



August 22, 2022

**Family, Children and Adult Services Procedure Letter No. 393**

**TO:** Family, Children and Adult Services Manual Holders

**FROM:** Matt Damschroder, Director

**SUBJECT:** Rule Relaxations for PCSA Workforce

**BACKGROUND**

The Ohio Department of Job and Family Services (ODJFS) is issuing this Procedure Letter to allow flexibility in child welfare casework practice requirements to provide relief to the workforce.

The children services workforce is an essential piece of achieving the best outcomes for Ohio's children and families. Historically, turnover rates in public children services agencies (PCSA) exceed typical work environments, and the current environment accentuates recruitment and retention challenges. Because of these challenges, workforce has been, and continues to be, a critical priority for ODJFS.

In the interest of reducing organizational red tape, ODJFS has thoroughly considered multiple recommendations from county partners to determine practice requirements that can be temporarily relaxed while continuing to ensure child safety and meet Ohio Revised Code requirements.

These workforce relaxation strategies will be effective from September 1, 2022 through August 31, 2023.

**SUMMARY**

An attached document provides a detailed summarization of each approved workforce strategy, explaining the subsequent impact it may have on programming, Ohio SACWIS, and reporting. The following outlines the summary of the approved strategies:

**Assessment/Investigation Strategies**

- Allowable virtual face-to-face visits with other involved adults
- Additional time for documentation of the safety assessment waiver
- Suspend 5-day contact requirement under certain circumstances

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**Ongoing Case Planning and Review Strategies**

- Remove requirement for completion of the reunification assessment
- Extension of 90-day case review completion
- Remove requirement for each substitute caregiver for treatment foster homes
- Allow supplementary workers to complete exit interviews
- Exclude required medical screening for children discharged from a medical setting

**Administrative Strategies**

- Extended hours allowed for rules training
- Remove letter of Assurance

**In Process Strategies** – *Revisions and development are in progress and require extended time to achieve.*

- Condensed family assessment tool when no safety threat is present
- Streamline information in CAPM tools and navigation in Ohio SACWIS

**ADDITIONAL**

Further communication will be forthcoming including a guidance document to assist with consistent implementation of relaxation strategies, as well as information on how Ohio SACWIS, reporting, monitoring, and technical assistance may be impacted.

If you would like to submit additional strategies to support the workforce, please have one representative from your agency complete this [form](#) that will be reviewed and considered on an ongoing basis.

**INSTRUCTIONS:**

The following chart indicates what materials should be removed from the Family, Children and Adult Services Manual (FCASM) and what materials are to be inserted in the FCASM.

<b>LOCATION</b>	<b>REMOVE AND FILE AS OBSOLETE</b>	<b>INSERT/REPLACEMENT</b>
PROCEDURE LETTERS		FCASPL 393



## 1. Assessment/Investigation Strategies

Resource	Strategy
Franklin	Virtual face-to-face - increase the allowance for virtual contacts with other involved adults, adults outside of ACV home.
ODJFS Instruction	<b>Immediately Actionable</b> Adults outside of the home of the ACV do not require face-to-face visits. Face-to-face interviews are required to be completed for other involved adults living in the home of the ACV.
OAC Rule	Rule 5101:2-36-03 PCSA requirements for intra-familial child abuse and/or neglect assessment/investigations. <a href="#">Rule 5101:2-36-03 - Ohio Administrative Code   Ohio Laws</a> (O) The PCSA shall conduct and document face-to-face interviews with the alleged perpetrator and all adults residing in the home of the alleged child victim, unless law enforcement or the county prosecutor will interview the alleged perpetrator pursuant to the procedures delineated in the county child abuse and neglect memorandum of understanding, in order to: (1) Assess his or her knowledge of the allegation. (2) Observe the interaction between the alleged child victim and caretaker. (3) Obtain relevant information regarding the safety and risk to the child.  OAC requires face-to-face contact with children and adults residing in the home only. Rule does not prohibit alternative forms of contact with other involved adults outside of the ACV home.
Ohio SACWIS	NA - Nothing in Ohio SACWIS prevents this.
Reporting	There is no impact to reports. OIAs will have no impact. The Comprehensive Visitation Report only considers children eligible for visits on Assessment/Investigation cases open more than 65 days and adults on a case plan if one exists. Counties that use Crystal reports may be impacted.
Champaign	Align safety assessment waiver with written document (waiver due by working day 10 if appropriate contact attempts met).
ODJFS Instruction	<b>Actionable</b> The requirement to document the waiver in SACWIS on day 4 is to be completed by working day 10.
OAC Rules	5101:2-37-01 PCSA Requirements for completing the safety assessment. <a href="#">Rule 5101:2-37-01 - Ohio Administrative Code   Ohio Laws</a> (H)(1) (1) Create and approve a request to extend the completion time frame prior to the expiration of the fourth working day time frame from the date the report was screened in as a child abuse, neglect, or dependency report pursuant to rule <a href="#">5101:2-36-11</a> of the Administrative Code.
Ohio SACWIS	Ohio SACWIS does not enforce that the extension justification is completed timely. (The system does not update the action item for this extension because the extension due date is not fixed in rule).
Reporting	Datamart and ROM only record the extension/waiver regardless of the date. Reports only record the date of the safety assessment waiver and do not use the

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Resource	Strategy
	date for calculations. No change required. Counties that use Crystal reports may be impacted.
<b>Champaign</b>	Change/suspend 5-day contact requirement if parent is refusing contact and complaint has been filed with the Court.
<b>ODJFS Instruction</b>	<b>Actionable</b> If the PCSA has filed a complaint in Juvenile Court, the PCSA does not have to make face-to-face attempts every five working days if the parent is refusing contact.
<b>OAC Rules</b>	5101:2-36-03 PCSA requirements for intra-familial child abuse and/or neglect assessment/investigations. <a href="#">Rule 5101:2-36-03 - Ohio Administrative Code   Ohio Laws</a> (G) If the attempted face-to-face contacts with the alleged child victim, as specified in paragraphs (D) and (F) of this rule are unsuccessful, the PCSA shall, at a minimum, continue making attempts for face-to-face contact at least every five working days until the child is seen or until the PCSA is required to make a report disposition pursuant to paragraph (V) or (W) of this rule.  (Y) The PCSA shall request assistance from the county prosecutor, the PCSA's legal counsel, and/or the court if refused access to the alleged child victim or any records necessary to conduct the assessment/investigation.
<b>Ohio SACWIS</b>	An action item will continue to appear. The PCSA can ignore or dismiss 5-day action item.
<b>Reporting</b>	The Intake Lifecycle report has a column for face-to-face attempts but does not measure compliance of the 5-day contact requirement. The 5-day contact requirement value is captured on the Intake Assessment/Investigation Face-to-Face Contact Report but a large majority of the records currently are not meeting the 5-day contact rule. Counties that use Crystal reports may be impacted.

## 2. Ongoing Case Planning and Review Strategies



Resource	Strategy
<b>Champaign</b>	Remove CAPMIS reunification assessment tool and requirements.
<b>ODJFS Instruction</b>	<b>Actionable</b> All requirements to complete a Reunification Assessment are waived. This has been the plan pending the CAPM revisions. The Reunification Assessment will be removed in the future.
<b>OAC Rules</b>	5101:2-37-04 PCSA requirements for completing the reunification assessment. <a href="#">Rule 5101:2-37-04 - Ohio Administrative Code   Ohio Laws</a>

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	<p>5101:2-42-87 Termination of substitute care and custody of a child. <a href="#">Rule 5101:2-42-87 - Ohio Administrative Code   Ohio Laws</a> (A) Each public children services agency (PCSA) shall determine the necessity for continuing or terminating custody of a child in a legally authorized placement for thirty days or more, whether the child's custody is by agreement or court order or whether the child's custody status is temporary or permanent. The agency shall assess the need for continued custody at least every three months from date of initial placement and at each semiannual administrative review by completing the following: (1) The case review pursuant to rule <a href="#">5101:2-38-09</a> of the Administrative Code. (2) The "Reunification Assessment" pursuant to rule <a href="#">5101:2-37-04</a> of the Administrative Code. (3) Consider whether supportive services can provide adequate protection for the child if he or she were returned to his or her own home under a court order of protective supervision, or the agency's involvement is no longer deemed necessary, and termination is sought.</p>
<b>Ohio SACWIS</b>	Ohio SACWIS will not prevent this as there is no requirement to complete the Reunification Assessment per functionality.
<b>Reporting</b>	The only impact would be to the actual tool. There are no additional reports using this data. Counties that use Crystal reports may be impacted.
<b>ODJFS</b>	Case review completion requirements are extended to be completed once every 180 days instead of every 90 days.
<b>ODJFS Instruction</b>	<p><b>Actionable</b></p> <p>Case review completion requirements are extended to be completed once every 180 days instead of every 90 days. The case review is required to be completed with the semi-annual administrative review.</p>
<b>OAC Rules</b>	<p>5101:2-38-09 PCSA requirements for completing the case review. <a href="#">Rule 5101:2-38-09 - Ohio Administrative Code   Ohio Laws</a> (C) The PCSA shall continue to complete the "Case Review" no later than every ninety days from the date established pursuant to paragraph (A) of this rule. The PCSA may review cases utilizing the "Case Review" more frequently based upon PCSA policy or if the PCSA determines case circumstances require it.</p> <p>5101:2-42-87 Termination of substitute care and custody of a child. <a href="#">Rule 5101:2-42-87 - Ohio Administrative Code   Ohio Laws</a> (A) Each public children services agency (PCSA) shall determine the necessity for continuing or terminating custody of a child in a legally authorized placement for thirty days or more, whether the child's custody is by agreement or court order or whether the child's custody status is temporary or permanent. The agency shall assess the need for continued custody at least every three months from date of initial placement and at each semiannual administrative review by completing the following: (1) The case review pursuant to rule <a href="#">5101:2-</a></p>

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	<p><a href="#">38-09</a> of the Administrative Code. (2) The "Reunification Assessment" pursuant to rule <a href="#">5101:2-37-04</a> of the Administrative Code. (3) Consider whether supportive services can provide adequate protection for the child if he or she were returned to his or her own home under a court order of protective supervision, or the agency's involvement is no longer deemed necessary, and termination is sought.</p>
<b>Ohio SACWIS</b>	<p>Ohio SACWIS will not prevent this. SAR will indicate it is not compliant, but the SAR can still be approved.</p> <p>Per Ohio SACWIS rules, there must be one Case Review completed and approved to complete/approve the SAR as information pulls from the CR to SAR. There will be a "warning" in the tool if only one CR completed. Action items in Ohio SACWIS would need to remain but users have the ability to delete the action items.</p>
<b>Reporting</b>	<p>Rpt 485 calculates case review due dates, days overdue, and 3-month approval time stamp. This report will be impacted. AFCARS requires the date of the periodic review and can have a null value. Counties that use Crystal reports may be impacted.</p>
<b>Champaign</b>	<p>Remove required contact each week with caregiver for treatment foster care placements.</p>
<b>ODJFS Instruction</b>	<p><b>Actionable</b></p> <p>PCSAs may have a non-assigned caseworker or case aid to make bi-weekly contacts; between face-to-face requirements.</p>
<b>OAC Rules</b>	<p>5101:2-42-65 Caseworker visits and contacts with children in substitute care. <a href="#">Rule 5101:2-42-65 - Ohio Administrative Code   Ohio Laws</a> (B) Visits and contacts shall be conducted by a caseworker within the PCSA or PCPA that has full responsibility for case planning and case management of the child's case. (1) If the caseworker responsible for the child's case is unable to complete the visit, the caseworker completing the visit shall document in the child's case the reason someone other than the assigned caseworker visited the child. (2) The caseworker assigned to the child's case shall complete the majority of the required monthly visits. (3) The PCSA or PCPA, as part of a managed care agreement as defined in rule <a href="#">5101:2-1-01</a> of the Administrative Code, may contract with another agency to have the managed care caseworker assume responsibility for the child's case and caseworker visits required by this rule.</p>
<b>Ohio SACWIS</b>	<p>Ohio SACWIS doesn't prevent this.</p>
<b>Reporting</b>	<p>This is not used for any visitation reports; doesn't look at caregiver. Scan completed to ensure there is no impact.</p>
<b>Champaign</b>	<p>Change requirements for who can conduct exit interview to allow case aides to do this.</p>

## ODJFS WORKFORCE STRATEGIES

<b>ODJFS Instruction</b>	<b>Actionable</b> PCSA's may permit case aides to conduct exit interviews.
<b>OAC Rules</b>	5101:2-42-65.1 Exit interviews when a child is custody leaves an out of home placement. <a href="#">Rule 5101:2-42-65.1 - Ohio Administrative Code   Ohio Laws</a> (A) The public children services agency (PCSA) or private child placing agency (PCPA) that holds custody of a child shall conduct a face-to-face exit interview with every child age five and older, as developmentally appropriate, within seven days after the child's exit from each foster care placement. (1) The interview shall be completed by an individual allowed to make caseworker visits in accordance with rule <a href="#">5101:2-42-65</a> of the Administrative Code.
<b>Ohio SACWIS</b>	Ohio SACWIS doesn't prevent this.
<b>Reporting</b>	Exit interview reports may be impacted. Parameter page has a search that can be used. There is a workaround. Counties that use Crystal reports may be impacted.
<b>Champaign</b>	Change requirement for screening within 5 days of placement/placement change to exclude any child being placed upon discharge from a hospital or medical setting (exception already exists for newborns).
<b>ODJFS Instruction</b>	<b>Actionable</b> The requirement for screening within 5 days of placement/placement change is extended to be completed within the first month (30 days) from the date of placement.
<b>OAC Rules</b>	5101:2-42-66.1 Comprehensive health care for children in placement. <a href="#">Rule 5101:2-42-66.1 - Ohio Administrative Code   Ohio Laws</a> (C) The PCSA or PCPA shall ensure a medical screening is completed within five working days of each child entering into substitute care or when a child's placement changes to prevent possible transmission of common childhood communicable diseases and to identify any symptoms of illness, injury, or maltreatment. A screening is not required for newborn children directly placed into substitute care from the hospital. The medical screening shall be conducted by one of the following: (1) A licensed physician. (2) An advanced practice nurse. (3) A registered nurse. (4) A licensed practical nurse. (5) A physician's assistant.
<b>Ohio SACWIS</b>	Ohio SACWIS doesn't prevent this.
<b>Reporting</b>	May impact Ongoing Lifecycle report. AFCARS element 22 will not be negatively affected. Counties that use Crystal reports may be impacted.

## 3. Administrative



Resource	Strategy
Champaign	Extended hours allowed for rules training (currently capped at 6).
ODJFS Instruction	<p><b>Actionable</b></p> <p>The six hours of rules training cap pursuant to OAC rule 5101:2-33-55 paragraph (N)(3) is extended to permit 12 hours.</p>
OAC Rules	<p>5101:2-33-55 Education And in-service training requirements for PCSA caseworkers. <a href="#">Rule 5101:2-33-55 - Ohio Administrative Code   Ohio Laws</a> (N) A caseworker's ongoing in-service training requirements may be fulfilled by participating in a variety of training activities. These training activities may include training offered by any of the following:</p> <p>(1) OCWTP. (2) Ohio human services training system (OHSTS). (3) Ohio department of job and family services (ODJFS). <b>Up to six hours of rules training may be counted toward meeting the continuing education training requirement.</b> (4) Accredited colleges or universities if the course work is relevant to the caseworker's assigned duties. When calculating in-service training hours through completion of courses offered by colleges or universities, the PCSA shall use the number of semester/quarter hours awarded by the college or university as indicated on the college or university transcript. (5) Seminars, conferences and workshops relevant to the caseworker's assigned duties.</p>
Ohio SACWIS	NA
Reporting	NA
ODJFS	Remove, or suspend, letter of Assurance for PCSAs requirement.
ODJFS Instruction	<p><b>Actionable</b></p> <p>PCSAs are not required to submit a letter of Assurance pursuant to rule OAC 5101:2-40-02 (W).</p>
OAC Rules	<p>5101:2-40-02 Supportive Services for prevention of placement, reunification and life skills. <a href="#">Rule 5101:2-40-02 - Ohio Administrative Code   Ohio Laws</a> (W) The director of the PCSA shall be responsible for submitting a letter to the appropriate Ohio department of job and family services (ODJFS) field office by January first of every year containing the following assurances:</p>
Ohio SACWIS	N/A
Reporting	N/A





**4. In Process – Requires extended time to accomplish**

Recommending Agent	Strategy	Recommendation
<p><b>Franklin Champaign ODJFS</b></p>	<p>Abbreviated Family Assessment in situations where no safety threat has been identified (consider completion of actuarial tool only and if actuarial is high or intensive risk require completion of full tool)</p>	<p>This is a recommendation that is being considered through the revision of the actuarial risk assessment tool. The current actuarial tool could not be used for this in its current state. Work planned to begin in Fall 2022.</p>
<p><b>Champaign ODJFS</b></p>	<p>Identify redundancies and excessive navigation through screens in CAPM tools</p>	<p>Actionable and in process:                      Safety Assessment is live April 14th - Safety Reassessment in Case Review live April.                      Family Assessment under revision currently.                      Reunification Assessment to be removed.                      Ongoing Case Assessment Investigation Tool to be removed.                      Specialized Assessment Investigation slated for revision in future (2023-2024)                      Automated Systems evaluation of redundancies and systems use planned for tools, forms, and requirements.</p>