



Virginia Commission on Youth 2016 Legislative Studies and Initiatives

Virginia’s Adoption Home Study Process **PUBLIC COMMENTS IN RED**

Findings/Conclusions	Recommendations and Public Comments
<p>Finding 1 – The Mutual Family Assessment template is the preferred format for use in approving provider families.</p>	<p>1. Introduce a bill to mandate the Mutual Family Assessment home study and addendum developed by the Virginia Department of Social Services as a uniform home study format for statewide use among local departments of social services. Provide flexibility to allow the Virginia Department of Social Services to update this format in the future when necessary.</p> <p>- or -</p> <p>2. Introduce a bill to mandate the Mutual Family Assessment home study and addendum developed by the Virginia Department of Social Services as a uniform home study format for statewide use among local departments of social services and licensed child placing agencies. Provide flexibility to allow the Virginia Department of Social Services to update this format in the future when necessary.</p> <p><u>PUBLIC COMMENTS</u></p> <p>IN SUPPORT</p> <p>HopeTree Family Services supports option 1. HopeTree believes that option 1 would eliminate the barrier faced when families moves from one locality to another or wish to adopt a child from outside their locality.</p> <p>C2Adopt prefers option 2 over option 1 stating that if a format is to be required, it should apply to any agency doing home study assessments.</p>

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	<p>Their comments also stress the importance of training and that the content of the home study, and not the format, is the most important part.</p> <p>The Virginia Association of Licensed Child Placing Agencies (VALCPA) supports option 1.</p> <p>NewFound Families is supportive of either of these options.</p> <p>IN OPPOSITION</p> <p>HopeTree Family Services opposes option 2. HopeTree indicates that there is no issue in the sharing of home studies from a private to a public agency and that the current guidelines already ensure that the home study will address all necessary information.</p> <p>HopeTree also states that “mandating a minimal format would be a step back for many agencies and mandating one specific maximum format would be costly and burdensome for most agencies.” “Many private agencies have invested a multitude of resources into trauma-informed models of mutual family assessment which are in line with best practices and have strong evidence base.”</p> <p>Families choose an agency based on their expertise including preparation, training, and customer service.</p> <p>Ronnie Gehring, MSW, Embrace Treatment Foster Care, and Virginia Association of Licensed Child Placing Agencies (VALCPA) at-large board member opposes option 2. Mr. Gehring explains that certain agencies are able to give themselves a competitive advantage by using more detailed home studies. Additionally, the use of a uniform home study could result in a loss of vital information being learned about a prospective parent.</p> <p>The Virginia Chapter of the Family Focused Treatment Association (FFTA) expresses concern about option 2. Their comments state that mandating a uniform home study would restrict licensed child placing agencies from being creative and utilizing evidenced-based, new practices in a timely and resourceful manner.</p>

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	<p>The FFTA proposes an alternative approach where LCPA's would be required to use a state-created Mutual Family Home Study, but also have permission to add their specific agency logo and any additional materials deemed important. Finally, the FFTA requests that the state not change any home study form without six months' notice and consultation with licensed child placing agencies about the proposed changes. The Up Center agrees with all of the FFTA's comments.</p> <p>The Family Foundation opposes option 2. They state that this recommendation would be an unnecessary burden and that private agencies should be free to exercise flexibility in their studies according to the needs of each adoption.</p> <p>The Virginia Association of Licensed Child Placing Agencies (VALCPA) expresses concern about option 2 because it would prevent agencies from being able to utilize evidence-based practices and individualized home study formats.</p> <p>The Virginia Catholic Conference opposes option 2 and states that a uniform home study will not effectively meet the needs of licensed child placing agencies that are doing home studies for different types of adoptions including infant adoption, international adoption, parental placement adoption, interstate adoption and relative adoption.</p> <p>Furthermore, the Virginia Catholic Conference explains, "it is reasonable to require Child Placement Agencies that are providing home study services for local DSS's to meet the same requirements, although it is very important that requirements for other types of adoption and foster care services have the necessary flexibility to meet international/contract requirements and specific needs of children and adopting families."</p> <p>Donna Sayegh, a citizen of Portsmouth, opposes options 1 and 2 and recommends the Department of Social Services instead creates a "Family Group Decision Making" Committee in its Family Services Division.</p>

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	<p>GENERAL COMMENTS</p> <p>Commonwealth Catholic Charities states the importance of having flexibility to home studies. Commonwealth Catholic Charities reminds the Commission that agencies provide a wide range of home study services including international, interstate, relative, and parental placement adoptions. Additionally, Commonwealth Catholic Charities states that the training emphasis is different for each type of adoption.</p> <p>Commonwealth Catholic Charities adds that it is reasonable to require child placing agencies that are providing home studies for local departments of social services to follow the same requirements, but otherwise it does not make sense.</p> <p>Anna Koehle, MA, HS-BCP, Bethany Christian Services of Virginia, elaborates on Bethany’s use of Structured Analysis Family Evaluation (SAFE) home studies across all branches in 37 states. According to Ms. Koehle “the SAFE studies have set a higher standard of practice for the workers and allow us to get much more accurate information on the families.”</p> <p>Rebekah Hall, Catholic Charities of Eastern Virginia, comments that she is available to describe her experiences using the SAFE home study format and non-SAFE formats.</p>
<p>Finding 2 – There is no statewide database of current foster families, and agencies are unable to verify if an applicant has previously applied to be a resource family.</p>	<p>1. Support the Virginia Department of Social Services in its acquisition and implementation of a new comprehensive child welfare computer system. Ensure the ability of a case worker to make an intake query to see if an applicant family has previously applied to be an adoptive, foster, resource, respite family at another agency.</p> <p>PUBLIC COMMENTS</p> <p>IN SUPPORT</p> <p>C2Adopt supports this recommendation noting that it is helpful to know “if a family has been through the process before, what issues might have created barriers, and what steps have been taken to remedy those barriers.” C2Adopt also adds that it is useful to know if a family is working with more than one agency at a time.</p>

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	<p>NewFound Families supports this recommendation believing that it will be beneficial to the background check process. NewFound Families also states that a comprehensive child welfare information system “will also allow the Virginia Department of Social Services to have a means for contacting families to alert them to vital information that can keep parents current on training, code changes, services available to them, as well as important emergency alerts, if necessary.”</p> <p>IN OPPOSITION</p> <p>Donna Sayegh opposes this recommendation for safety and financial reasons.</p>
<p>Finding 3 – Parents have two rights of appeal in certain domestic relations cases including termination of parental rights.</p>	<p>1. Request the Virginia Bar Association’s Virginia Family Law Coalition study the implications of the removal of the right to appeal, to Circuit Court from Juvenile and Domestic Relations District Court, certain cases involving termination of parental rights. Relevant Code of Virginia Section: (§ 16.1-296(D)).</p> <p>As part of this study, look to the concept of having Juvenile and Domestic Relations District Courts become courts of record for matters involving child custody and termination of parental rights. This could be accomplished by requiring court reporters be present in these specific proceedings with appeals going directly to the Virginia Court of Appeals.</p> <p><u>PUBLIC COMMENTS</u></p> <p>IN SUPPORT</p> <p>Deborah Fitzgerald, Family Services Manager, Danville DSS, supports this recommendation. She describes a couple of scenarios where children wait over a year on appeals hearings alone.</p> <p>C2Adopt supports any effort to study and or implement making the Juvenile and Domestic Relations Court a court of record in issues of termination of parental rights.</p> <p>The York-Poquoson Department of Social Services supports this recommendation. The York-Poquoson Department of Social Services</p>

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	<p>further explains that a court of record provides accountability and helps ensure the protection of due process rights. Having a court of record would enhance transparency and formality.</p> <p>Additionally, the York-Poquoson Department of Social Services supports a comprehensive study of the entire appeal process, but sees this recommendation as a positive first step.</p> <p>NewFound Families supports this recommendation stating that they often hear from families about the long appeal process and its impact on a child’s sense of stability and permanence.</p> <p>IN OPPOSITION</p> <p>Donna Sayegh opposes this recommendation.</p>
<p>Finding 4 – Foster care-to-adoption is vital in promoting the goal of permanency.</p>	<p>1. Support a messaging campaign at the Virginia Department of Social Services that promotes adoption through foster care.</p> <p><u>PUBLIC COMMENTS</u></p> <p>IN SUPPORT</p> <p>C2Adopt supports any messaging campaign that encourages qualified people to come forward and serve as foster, resource or adoptive parents. C2Adopt also adds that it is important not to forget and to recruit parents who just want to adopt without first providing foster care.</p> <p>NewFound Families supports this recommendation.</p> <p>An adoptive parent supports this recommendation and adds that a messaging campaign should include a focus on foster parents as well because it is important to maintain a viable pool of foster parents.</p> <p>IN OPPOSITION</p> <p>Donna Sayegh opposes this recommendation.</p>

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<p>Finding 5 – Barriers during the adoption placement timeframe include the home study approval process and matching families with youth.</p>	<p>1. Request the Virginia Department of Social Services to investigate the feasibility of implementing a reciprocity process for sharing home studies that will allow local departments of social services and licensed child placing agencies to give access to completed home studies to applicant families and encourage acceptance amongst agencies. The Virginia Department of Social Services shall report findings and recommendations to the Commission on Youth prior to the 2018 General Assembly Session.</p> <p><u>PUBLIC COMMENTS</u></p> <p>IN SUPPORT</p> <p>C2Adopt “would support and participate in any study or review that considers the feasibility of implementing a reciprocity process for sharing home studies.”</p> <p>NewFound Families supports this recommendation and believes that it will benefit the adoption process if reciprocity and access by parents to the home study is pursued as recommendation. NewFound Families believes that families wanting to open up their hearts should not be required to pay for a costly home study in order to provide support and permanency to a child.</p> <p>Additionally, NewFound Families adds that “payment for a home study by a family removes at least the appearance of objectivity for the agency conducting the paid home study.”</p> <p>IN OPPOSITION</p> <p>HopeTree Family Services opposes this recommendation. HopeTree explains that a home study is a relational process and goes deeper than the assessment document. An agency gets to know a family on an intimate level in order to appropriately match a child.</p> <p>Additionally, HopeTree is concerned about the cost implications. HopeTree states that, for treatment foster care, agencies absorb the entire cost of the home study, and they invest resources with the understanding that they will recuperate the cost when the family accepts a child for</p>

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	<p>placement. As a result, if reciprocity is implemented, then treatment foster agencies would need to require payment from potential families for home studies and this would depress the pool of available families.</p> <p>Ronnie Gehring, MSW, Embrace Treatment Foster Care, and Virginia Association of Licensed Child Placing Agencies (VALCPA) at-large board member opposes this recommendation. Mr. Gehring expresses a concern that reciprocity without funding would be a financial burden to agencies. Mr. Gehring also adds that reciprocity would open the door to public agencies recruiting from licensed child placing agencies.</p> <p>Virginia Coalition of Private Provider Associations (VCOPPA) expresses concern about this recommendation. VCOPPA states that reciprocity would cause financial burden for agencies and could result in some agencies being forced out of business. VCOPPA adds that “if reciprocity is to be considered, options and recommendations for funding need to be studied identified.” Abigail Schreiner, MSW, HopeTree Family Services expresses the same concern as VCOPPA.</p> <p>Nancy Strang, LCSW, People Places, Inc. opposes this recommendation indicating that the only way treatment foster care agencies significant investment is recouped is through placements.</p> <p>The Virginia Chapter of the Family Focused Treatment Association (FFTA) expresses concern about this recommendation citing recouping of costs as a concern. According to their estimates, each home study costs a minimum of \$1500 each. FFTA states that “unless the state reimburses agencies a fair wage for each and every home study, each home study should remain proprietary.” The Up Center also agrees with these comments.</p> <p>The Virginia Association of Licensed Child Placing Agencies (VALCPA) expresses concern about this recommendation stating that reciprocity would create an undue financial burden to licensed child placing agencies.</p> <p>VALCPA also adds that some licensed child placing agencies may not feel comfortable accepting an approval or a home study from another agency</p>

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	<p>and may still desire for the potential provider to complete an additional home study.</p> <p>Donna Sayegh opposes this recommendation.</p>
<p>Finding 6 – Adoption savings funds are being used to assist local departments of social services in completing the foster care and adoption home study process.</p>	<p>1. Support the Virginia Department of Social Services efforts related to the hiring of regional home study specialists whose role is to assist local departments of social services by completing the foster care and adoption home study process.</p> <p><u>PUBLIC COMMENTS</u></p> <p>IN SUPPORT</p> <p>C2Adopt supports efforts to increase qualified and trained staff to complete foster care and adoption home study assessments in a timely manner. C2Adopt also inquires about who will do the work with the assessed individual or family post study.</p> <p>NewFound Families supports this recommendation.</p> <p>IN OPPOSITION</p> <p>Donna Sayegh opposes this recommendation and suggests less reliance on funding from the Federal Government.</p>
	<p><u>ADDITIONAL PUBLIC COMMENTS RECEIVED</u></p> <p>NewFound Families requests to include a recommendation that the Virginia Department of Social Services provide written guidance to workers on the protocol for determining paternity. NewFound families states that “workers need guidance on how long to pursue potential fathers when no name is yielding a positive match and the putative father registry is, also, not yielding a match.”</p> <p>The Virginia Catholic Conference made additional comments on training of prospective foster, adoptive, and resource families. The Virginia Catholic Conference requests more flexibility in the training requirement for licensed child placing agencies doing home studies for families that are adopting infants, relatives and children from other countries. The Virginia Catholic Conference goes on to explain that many of the training core</p>

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	<p>competencies required by regulation are not relevant to different types of families and the current requirements drive up the costs to families.</p> <p>Additionally, the Virginia Catholic Conference states the importance of allowing flexibility in agencies choosing a training model. Some models have trauma-informed education components while others do not.</p> <p>The Virginia Catholic Conference requests to include a recommendation to change the law on auditing of child welfare agencies. Currently, each location where adoption services are provided is to be audited every six months. The Virginia Catholic Conference requests this be changed to require each agency providing services, instead of location, to be audited every six months. The current regulations “result in a duplicative and an inefficient use of resources, as it can involve audits every other month in some cases. A change to Virginia law in this regard would maintain a high standard of a site visit every six months and help adoption agencies use their resources more effectively.”</p>