody before January 1, 2023	Concurrent plan required by July 1, 2023

Ohio SACWIS enhancements to the family case plan will go live on December 15, 2022, just prior to the effective date of the rule change. Due to the Ohio SACWIS build schedule this was the closest available production date to January 1, 2023.

As a result, children in the temporary custody of a PCSA prior to December 15<sup>th</sup>, 2022 and have a primary goal of reunification are not required to have a concurrent plan until July 1, 2023. However, if an update to the family case plan is needed prior to July 1, 2023, Ohio SACWIS will require the concurrent plan to be developed at the time of the update.

**Family Case Plan Enhancements in Ohio SACWIS:**

A concurrent plan is maintained within the family case plan > parties to the plan topic. Each child in the family case plan is required to have a concurrent plan when in the temporary custody of a PCSA/PCPA and the permanency goal is reunification. This documentation consists of each child’s individual concurrent plan objective and high-level descriptive narrative outlining services and activities to support the concurrent plan. The options for the concurrent plan objective are one of the following:

- legal custody to relative/kinship,
- adoption,
- independent Living / emancipation with family and kinship connections

The screenshot shows the 'Family Case Plan Topics' sidebar on the left with the following items:

- Update Information (UI) - Completed
- Parties to the Plan (PP) - Completed
- Strengths and Needs (SN) - Not Completed
- Concerns (SC) - Not Completed
- Placement Information (PI) - Not Completed
- Non-Custodial Parent Info (NCP) - Not Completed

The main content area is titled 'Child(ren) Participating in the Family Case Plan' and shows details for 'Charlesworth- Dewitt, Jimmy Chainsaw / 0000000'. The 'Child's Permanency Goal' dropdown menu is open, showing 'Reunification' selected, with a blue arrow pointing to it. Below this, the 'Concurrent Plan Objective' field is highlighted with a red box. The 'Describe the planned efforts...' text area is also highlighted with a red box and contains a blue 'ABC' button and the number '10000'.

## Semi-Annual Administrative Review Enhancements in Ohio SACWIS:

The concurrent plan is required to be reviewed during the Semiannual Administrative Review (SAR) until the child:

- has been reunified,
- is no longer in agency temporary custody,
- the permanency goal is no longer reunification,
- or the concurrent plan objective has been obtained.

SAR documentation should include:

- Review and documentation of services that are linked to support the concurrent plan.
- Review and documentation of activities that the relative/kinship provider has completed or is currently engaged in.
- Review and documentation of activities the child has completed or is currently engaged in.
- Review of family search and engagement efforts and description of individuals who are supporting the child.
- Documentation of any updates needed to the concurrent plan and explanation of what those updates will be.
- Documentation of reassessment of relative/kin who are unable to provide placement.

### *Permanency Planning Narrative*

CASE NAME / ID: <b>Smith, Person P / 0000000 [R]</b>	<i>Ongoing / Open (01/01/2014)</i>	
REVIEW TOOL: <b>Semiannual Administrative Review</b>	REVIEW FOR PLAN: <b>Initial Sept 22, 2016</b>	STATUS: <b>In Progress</b>
<b>Permanency Planning Narrative</b>		
Child Name: Smith, Tommy - Male, Age 6		
Is a Concurrent Plan for the child needed at this time? * 		
<input type="text" value="Yes"/>		
If the child is currently in Temporary Custody and the Case Plan Goal is Reunification, please identify the child's concurrent plan objective as one of the following: Custody to relative/kinship, Adoption, or Independent Living/Emancipation with family and kinship connections. In addition describe in detail the Concurrent Plan activities (including but not limited to potential placements, permanent connections and services being provided for Concurrent Planning:		
<a href="#">Expand Full Screen</a>		
<div style="border: 1px solid gray; height: 80px;"></div>		<input type="button" value="✓ ABC"/> <input type="button" value="10000"/>

**Permanency Planning Narrative**

CASE NAME / ID: *Smith, Person P / 0000000 [ R ]* *Ongoing / Open (01/01/2014)*

REVIEW TOOL: *Semiannual Administrative Review* REVIEW FOR PLAN: *Initial Sept 22, 2016* STATUS: *In Progress*

**Permanency Planning Narrative**

Child Name: *Smith, Tommy - Male, Age 6*

Describe the Agency's progress toward implementing the child's Concurrent Plan, including whether any updates are needed:

[Expand Full Screen](#)

✓ ABC  
10000

[Apply to Other Children](#)

Selecting an option below will override any existing responses

**Guidance and Practice:**

The chart below displays three columns to support agency practice when selecting a concurrent objective. These columns include the

- applicable factors that support selecting the concurrent plan objective,
- the activities and services that support the concurrent plan,
- narrative examples to help guide documentation.

Additional details about the concurrent plan can be documented in the SAR, activity Logs, or elsewhere in the case record as determined by each agency.

**The guidance provided is to assist in the casework process. Each concurrent plan should be individualized to meet the family's need and include efforts to locate family through family search and engagement. The selection of the concurrent plan objective should be influenced by case specific characteristics. Consultation with supervisory staff should occur when determining a concurrent plan objective.**

Concurrent Plan Objective – Legal Custody to Relative or Kin Caregiver		
<i>Applicable factors that support concurrent plan:</i>	<i>Activities and services to support the concurrent plan:</i>	<i>Sample concurrent plan narrative:</i>

<p>Relative/Kin have not been identified.</p> <p>Relative/Kin have not been located.</p> <p>Relative/Kin family search engagement efforts have not been exhausted.</p>	<ul style="list-style-type: none"> <li>• Agency and family will continue to search for appropriate relatives or kin connections.</li> <li>• Agency will continue intensive family search and engagement activities.</li> <li>• Contact and assess relatives as they are identified. If relative cannot be initially approved reassess as necessary.</li> </ul>	<p>A concurrent plan is being developed in partnership with your family to help achieve permanency for your child. The agency will continue to search for permanent placement, respite, and supports for your child. All efforts will be discussed with your family and documented in the case record. As a result of concurrent planning, the agency will conduct intensive family search activities to locate relative/kin connections and possible placement resources for the family. Efforts will include discussions with the parent, non-custodial parent, guardian or custodian and child, if age appropriate and the use of web-based search engines. All possible kinship/relative options identified through these efforts will be contacted and assessed for the ability to provide placement or be a positive connection. The agency will continue family search and engagement until the child reunifies or finds permanency. Once relative/kin are located efforts will focus on sustaining the relationship between the relative/kin and the child. The caseworker will document all efforts to locate, engage and connect relative/kin with the child in the case record.</p> <p><b>Resource:</b>  <a href="#">A guide to conducting intensive family search and engagement can be found <b>HERE</b>.</a></p>
<p>Relative/Kin have been identified &amp; located.</p> <p>Relative/kin have contact/visitation.</p> <ul style="list-style-type: none"> <li>• relative/kin have relationship with child</li> </ul> <p>Relative/kin willing to provide respite as needed.</p>	<ul style="list-style-type: none"> <li>• Relative/kin have been located as a permanent placement option if reunification cannot occur. Agency will assist the relative/kin and child with services and resources to support placement.</li> <li>• Educate relative about permanent placement options, including but not limited to <i>Kinship Guardianship</i></li> </ul>	<p>A concurrent plan is being developed in partnership with your family to help achieve permanency for your child. As a result of concurrent planning the agency has identified relative/kin to support the child and family during placement. Conversations and assessments by the caseworker will occur to determine if the relative/kin can provide a safe and appropriate placement for the child. Caseworker will also assist the child in sustaining relationships with relative/kin as part of the family search and engagement process.</p>

	<p><i>Assistance Program (KGAP), public assistance programs, child support and local resources to assist families.</i></p> <ul style="list-style-type: none"> <li>• Relatives have been assessed and are willing to provide respite services to current placement provider and parents.</li> </ul>	
<p>Relative/kin are a placement resource.</p> <ul style="list-style-type: none"> <li>• Relative/kin considering placement of child in home.</li> <li>• Child is placed in relative/kin home.</li> <li>• Relative/Kin has agreed or is considering being a permanent placement for the child.</li> </ul>	<ul style="list-style-type: none"> <li>• Relative/kin have been located as a permanent placement option if reunification cannot occur. Agency will assist the relative/kin and child with services and resources to support placement.</li> <li>• Educate relative about permanent placement options, including but not limited to KGAP, public assistance programs, child support and local resources to assist families.</li> <li>• If foster parents seek or are granted legal custody by the court, agency will educate foster parents on KGAP, public assistance programs, child support and local resources to assist families.</li> </ul>	<p>A concurrent plan is being developed in partnership with your family to help achieve permanency for your child. As result of concurrent planning, the agency has completed intensive family search and engagement searches and located a permanent placement option with relative/kin if reunification cannot occur. The agency will continue ongoing discussions to assess the ability and willingness of the relative/kin to be a permanent placement option for the child if primary reunification efforts are unsuccessful. The current caregiver will be informed of responsibilities including providing lifelong permanency for the child. Relative/kinship providers will also be informed of supports such as Kinship Guardianship Assistance Program (KGAP), public assistance, child support and local resources.</p> <p><b>Resource:</b>  <a href="#">Kinship Guardianship Assistance Program (KGAP) may apply. KGAP resources can be found within FCL #043 - Kinship Guardianship Assistance Program (KGAP) Rules and Forms Updates</a></p>

<b>Concurrent Plan Objective - Adoption</b>		
<i>Applicable factors that support concurrent plan:</i>	<i>Activities and services to support the concurrent plan:</i>	<i>Sample concurrent plan narrative:</i>
<p>A safe and approved relative/kin have not been identified or located for the child’s care and placement.</p> <p>Intensive family search and engagement efforts have been exhausted.</p> <p>Child is in a placement setting and there are no known/relative kinship options available.</p> <p>The agency has filed or intends to file for permanent custody of the child for the purposes of adoption.</p>	<ul style="list-style-type: none"> <li>• Provide Information and explore permanency options with current caregivers to determine if adoption or legal custody is in the child’s best interest.</li> <li>• Continue family search and engagement activities and explore ability/willingness of placement with any relative/kin. Concurrent plan will be updated if relative/kin becomes a viable option.</li> <li>• If no relative/kin are identified to accept legal custody, the agency will seek adoption if reunification efforts are not successful.</li> </ul>	<p>A concurrent plan has been developed to help achieve permanency for your child. Currently, the agency is seeking permanent custody as relative/kin placement options have not been identified or located for the child. Relative/Kin search and engagement efforts have been exhausted. Currently there is not a safe and appropriate relative/kin for the child’s placement therefore, adoption is the concurrent plan objective, and the child is in an approved foster home. The agency will continue searching for relative/kin and determine if any persons identified can provide a safe and appropriate placement for the child. Efforts to locate an adoptive family will begin if the agency is granted permanent custody. Until permanent custody is granted family search and engagement efforts will continue. The agency will evaluate any possible relative/kinship options located through these efforts. The current foster family and relative/kin caregivers will be considered as possible adoption matches.</p>

<b>Concurrent Plan Objective – Independent Living/Emancipation with family and kinship connections:</b>		
<i>Applicable factors that support concurrent plan:</i>	<i>Activities and services to support the concurrent plan:</i>	<i>Sample concurrent plan narrative:</i>
<p>This selection should only be used if <u>all</u> efforts to locate kinship/relatives for placement have been exhausted and there are no viable placement options</p>	<ul style="list-style-type: none"> <li>• Agency has exhausted search efforts for relative/kin placement options.</li> <li>• Continue family search and engagement activities to explore the</li> </ul>	<p>A concurrent plan has been developed with the family to assist in achieving permanency for the youth. Agency will continue supporting efforts to find or establish permanent family and kinship connections to assist the child with living independently. Youth does not wish to be adopted and the agency has not been able to locate any suitable relative/kin</p>

<p>with relative/kin for permanency.</p> <p>Continued efforts by the agency to provide the child with family and kinship connections are a priority.</p> <p>The child demonstrates viable independent living skills and is preparing to live independently.</p> <p>Child is sixteen years or older. <u>ORC 5101: 2-42-68 (D)(3)</u></p> <ul style="list-style-type: none"> <li>Family search and engagement efforts should continue until agency custody is terminated.</li> </ul>	<p>ability of relative/kin to permanent connections</p> <ul style="list-style-type: none"> <li>Youth does not wish to be adopted.</li> <li>Youth will be assisted with an independent living plan and services. The independent living plan will be documented in the case record.</li> <li>Agency will provide or refer the youth to independent living services to assist in self-sufficiency.</li> <li>Agency will work with relatives or kin who are able to provide independent living support as an alternative to placement option.</li> </ul>	<p>for permanency. However, relative/kin have been identified as connections for the child and are willing to provide ongoing support to the youth. Family search and engagement efforts will continue until custody is terminated. Child will continue visits with biological family and relative/kin as arranged by agency.</p> <p><b>Resource:</b> Access to the independent living toolkit can be found <a href="#">HERE</a>.</p>
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**Intensive Efforts to Locate Family/Kin-Are these efforts ever exhausted?**

<p>Ohio Revised Code section 2151.4116 describes the intensive efforts that must be made to locate and engage willing relative/kin for a child. Identifying and locating relatives (both maternal and paternal)/kin should begin at the case opening to evaluate potential placement options if necessary and/or provide positive supports for the child. Diligent efforts to identify, locate, inform and evaluate relatives (both maternal and paternal)/kin continue until custody is terminated or permanency is achieved.</p>
<p><b>Section 2151.4116- Intensive efforts required for locating and engaging kinship caregiver.</b> <a href="#">Link to ORC HERE</a></p>
<p>A public children services agency or private child placing agency shall make intensive efforts to identify and engage an appropriate and willing kinship caregiver for a child who is in:</p> <ul style="list-style-type: none"> <li>Temporary custody of the agency.</li> <li>A planned permanent living arrangement (PPLA) with the agency.</li> </ul>

### When does the court review intensive efforts to find relatives/kin?

At every court hearing regarding a child in the temporary custody or PPLA of the agency, the court shall determine whether the public children services agency or private child placing agency has continued intensive efforts to identify and engage appropriate and willing kinship caregivers for the child.

#### **Section 2151.4117- Court Review of Intensive Efforts**

[Link to ORC HERE](#)

At each hearing the court will:

- Review the placement of the child to determine if the child is receiving care in the home of a kinship caregiver.
- Review the efforts of the agency since the previous hearing to place the child with a kinship caregiver, including efforts to utilize search technology (including but not limited to Genpro, Accurint, social media, Vinelink, etc.) to find biological family members for the child.
- If previous court orders were made under section 2151.4118 of the Revised Code the court will review those orders to determine if the order should continue based on the child's current placement situation.

### How does the court order continuation of placement with a current caregiver?

The court may order the continuation of placement with the current caregiver and consider the current caregiver as having a kin relationship to the child. If the court has made this finding, then continued intensive efforts to identify and engage appropriate and willing kinship caregivers may be unnecessary. However, the agency may continue to search and evaluate kinship caregivers as a potential placement option or permanent positive support.

Below are the Ohio Revised Codes to help guide agencies in decision making when the court has made this finding.

#### **Section 2151.4118 -Court determination intensive efforts not required.**

[Link to ORC HERE](#)

A court may issue an order that determines, with respect to a child in the temporary custody of the agency or in a PPLA with the agency, *who is not receiving care in the home of a kinship caregiver*:

- That the continuation of the child's current placement is in the child's best interest, and
- That intensive efforts to identify and engage an appropriate and willing kinship caregiver for the child are unnecessary if the court makes all the findings pursuant to section [2151.4119](#) of the Revised Code.

**Section 2151.4119 | Findings supporting court determination.**

[Link to ORC HERE](#)

A court may issue an order continuing the placement of the child, if continued placement is in the child's best interest, and that intensive efforts to identify and engage kinship caregivers are unnecessary, if it finds all the following:

- The child has been living in a stable home environment with the child's current caregivers for the past twelve consecutive months.
- The current caregivers have expressed interest in providing permanency for the child.
- The removal of the child from the current caregivers would be detrimental to the child's emotional well-being.

**Section 2151.4120 Current caregiver equal to kin regarding permanency.**

[Link to ORC HERE](#)

Finding Foster parent as Kin:

- If a court makes the findings under section 2151.4119 of the Revised Code, the court and public children services agency or private child placing agency may consider the child's current caregiver as having a kin relationship with the child and at an equal standing to other kin regarding permanency.

**Section 2151.4121 | Disqualifying kin unwilling or not interested in providing permanency.**

[Link to ORC HERE](#)

- If a relative who received the required notice pursuant to section 2151.33 of the Revised Code (a guardian, custodian, all adult grandparents, and other adult relatives of the child, including any adult relatives suggested by the parents).
- Fails within six months from the date of receipt of the notice to demonstrate interest in and willingness to provide a permanent home for a child, a court may excuse the public children services agency or private child placing agency from considering such relative for placement.
- If the court has issued an order under section 2151.4119 of the Revised Code.

**Section 2151.4122 | Continued search to locate and engage kinship caregiver permitted.**

[Link to ORC HERE](#)

- Nothing in sections 2151.4115 to 2151.4121 of the Revised Code shall be construed to prevent a public children services agency or private child placing agency from continuing to search or consider kinship caregivers.

**Contacts:**

For more information regarding concurrent planning, please contact CPS policy:

Kristin Adkins- [Kristin.adkins@jfs.ohio.gov](mailto:Kristin.adkins@jfs.ohio.gov)

Renee Lupi- [Lupi-Renee.Lupi@jfs.ohio.gov](mailto:Lupi-Renee.Lupi@jfs.ohio.gov)