



August 24, 2023

Family, Children and Adult Services Procedure Letter No. 408

TO: Family, Children and Adult Services Manual Holders

FROM: Matt Damschroder, Director

SUBJECT: Supported Rule and Practice Strategies for Public and Private Certified and Approved Agencies

Background

The workforce challenges of public and private agencies continue to be a critical priority for ODJFS. In the interest of reducing organizational red tape and improving efficiency, ODJFS thoroughly considered multiple recommendations from county partners to determine practice requirements that can be reduced while ensuring child safety and continuing to meet Ohio Revised Code and federal requirements. In addition, some of the strategies were implemented to increase efficiency during the COVID19 pandemic. In review of results of the strategies, it has been determined that child safety and permanency were not compromised.

ODJFS issued Family, Children and Adult Services Procedure Letter No. 394 ([FCASPL 394 - Rule and Practice Relaxations for Public and Private Certified and Approved Agencies](#)) on August 22, 2022, to allow flexibility for identified rule and practice requirements to provide relief for Public and Private Certified and Approved Agencies' workforce. These approved strategies became effective September 1, 2022, and were set to end August 31, 2023.

Summary

Following the issuance of FCASPL No. 394, ODJFS continued to accept additional suggested strategies to support the workforce and increase efficiency from our public and private partners. ODJFS closely reviewed each recommendation to ensure child safety, while cross-referencing federal requirements and the Ohio Revised Code. From those recommendations, additional strategies have been approved and supported by ODJFS.

To allow time for ODJFS to revise the corresponding Ohio Administrative Code (OAC) rules, all supported strategies identified in this procedure letter will be effective immediately and will continue until each OAC rule is effectuated. Furthermore, ODJFS will be making the necessary revisions to automated systems and reports for each of the supported strategies. Once rules are effectuated, automated systems and reporting will review and address the policy changes through design sessions. ODJFS will continue collaboration with stakeholders to pursue additional recommendations moving forward without the immediate support within automated systems and reporting. ODJFS continuously reviews all projects and initiatives to prioritize for Ohio SACWIS implementation.

Non-rule Impacted ODJFS Procedures
Agencies that recommend foster homes:

- Licensing Specialists will coordinate with agency staff to jointly conduct visits to foster homes

whenever possible.

- Licensing Specialists will conduct no more than 4 foster home visits per agency review unless otherwise determined by OFC.

All Agency Types:

- ODJFS may conduct record reviews through electronic method rather than onsite if the agency’s technology/filing system allows for this approach. ODJFS may conduct the Reconciliation electronically rather than onsite if results of compliance appropriately allow a virtual meeting or phone call option.

Ohio Administrative Code (OAC) Rule-Impacted Procedures

Residential Facilities:

- The required number of residential staff training hours before being left alone with children is reduced from 40 hours (20 orientation and 20 additional hours) to 20 hours of orientation training and completion of CPR and First Aid before residential staff can be left alone with children. The additional 20 hours of training is to be completed within an employee’s first year of employment.
- [OAC Rule 5101:2-9-02 Staffing Requirements](#) paragraph (M)(1-3).

Agencies that recommend foster homes:

- Agency training plans are to be submitted to ODJFS within 90 days if a change to the training plan has occurred.
- [OAC Rule 5101:2-5-13 Required Agency Policies, Plans, and Procedures](#) paragraph (B)(4).
- [OAC rule 5101:2-5-40 Preplacement and Continuing Training Programs](#) paragraph (B).

Please be advised the following procedures will end on August 31, 2023:

Non-rule Impacted ODJFS Procedures

Agencies that recommend foster homes:

- Conducting home visits in a virtual manner will end on August 31, 2023. Efforts will return to conducting home visits in-person, unless ODJFS identifies extenuating circumstances to conduct a virtual home visit.

All Function Types except Residential Functions:

- All additional visits during non-recertification years for any function type of certification other than residential will be reinstated after August 31, 2023.

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.

LOCATION	REMOVE AND FILE AS OBSOLETE	INSERT/REPLACEMENT
PROCEDURE LETTERS	FCASPL 394	FCASPL 408