



West Virginia Child Care Association

West Virginia Child Care Association  
1 United Way Square, Charleston, WV 25301  
[www.wvcca.org](http://www.wvcca.org) 304-340-3611

July 26, 2017

Linda Watts, Acting Commissioner  
Bureau for Children and Families  
350 Capitol Street, Room 730  
Charleston, West Virginia 25301

Dear Acting Commissioner Watts:

Providers and members within the West Virginia child-serving community are committed to providing support to all West Virginia children in care. Members of the West Virginia Child Care Association are committed to partnering with public and private child-serving agencies to support recommendations that advance and assist the continued health and well-being of all West Virginia's children.

The WV Chapter of FFTA submitted proposed changes to the Child Placing Agencies Licensure (copy attached). The West Virginia Child Care Association supports the enclosed comments and proposed changes provided by the members of the FFTA. We look forward to our continued public-private partnership and thank you for your dedication to your continued commitment to West Virginia children and families.

Respectfully,

Katrina Harmon  
Executive Director  
[director@wvcca.org](mailto:director@wvcca.org)

On behalf of the memberships of the following organizations:

West Virginia Child Care Association  
Academy Programs  
Board of Child Care, Inc.  
Burlington United Methodist Family Services  
Cammack Children's Center  
Community Action Southwest - Try-Again Homes  
Family Connections  
Golden Girl, Inc.  
Highland Hospital  
National Youth Advocate Program  
Pressley Ridge  
ResCare - Braley & Thompson  
River Park Hospital  
Stepping Stone, Inc.  
Stepping Stones, Inc.

RECEIVED  
2017 JUL 26 P 2:17  
GENERAL MAIL  
OFFICE OF THE COMMISSIONER  
CHILDREN AND FAMILIES

## West Virginia Child Placing Regulations

### FFTA Comment Submission

3.69 “confidentially” needs to be “confidentiality”

3.73: Strike “Statement of Criminal Record” Retitle it the Self-Disclosure Application and Consent Form

4.1.c. “A license is transferable by the agency.” We would like some clarification on that this is really meant to pertain to. In 4.1.d. – it goes on to refer to a transfer due to name change, was this the intention in c? Perhaps this sentence could better reflect the intention.

4.2.b.3. Could a definition for “fitness determination” be provided so that individuals/agencies will know some of the parameters of what will be accepted and denied?

4.4 Our current licenses no longer show a list of the specific services an agency is approved to provide, so when there is an amendment to a license- where will the change be reflected?

5.2 Could some language be added to this section pertaining to the investigations being completed in a timely manner.

5.2.b. Strike out “a Resident”

5.4.b.3. Can there be an explanation included in this section pertaining to the duration of the waiver or variances? Waivers are typically for a particular circumstance and would end upon that particular reason being rectified or child leaving the home versus a variance in which we get granted to have something changed on an on-going basis.

7.4 Would like this to read “An agency shall submit an application to the WV CARES unit of the Department and receive a fitness determination of eligibility or variance on each potential employee prior to the employee working ALONE with children.

8.1.d. Can any consideration be given to the supervision of homefinders to include supervisors who have a related Master’s Degree in a human service field with 5 or more years experience in the field? Many agencies have supervisors who hold related Master’s degrees and have worked for years in the child welfare and have proven their ability to make sound clinical judgements regarding foster parent applicants and home openings/denials.

8.2.a. Can this read “An agency shall require that all DIRECT CARE employee...” Otherwise, employees such as secretaries, are required to learn about direct case management duties that they do not have a need to know.

8.4.b. Would like to leave in the requirement to collect a Child Abuse and Neglect History Form.

8.4.c. Would like this to read “An agency shall require that volunteers have a medical screening by a qualified medical practitioner and a tuberculosis test with negative results, or a screening assessment stating no risk prior to providing services to children

9.3.c.1. Would like this to state that if a physical exam has been done within 30 days of placement, if documentation can be provided this would be accepted. We at times run into circumstances where they

THE STATE OF TEXAS  
OFFICE OF THE COMMISSIONER  
CHILDREN AND FAMILIES

2017 JUL 26 P 2:17

RECEIVED



July 25, 2017

RE: Written Comments for Proposed Changes to WV Child Placing Agencies Licensure

Dear Commissioner Watts;

The WV Chapter of FFTA met for a review of the proposed changes to the Child Placing Agencies Licensure (red line copy attached). Enclosed, please find the comments and proposed changes as agreed upon by the FFTA group comprised of:

- B & T
- BUMFS
- Community Action Southwest (TAH)
- Children's Home Society
- Genesis
- KVC
- NECCO
- Potomac Center
- Pressley Ridge
- WV Youth Advocate Program

We appreciate your review and consideration of our comments and proposals. Should you have any further questions for the group pertaining to our submission, please feel free to contact the Chapter Chair- Melinda Meredith, MA with Community Action Southwest at [mmeredith@caswg.org](mailto:mmeredith@caswg.org).

Sincerely,  
Melinda Meredith, MA  
WV State Supervisor  
WV FFTA Chapter Chair

## West Virginia Child Placing Regulations

### FFTA Comment Submission

3.69 “confidentially” needs to be “confidentiality”

3.73: Strike “Statement of Criminal Record” Retitle it the Self-Disclosure Application and Consent Form

4.1.c. “A license is transferable by the agency.” We would like some clarification on that this is really meant to pertain to. In 4.1.d. – it goes on to refer to a transfer due to name change, was this the intention in c? Perhaps this sentence could better reflect the intention.

4.2.b.3. Could a definition for “fitness determination” be provided so that individuals/agencies will know some of the parameters of what will be accepted and denied?

4.4 Our current licenses no longer show a list of the specific services an agency is approved to provide, so when there is an amendment to a license- where will the change be reflected?

5.2 Could some language be added to this section pertaining to the investigations being completed in a timely manner.

5.2.b. Strike out “a Resident”

5.4.b.3. Can there be an explanation included in this section pertaining to the duration of the waiver or variances? Waivers are typically for a particular circumstance and would end upon that particular reason being rectified or child leaving the home versus a variance in which we get granted to have something changed on an on-going basis.

7.4 Would like this to read “An agency shall submit an application to the WV CARES unit of the Department and receive a fitness determination of eligibility or variance on each potential employee prior to the employee working ALONE with children.

8.1.d. Can any consideration be given to the supervision of homefinders to include supervisors who have a related Master’s Degree in a human service field with 5 or more years experience in the field? Many agencies have supervisors who hold related Master’s degrees and have worked for years in the child welfare and have proven their ability to make sound clinical judgements regarding foster parent applicants and home openings/denials.

8.2.a. Can this read “An agency shall require that all DIRECT CARE employee...” Otherwise, employees such as secretaries, are required to learn about direct case management duties that they do not have a need to know.

8.4.b. Would like to leave in the requirement to collect a Child Abuse and Neglect History Form.

8.4.c. Would like this to read “An agency shall require that volunteers have a medical screening by a qualified medical practitioner and a tuberculosis test with negative results, or a screening assessment stating no risk prior to providing services to children

9.3.c.1. Would like this to state that if a physical exam has been done within 30 days of placement, if documentation can be provided this would be accepted. We at times run into circumstances where they come from family and they have already had an exam and then the medical card will not pay for another exam.

9.3.c.2. & 9.3.c.3. Could these read that an examination must be scheduled within the first 30 days instead of occurring within the first 30 days. We have run into situations where our local optometrists and dentists are so booked, they cannot get new clients in within 30 days of us calling to schedule. This is particularly hard in more rural areas where we are limited in our providers.

9.4.f.5. We would like this whole entry to be removed. If something must be left in, we would like to recommend it be changed to "If parents or guardians wish to revoke consent for a medication, an MDT will be held to have an informed discussion regarding the medication." We feel it is a huge liability for parents to have the ability to revoke medication that a doctor prescribed. We have to assume the physician would not have prescribed it unless it was for the well-being of the child. Some medications cannot be simply stopped, they need to be tapered, etc, for the health and safety of the child.

9.5.b. We would like this removed. We feel it is a liability issue for all parties. We believe the intent behind this statement is to ensure that foster parents (and thus agencies) are ensuring opportunity for the child to attend a religious service of his or her choice (as noted in 9.5.c.). We believe it is a liability and could open up opportunities for foster parents to be discriminated against based upon their religious with the way this is written. During emergency calls for placement, particularly on-call, workers are not going to know the religious background of each parent to disclose this. Also, there is concern that by disclosing the foster parent's religion this could open up the biological parents being able to find the church the family attends and in some circumstances this could present a problem.

9.7.a.6.b. We would like for this to read that Foster/Adoptive parents are required to report to use of crisis intervention skills and techniques and that Direct care Staff are required to write and submit the incident report.

12.1 We would like to remove "laws and forms" as handbooks are meant to be guidelines and quick tools to reference, these are not full resource manuals. We would like to be able to provide information and copies of laws and forms as any manner we see fit and at appropriate junctures as needed.

12.5.d. misspelling- "additional information that is not available at the time of placement, will be provided as obtained by the agency;"

13.6.a. Should read Prior to approval, all household member age 18 and over be subject to the provisions of the WV Cares Act....

13.6.b. Could this be re-worded to state that Foster/Adoptive parents must report any juvenile offenses committed by their minors in the home on a continual basis....

15.17.b. This section appears to be covered in 15.17.a by statement that the foster parents will use reasonable and prudent parenting standards in relation to exposing the children to animals in the home. If this statement must remain in here, we would like clarification on what documentation must be present to provide evidence that children have been instructed?

15.20.a. We would like this be removed. We believe in relation to all of the discussion on swimming pools, hot tubs, and spas that safety can be achieved in a variety of ways and do not require a 4 foot fence or barrier. Use of the other listed measures such as safety devices, locks, bolts, alarms, etc. would be sufficient.

16.3.p. Would like this to read "An account of the agency's discussion with the adoptive parents about open adoption and being open with the child pertaining to their adoption."

78-2-18- Strike this section, it is repetitive and covered in 78-2-17

19.1.c. Would like to add in the topic "adoption" to the list

20.1.a. Retitle to be Orientation & Pre-Service Training.

20.1.b. Remove "Pre-Service Training." This section is in relation to Annual In-Service Training. Further, we would like to remove the statement that all pre-service training must be face to face. It appears PRIDE may be moving to partial on-line components and technology is increasingly becoming an important tool and can be valuable with training. Most agencies agree most training is completed face to face but do not want to knock out opportunities to use on-line tools if they are valuable. If the DHHR would like to limit the use, can be % face to face and a % on-line.

21.1.a. Can we change the language to state that "Prior to proceeding with the placement, the agency shall give all known and available information on the child to the prospective foster parents." The use of the word "complete" is not possible to achieve by DHHR or agencies.



# West Virginia Treatment Initiative

*Providing treatment, care, and guidance for West Virginia's at-risk children*

July 26, 2017

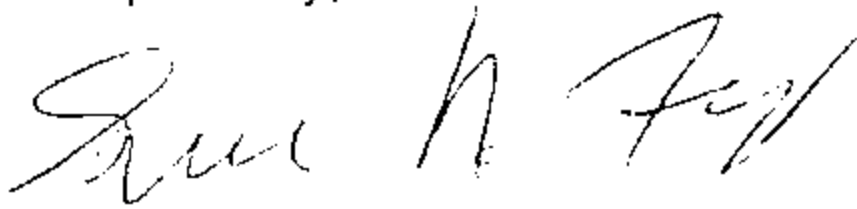
Linda Watts, Acting Commissioner  
Bureau for Children and Families  
350 Capitol Street, Room 730  
Charleston, West Virginia 25301

Dear Acting Commissioner Watts:

Providers and members within the West Virginia child-serving community are committed to providing support to all West Virginia children in care. Members of the West Virginia Treatment Initiative are committed to partnering with public and private child-serving agencies to support recommendations that advance and assist the continued health and well-being of all West Virginia's children.

The WV Chapter of FFTA submitted proposed changes to the Child Placing Agencies Licensure (copy attached). The West Virginia Treatment Initiative supports the enclosed comments and proposed changes provided by the members of the FFTA. We look forward to our continued public-private partnership and thank you for your dedication to your continued commitment to West Virginia children and families.

Respectfully,



On behalf of the memberships of the following organizations:

West Virginia Treatment Initiative  
Academy Programs  
Board of Child Care, Inc.  
Burlington United Methodist Family Services  
Cammack Children's Center  
Community Action Southwest - Try-Again  
Davis Stuart  
Elkins Mountain Schools  
Family Connections  
Pressley Ridge  
St. Johns Home for Children  
Stepping Stone, Inc.  
Stepping Stones, Inc.

STATE OF TEXAS  
OFFICE OF THE COMMISSIONER  
CHILDREN AND FAMILIES

2017 JUL 26 P 2:17

RECEIVED

## West Virginia Child Placing Regulations

### FFTA Comment Submission

3.69 “confidentially” needs to be “confidentiality”

3.73: Strike “Statement of Criminal Record” Retitle it the Self-Disclosure Application and Consent Form

4.1.c. “A license is transferable by the agency.” We would like some clarification on that this is really meant to pertain to. In 4.1.d. – it goes on to refer to a transfer due to name change, was this the intention in c? Perhaps this sentence could better reflect the intention.

4.2.b.3. Could a definition for “fitness determination” be provided so that individuals/agencies will know some of the parameters of what will be accepted and denied?

4.4 Our current licenses no longer show a list of the specific services an agency is approved to provide, so when there is an amendment to a license- where will the change be reflected?

5.2 Could some language be added to this section pertaining to the investigations being completed in a timely manner.

5.2.b. Strike out “a Resident”

5.4.b.3. Can there be an explanation included in this section pertaining to the duration of the waiver or variances? Waivers are typically for a particular circumstance and would end upon that particular reason being rectified or child leaving the home versus a variance in which we get granted to have something changed on an on-going basis.

7.4 Would like this to read “An agency shall submit an application to the WV CARES unit of the Department and receive a fitness determination of eligibility or variance on each potential employee prior to the employee working ALONE with children.

8.1.d. Can any consideration be given to the supervision of homefinders to include supervisors who have a related Master’s Degree in a human service field with 5 or more years experience in the field? Many agencies have supervisors who hold related Master’s degrees and have worked for years in the child welfare and have proven their ability to make sound clinical judgements regarding foster parent applicants and home openings/denials.

8.2.a. Can this read “An agency shall require that all DIRECT CARE employee....” Otherwise, employees such as secretaries, are required to learn about direct case management duties that they do not have a need to know.

8.4.b. Would like to leave in the requirement to collect a Child Abuse and Neglect History Form.

8.4.c. Would like this to read “An agency shall require that volunteers have a medical screening by a qualified medical practitioner and a tuberculosis test with negative results, or a screening assessment stating no risk prior to providing services to children

9.3.c.1. Would like this to state that if a physical exam has been done within 30 days of placement, if documentation can be provided this would be accepted. We at times run into circumstances where they

BUREAU FOR  
CHILDREN AND FAMILIES  
OFFICE OF THE COMMISSIONER

2017 JUL 26 P 2:17

RECEIVED

come from family and they have already had an exam and then the medical card will not pay for another exam.

9.3.c.2. & 9.3.c.3. Could these read that an examination must be scheduled within the first 30 days instead of occurring within the first 30 days. We have run into situations where our local optometrists and dentists are so booked, they cannot get new clients in within 30 days of us calling to schedule. This is particularly hard in more rural areas where we are limited in our providers.

9.4.f.5. We would like this who entry to be removed. If something must be left in, we would like to recommend it be changed to "If parents or guardians wish to revoke consent for a medication, an MDT will be held to have an informed discussion regarding the medication." We feel it is a huge liability for parents to have the ability to revoke medication that a doctor prescribed. We have to assume the physician would not have prescribed it unless it was for the well-being of the child. Some medications cannot be simply stopped, they need to be tapered, etc, for the health and safety of the child.

9.5.b. We would like this removed. We feel it is a liability issue for all parties. We believe the intent behind this statement is to ensure that foster parents (and thus agencies) are ensuring opportunity for the child to attend a religious service of his or her choice (as noted in 9.5.c.). We believe it is a liability and could open up opportunities for foster parents to be discriminated against based upon their religious with the way this is written. During emergency calls for placement, particularly on-call, workers are not going to know the religious background of each parent to disclose this. Also, there is concern that by disclosing the foster parent's religion this could open up the biological parents being able to find the church the family attends and in some circumstances this could present a problem.

9.7.a.6.b. We would like for this to read that Foster/Adoptive parents are required to report to use of crisis intervention skills and techniques and that Direct care Staff are required to write and submit the incident report.

12.1 We would like to remove "laws and forms" as handbooks are meant to be guidelines and quick tools to reference, these are not full resource manuals. We would like to be able to provide information and copies of laws and forms as any manner we see fit and at appropriate junctures as needed.

12.5.d. misspelling- "additional information that is not available at the time of placement, will be provided as obtained by the agency;"

13.6.a. Should read Prior to approval, all household member age 18 and over be subject to the provisions of the WV Cares Act....

13.6.b. Could this be re-worded to state that Foster/Adoptive parents must report any juvenile offenses committed by their minors in the home on a continual basis....

15.17.b. This section appears to be covered in 15.17.a by statement that the foster parents will use reasonable and prudent parenting standards in relation to exposing the children to animals in the home.

BUREAU FOR  
CHILDREN AND FAMILIES  
OFFICE OF THE COMMISSIONER

2017 JUL 26 P 2:17

RECEIVED

If this statement must remain in here, we would like clarification on what documentation must be present to provide evidence that children have been instructed?

15.20.a. We would like this be removed. We believe in relation to all of the discussion on swimming pools, hot tubs, and spas that safety can be achieved in a variety of ways and do not require a 4 foot fence or barrier. Use of the other listed measures such as safety devices, locks, bolts, alarms, etc. would be sufficient.

16.3.p. Would like this to read "An account of the agency's discussion with the adoptive parents about open adoption and being open with the child pertaining to their adoption."

78-2-18- Strike this section, it is repetitive and covered in 78-2-17

19.1.c. Would like to add in the topic "adoption" to the list

20.1.a. Retitle to be Orientation & Pre-Service Training.

20.1.b. Remove "Pre-Service Training." This section is in relation to Annual In-Service Training. Further, we would like to remove the statement that all pre-service training must be face to face. It appears PRIDE may be moving to partial on-line components and technology is increasingly becoming an important tool and can be valuable with training. Most agencies agree most training is completed face to face but do not want to knock out opportunities to use on-line tools if they are valuable. If the DHHR would like to limit the use, can be % face to face and a % on-line.

21.1.a. Can we change the language to state that "Prior to proceeding with the placement, the agency shall give all known and available information on the child to the prospective foster parents." The use of the word "complete" is not possible to achieve by DHHR or agencies.

BUREAU FOR  
CHILDREN AND FAMILIES  
OFFICE OF THE COMMISSIONER

2017 JUL 26 P 2:17

RECEIVED





www.wvcca.org

West Virginia Child Care Association  
1 United Way Square, Charleston, WV 25301  
[www.wvcca.org](http://www.wvcca.org) 304-340-3611

July 26, 2017

Linda Watts, Acting Commissioner  
Bureau for Children and Families  
350 Capitol Street, Room 730  
Charleston, West Virginia 25301

Dear Acting Commissioner Watts:

Providers and members within the West Virginia child-serving community are committed to providing support to all West Virginia children in care. Members of the West Virginia Child Care Association are committed to partnering with public and private child-serving agencies to support recommendations that advance and assist the continued health and well-being of all West Virginia's children.

The WV Chapter of FFTA submitted proposed changes to the Child Placing Agencies Licensure (copy attached). The West Virginia Child Care Association supports the enclosed comments and proposed changes provided by the members of the FFTA. We look forward to our continued public-private partnership and thank you for your dedication to your continued commitment to West Virginia children and families.

Respectfully,

Katrina Harmon  
Executive Director  
[director@wvcca.org](mailto:director@wvcca.org)

On behalf of the memberships of the following organizations:

West Virginia Child Care Association  
Academy Programs  
Board of Child Care, Inc.  
Burlington United Methodist Family Services  
Cammack Children's Center  
Community Action Southwest - Try-Again Homes  
Family Connections  
Golden Girl, Inc.  
Highland Hospital  
National Youth Advocate Program  
Pressley Ridge  
ResCare - Braley & Thompson  
River Park Hospital  
Stepping Stone, Inc.  
Stepping Stones, Inc.

DEPARTMENT OF  
CHILDREN AND FAMILIES  
OFFICE OF THE COMMISSIONER

2017 JUL 26 P 2:17

RECEIVED

## West Virginia Child Placing Regulations

### FFTA Comment Submission

3.69 “confidentially” needs to be “confidentiality”

3.73: Strike “Statement of Criminal Record” Retitle it the Self-Disclosure Application and Consent Form

4.1.c. “A license is transferable by the agency.” We would like some clarification on that this is really meant to pertain to. In 4.1.d. – it goes on to refer to a transfer due to name change, was this the intention in c? Perhaps this sentence could better reflect the intention.

4.2.b.3. Could a definition for “fitness determination” be provided so that individuals/agencies will know some of the parameters of what will be accepted and denied?

4.4 Our current licenses no longer show a list of the specific services an agency is approved to provide, so when there is an amendment to a license- where will the change be reflected?

5.2 Could some language be added to this section pertaining to the investigations being completed in a timely manner.

5.2.b. Strike out “a Resident”

5.4.b.3. Can there be an explanation included in this section pertaining to the duration of the waiver or variances? Waivers are typically for a particular circumstance and would end upon that particular reason being rectified or child leaving the home versus a variance in which we get granted to have something changed on an on-going basis.

7.4 Would like this to read “An agency shall submit an application to the WV CARES unit of the Department and receive a fitness determination of eligibility or variance on each potential employee prior to the employee working ALONE with children.

8.1.d. Can any consideration be given to the supervision of homefinders to include supervisors who have a related Master’s Degree in a human service field with 5 or more years experience in the field? Many agencies have supervisors who hold related Master’s degrees and have worked for years in the child welfare and have proven their ability to make sound clinical judgements regarding foster parent applicants and home openings/denials.

8.2.a. Can this read “An agency shall require that all DIRECT CARE employee...” Otherwise, employees such as secretaries, are required to learn about direct case management duties that they do not have a need to know.

8.4.b. Would like to leave in the requirement to collect a Child Abuse and Neglect History Form.

8.4.c. Would like this to read “An agency shall require that volunteers have a medical screening by a qualified medical practitioner and a tuberculosis test with negative results, or a screening assessment stating no risk prior to providing services to children

9.3.c.1. Would like this to state that if a physical exam has been done within 30 days of placement, if documentation can be provided this would be accepted. We at times run into circumstances where they

DEPT. OF  
CHILDREN AND FAMILIES  
OFFICE OF THE COMMISSIONER

2017 JUL 26 P 2:17

RECEIVED

come from family and they have already had an exam and then the medical card will not pay for another exam.

9.3.c.2. & 9.3.c.3. Could these read that an examination must be scheduled within the first 30 days instead of occurring within the first 30 days. We have run into situations where our local optometrists and dentists are so booked, they cannot get new clients in within 30 days of us calling to schedule. This is particularly hard in more rural areas where we are limited in our providers.

9.4.f.5. We would like this who entry to be removed. If something must be left in, we would like to recommend it be changed to "If parents or guardians wish to revoke consent for a medication, an MDT will be held to have an informed discussion regarding the medication." We feel it is a huge liability for parents to have the ability to revoke medication that a doctor prescribed. We have to assume the physician would not have prescribed it unless it was for the well-being of the child. Some medications cannot be simply stopped, they need to be tapered, etc, for the health and safety of the child.

9.5.b. We would like this removed. We feel it is a liability issue for all parties. We believe the intent behind this statement is to ensure that foster parents (and thus agencies) are ensuring opportunity for the child to attend a religious service of his or her choice (as noted in 9.5.c.). We believe it is a liability and could open up opportunities for foster parents to be discriminated against based upon their religious with the way this is written. During emergency calls for placement, particularly on-call, workers are not going to know the religious background of each parent to disclose this. Also, there is concern that by disclosing the foster parent's religion this could open up the biological parents being able to find the church the family attends and in some circumstances this could present a problem.

9.7.a.6.b. We would like for this to read that Foster/Adoptive parents are required to report to use of crisis intervention skills and techniques and that Direct care Staff are required to write and submit the incident report.

12.1 We would like to remove "laws and forms" as handbooks are meant to be guidelines and quick tools to reference, these are not full resource manuals. We would like to be able to provide information and copies of laws and forms as any manner we see fit and at appropriate junctures as needed.

12.5.d. misspelling- "additional information that is not available at the time of placement, will be provided as obtained by the agency;"

13.6.a. Should read Prior to approval, all household member age 18 and over be subject to the provisions of the WV Cares Act....

13.6.b. Could this be re-worded to state that Foster/Adoptive parents must report any juvenile offenses committed by their minors in the home on a continual basis....

15.17.b. This section appears to be covered in 15.17.a by statement that the foster parents will use reasonable and prudent parenting standards in relation to exposing the children to animals in the home.

BUREAU FOR  
CHILDREN AND FAMILIES  
OFFICE OF THE COMMISSIONER

2017 JUL 26 P 2:17

RECEIVED

If this statement must remain in here, we would like clarification on what documentation must be present to provide evidence that children have been instructed?

15.20.a. We would like this be removed. We believe in relation to all of the discussion on swimming pools, hot tubs, and spas that safety can be achieved in a variety of ways and do not require a 4 foot fence or barrier. Use of the other listed measures such as safety devices, locks, bolts, alarms, etc. would be sufficient.

16.3.p. Would like this to read "An account of the agency's discussion with the adoptive parents about open adoption and being open with the child pertaining to their adoption."

78-2-18- Strike this section, it is repetitive and covered in 78-2-17

19.1.c. Would like to add in the topic "adoption" to the list

20.1.a. Retitle to be Orientation & Pre-Service Training.

20.1.b. Remove "Pre-Service Training." This section is in relation to Annual In-Service Training. Further, we would like to remove the statement that all pre-service training must be face to face. It appears PRIDE may be moving to partial on-line components and technology is increasingly becoming an important tool and can be valuable with training. Most agencies agree most training is completed face to face but do not want to knock out opportunities to use on-line tools if they are valuable. If the DHHR would like to limit the use, can be % face to face and a % on-line.

21.1.a. Can we change the language to state that "Prior to proceeding with the placement, the agency shall give all known and available information on the child to the prospective foster parents." The use of the word "complete" is not possible to achieve by DHHR or agencies.

BUREAU FOR  
CHILDREN AND FAMILIES  
OFFICE OF THE COMMISSIONER

2017 JUL 26 P 2:17

RECEIVED