



# Ohio Case Law & Legislative Update 2020

ADOPTION & CHILD WELFARE CASES FROM 9/1/19 – 8/31/20

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SENIOR ATTORNEYS

FAMILY & YOUTH LAW CENTER AT CAPITAL UNIVERSITY LAW SCHOOL

# FYLaw: Who We Are

The Family & Youth Law Center (FYLAW) at Capital University Law School works within child welfare, adoption, and juvenile justice systems to support positive outcomes for children, youth, and families.



# What We Do

- ▶ FYLaw's primary goal is to lead legal, educational, policy, and practice-based reform so that children involved with child protection and juvenile justice systems can live successful lives in safe and healthy homes.
- ▶ We provide leadership, knowledge, education and advocacy to:
  - ▶ practicing professionals who impact the well-being of children and families involved with child welfare and juvenile justice systems,
  - ▶ students preparing for careers in those systems,
  - ▶ policy-makers who impact those systems, and
  - ▶ families, children and youth who are served by those systems.



# Family and Youth Advocacy Center

- Legal services and counseling for transitioning youth and at-risk families
- Education/resources for clients
- Education/resources for professionals and families.
- Key areas of representation:
  - **Public Benefits**
  - **Housing**
  - **Records Expungement (Juvenile and Adult)**
  - **Credit Checks/Identity Theft**
  - **Small Claims**





# CHILD WELFARE CASE UPDATE

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# *In re N.M.P.*, Supreme Court of Ohio, 2020-Ohio-1458

- ▶ Decided April 16, 2020. Cert accepted due to certified conflict between the Eleventh and Sixth appellate districts.
- ▶ N.M.P. was placed into shelter care following a hearing on March 12, 2015. On April 24, 2015, N.M.P. was determined to be a dependent child and was placed in the temporary custody of the agency. Two six-month temporary-custody extensions were granted because the mother was in substantial compliance with the case plan. On March 14, 2017, N.M.P. was returned to the mother and that case was terminated.
- ▶ Approximately two months later, on May 17, 2017, mother returned N.M.P. to his previous foster parents and self-reported her inability to care for him. On June 22, 2017, N.M.P. was again found to be a dependent child and the agency was given temporary custody. By May 2018, the agency reported that neither the mother nor the father had made progress toward reunifying with N.M.P. On June 5, 2018, the agency filed a motion for permanent custody of N.M.P. and on July 25, 2018, the court placed the children in the permanent custody of the agency.

# *In re N.M.P.*, Supreme Court of Ohio, 2020-Ohio-1458

- ▶ Court issued “advisory opinion” that R.C. 2151.414(B)(1)(d), the “12 of 22” rule allowing agency to seek permanent custody does not require 22 consecutive months of agency involvement, it only requires that the child was in the agency’s custody for 12 of 22 consecutive months prior to seeking permanent custody.
- ▶ Thus, in a situation where the custody of the agency is interrupted, as long as the amount of time totals 12 months in the 22 consecutive month time period, the statutory requirement permitting the agency to seek permanent custody is satisfied.
- ▶ Dissent raised issue that this case was not appropriate to decide because its decision would not affect the outcome of the appellate case (agreeing with the agency that it was inappropriate to issue an “advisory opinion,” but did not dispute the majority’s interpretation.

# *In re K.M.*, Supreme Court of Ohio, 2020-Ohio-995

- ▶ County children services board filed complaints alleging that children of two different mothers were abused, neglected, or dependent. Trial court denied mothers' motions to dismiss complaints based on failure to conduct dispositional hearing within 90 days after filing of complaints. Mothers appealed.
- ▶ The Court of Appeals affirmed the trial court; Mothers filed discretionary appeals, which the Supreme Court accepted and consolidated into one appeal.
- ▶ Supreme Court held that R.C. 2151.35(B)(1), which requires dispositional hearing within 90 days of filing of complaint imposed mandatory statutory deadline, not directory deadline, and cases must be dismissed without prejudice.

# Adjudication Cases

- ▶ Most appellate reversals this year have to do with trial court not making the requisite findings of dependency in its decisions.
- ▶ Primary issue is lack of finding of danger, reasonable risk of harm
- ▶ **[In re M.R.](#), Court of Appeals of Ohio, First District, Hamilton County. July 08, 2020 Slip Copy 2020 WL 3815684**
  - ▶ Mother appealed trial court's decision adjudicating her children dependent. Appellate court reversed and remanded the decision as to four of the five children, pointing out that the conduct of a parent is relevant only insofar as that parent's conduct forms a part of the environment of the child at issue and that impact must be specifically demonstrated in a clear and convincing manner.
  - ▶ The appellate court found that the agency presented no evidence demonstrating how Mother's incidences of violence at her ex's home were harmful to the children.
  - ▶ The medical records provided support for establishing the dependency of B.H., they did not provide clear and convincing evidence to establish the dependency of the other children. The magistrate and the juvenile court improperly relied upon hearsay portions of the medical records that had been excluded by the magistrate to make a dependency finding. This hearsay evidence was the only evidence the juvenile court relied upon to find that the other children were in an environment that warranted state intervention.

# Standard of Review

- ▶ **In re A.C., Court of Appeals of Ohio, Eighth District, Cuyahoga County. November 21, 2019 Slip Copy 2019 WL 6247746**
  - ▶ In a case of first impression, appellate court determined that standard of review for request to remove social worker from case is abuse of discretion.
  - ▶ In this case, Father claimed caseworker should be removed because he alleged the caseworker's grandmothers had a personal relationship with Mother's family and that Father and his wife know the caseworker's grandmother. The caseworker testified, however, that both of her grandmothers are deceased; one grandmother died before she was born and the other grandmother died in 2014, long before the minor child at issue in this case was born. Father provided no evidence of any relationship between the families other than his bald accusations. Finding the caseworker's testimony credible and in the absence of any contradictory evidence, the court found no abuse of discretion.

# Best Interest Factors

- ▶ **In re E.B. Court of Appeals of Ohio, First District, Hamilton County. September 27, 2019 Slip Copy 2019 WL 4733116**
  - ▶ Guardian ad Litem appeals Court's decision to award legal custody to maternal second cousin, arguing that Court should have granted permanent custody to the agency; Agency opposed permanent custody, supporting custody to maternal cousin.
  - ▶ Court affirmed, finding 1) court's order was a final appealable order even though a transition period was ordered and no date of legal custody to begin was specified; 2) GAL has standing to appeal as ensuring a child's best interests are protected affects a substantial right in the custody proceeding; 3) despite conflicts between caseworkers, court's decision was supported by the evidence; 4) GAL could not argue that child was not bonded with cousin when GAL's motion was the cause to prevent that; 5) the court did not base its decision solely on cousin's familial relationship to Mother. Instead, the court viewed cousin's relative status as one, among a myriad of factors, the fact that placement with cousin would not sever Mother's parental rights, and that Mother's other children currently reside with the maternal grandparents (thereby facilitating the growth of sibling relationships).

# Legal Custody

- ▶ **In re A.M., Court of Appeals of Ohio, Ninth District, Summit County. October 16, 2019 Slip Copy 2019 WL 5212589**
  - ▶ Family friends were granted temporary, then legal custody of child due to young mother not being able to properly care for her. Mother initially had visitation “by agreement” but after disputes arose, Mother moved for legal custody and through mediation agreed to dismiss her motion in exchange for significant visitation. One year later, legal custodians moved out of county with the child and Mother again moved for legal custody.
  - ▶ In prior appeal, court found error with the trial court’s requirement that Mother must prove a change in circumstances had occurred, holding that in a private legal custody case, the best-interest-of-the-child standard should be used for any custody modification petition filed by a natural parent and remanded for the court to consider best interests.
  - ▶ Trial court found that it was in child’s best interest to remain with legal custodians. Mother appeals. Court of Appeals found that the trial court erred by failing to consider that appropriate relatives should generally be given priority over nonrelatives in legal custody decision where the child is closely bonded and connected to both, by giving inappropriate weight to the wishes of an eight-year-old over the recommendations of two GALs, and by weighing the child’s adjustment to her current living situation when that was created due to an erroneous prior decision of the court.

# Legal Custody, cont.

- ▶ **IN RE C.D.Y., ET AL., Court of Appeals of Ohio, Eighth District, Cuyahoga County. December 05, 2019 Slip Copy 2019 WL 6606432**
  - ▶ Father was awarded custody of minor children after they were adjudicated neglected in Mother's care. Approximately one year later, Mother filed motion to modify custody to name her the legal custodian, as Father was incarcerated; children were residing with Father's girlfriend, to whom he gave power of attorney. Trial court denied Mother's motion and granted temporary legal custody to Father's girlfriend.
  - ▶ Mother appealed; appellate court reversed and remanded, finding that Father's girlfriend did not file a motion for custody nor did she file a statement of understanding, therefore could not be awarded legal custody under R.C. 2151.353(A)(3)(a)–(d) without doing so, and that the court failed in considering all of the best interest factors.

# Permanent Custody

- ▶ **IN RE: L.L., Court of Appeals of Ohio, Third District, Hancock County. April 20, 2020 Slip Copy 2020 WL 1910506**
  - ▶ Appellate court upheld decision of trial court finding that factors necessary to award permanent custody were satisfied because mother had abandoned the child and the best interests of the child were served by an award of permanent custody.
  - ▶ The majority agreed with the trial court that the findings of two periods of abandonment for more than 90 days, one due to hospitalization for drug abuse and the other due to imprisonment were voluntary actions of abandonment by mother.
  - ▶ However, the concurrence found that, while the abandonment due to violating the law was a voluntary action by mother and therefore supported the result, the finding that mother's hospitalization was voluntary was error and should not have been a basis for determining she had abandoned the child. The concurrence's reasoning was that time being treated for an illness, regardless of what caused the illness, should not be counted as part of an abandonment calculation. Public policy would encourage one, especially a parent, to seek whatever medical treatment they require without concern that it would be used against them in a court proceeding to terminate parental rights.

# Permanent Custody, cont.

- ▶ ***In re D.M.*, Court of Appeals of Ohio, First District, Hamilton County. June 10, 2020 Slip Copy 2020 WL 3076569**
  - ▶ Mother and Father were both minors at the time of the birth of all three of their children; the children were adjudicated dependent and agency was awarded temporary custody due to Mother and Father's inability to care for the children themselves. According to the case plan, Mother was to demonstrate appropriate parenting skills and knowledge to meet the children's developmental and medical needs, demonstrate substance sobriety, mental health stability and compliance, appropriate parenting skills and knowledge.
  - ▶ Appellate court reversed and remanded decision of trial court granting permanent custody of children to the agency, finding that the evidence did not support the conclusion that Mother did not complete her case plan. The trial court abused its discretion in finding that the children did not have a legally secure permanent placement with Mother, because the agency did not investigate the placement and prove that it was insufficient, even though it had the burden of proof to do so. In addition, reliance on the fact that the children were bonded with their foster parents in a best interest determination because the case had dragged on for four years through no fault of Mother was inappropriate.

# Reasonable Efforts by Agency

- ▶ **In re H.S., Court of Appeals of Ohio, Ninth District, Summit County. October 23, 2019 Slip Copy 2019 WL 5430317**
  - ▶ Permanent custody to agency granted; father appealed. Judgment reversed and remanded, finding that CSB had not made reasonable reunification efforts. Hands-on parenting education incorporating the children, which was deemed necessary by the juvenile court to accommodate the needs of the parents with cognitive delays, still had not occurred.
  - ▶ Although the juvenile court is precluded from ordering an extension of temporary custody beyond two years after the complaint was filed, the trial court retains continuing jurisdiction upon remand by operation of law. Agency operated under incorrect assumption that upon reversal and remand after children have been the subjects of a dependency action for more than two years, the juvenile court retains jurisdiction only for an additional six-month period and ceased providing reasonable access to services.
  - ▶ Upon remand, CSB's self-imposed artificial six-month deadline defeated the purpose of any reunification efforts. By prematurely filing its motion for permanent custody, knowing that in-home visits must then stop, the agency created an artificial barrier to reunification that it could not overcome.

# Reasonable Efforts by Agency, cont.

- ▶ **In re J.H., Court of Appeals of Ohio, Ninth District, Lorain County. November 04, 2019 Slip Copy 2019 WL 5696170**
  - ▶ Agency's attempts to locate Father were insufficient where their inquiry was limited to asking Mother and Paternal Grandmother if they knew where he was. It is reasonable to expect that, at a minimum, Agency conduct a computer search to determine Father's whereabouts.
  - ▶ In addition, once Agency found Father fourteen months into the case, they were required to include Father on the case plan, to provide an opportunity to participate in the case planning process and to attempt to obtain an agreement among all parties, including Father, regarding the content of the case plan. If an agreement could not be reached, Father also should have been given the opportunity to present evidence at the dispositional hearing to determine the contents of the case plan to be adopted by the court. The Agency's failure to do the above as well as the trial court's failure to transport Father to the hearing were reversible errors.

# Due Process – Opportunity to be Heard

- ▶ **In re E.J., Court of Appeals of Ohio, Twelfth District, Warren County. August 10, 2020 Slip Copy 2020 WL 4577184**
  - ▶ Child, age 14, appealed from trial court's decision awarding permanent custody to the agency, claiming court violated her due process rights in refusing to allow her to attend the permanent custody hearing to assist her attorney in opposing permanent custody.
  - ▶ Appellate court affirmed trial court's decision to exclude her from the hearing as permitted pursuant to R.C. 2151.35(A)(1), and found no abuse of discretion in doing so, as there was valid concern for the stability of the child's mental health in having her listen to testimony discussing her parents' shortcomings and this concern was the underlying reason for the dependency case. Further, the child was afforded the opportunity to be heard via *in camera* interview, the decision on permanent custody reflects that the court carefully considered her wishes, which were adequately represented by appointed counsel, who elicited testimony concerning the child's wishes and provided a closing argument reiterating the child's position against permanent custody.

# Civil Procedure

- ▶ **In re K.V., Court of Appeals of Ohio, Eighth District, Cuyahoga County. December 12, 2019 Slip Copy 2019 WL 6769766; In re A.C., Court of Appeals of Ohio, Eighth District, Cuyahoga County. December 12, 2019 Slip Copy 2019 WL 6769767**
  - ▶ Two cases, decided the same day, where trial court approved and adopted Magistrate's Decision even though objections were timely filed and transcript was requested, but had not yet been filed for court's review.
  - ▶ Appellate court found that trial court's failure to conduct independent review of transcript pursuant to Juv.R. 40(D)(4)(d) upon timely objections was reversible error. Both contained claims that court used "CourtSmart" technology that allowed court to review the testimony at the hearing electronically, but in both cases, that was not deemed sufficient.
  - ▶ In second case, appellate court did note that there was language in Rule 40 that states that "[w]ith leave of court, alternative technology or manner of reviewing the relevant evidence may be considered," there was nothing in the record to indicate that such leave was given, and it was also significant that the court granted appellant's motion to order the transcript, but ruled before the time period permitted for the transcript to be filed.

# Standing

- ▶ ***In re A.G.*, Court of Appeals of Ohio, Sixth District, Lucas County. May 01, 2020 Slip Copy 2020 WL 2096396**
  - ▶ Mother's parental rights were terminated in 2014 and permanent custody was awarded to the agency. Legal custody was thereafter given to Mother's ex-husband, who also had custody of Mother's two children with him. Mother has unsupervised companionship with the other two children.
  - ▶ In 2019, Mother filed a third-party complaint against her ex-husband, requesting companionship or custody with A.G. Thereafter, she amended her complaint for custody and companionship to allege neglect and dependency and added the agency as a party, alleging that LCCS has neglected its responsibilities to A.G, that her ex-husband has neglected A.G. and failed to provide for her basic needs, and that it is not in A.G.'s best interest to observe her half-siblings maintain a relationship with their mother while A.G. is not permitted the same privilege. Mother's amended complaint omits any request that she be awarded custody of A.G., however, she again requests visitation and companionship.
  - ▶ Trial court dismissed Mother's complaint, finding that she lacked standing to seek custody or parenting time because her parental rights were terminated. Mother appealed. Appellate court affirmed in part, and reversed in part, finding that R.C. 2151.27(A)(1) and the first paragraph of Juv.R. 10(A) grant standing to "any person" to file a complaint for dependency or neglect, therefore Mother had standing to file the amended complaint alleging A.G. was neglected even though her parental rights had been terminated. However, the trial court correctly determined that Mother lacked standing to seek relief in the form of visitation and companionship because such residual parental rights were terminated when permanent custody was awarded to the agency.

# Anders Cases

- ▶ IN THE MATTER OF: D. M. ADJUDGED NEGLECTED/ DEPENDENT CHILD, Court of Appeals of Ohio, Fifth District, Tuscarawas County. February 03, 2020 Slip Copy 2020 WL 549236, IN THE MATTER OF: D. M. ADJUDGED NEGLECTED/ DEPENDENT CHILD, Court of Appeals of Ohio, Fifth District, Tuscarawas County. February 03, 2020 Slip Copy 2020 WL 550196, IN THE MATTER OF: K. M. ADJUDGED NEGLECTED/ DEPENDENT CHILD, Court of Appeals of Ohio, Fifth District, Tuscarawas County. February 03, 2020 Slip Copy 2020 WL 550199, IN THE MATTER OF: A. M. ADJUDGED NEGLECTED/ DEPENDENT CHILD, Court of Appeals of Ohio, Fifth District, Tuscarawas County. February 03, 2020 Slip Copy 2020 WL 549458, IN THE MATTER OF: D. M., JR. ADJUDGED NEGLECTED/ DEPENDENT CHILD, Court of Appeals of Ohio, Fifth District, Tuscarawas County. February 03, 2020 Slip Copy 2020 WL 549453, IN THE MATTER OF: K. M. ADJUDGED NEGLECTED/ DEPENDENT CHILD, Court of Appeals of Ohio, Fifth District, Tuscarawas County. February 03, 2020 Slip Copy 2020 WL 549347, IN THE MATTER OF: K. M. ADJUDGED NEGLECTED/ DEPENDENT CHILD, Court of Appeals of Ohio, Fifth District, Tuscarawas County. February 03, 2020 Slip Copy 2020 WL 549353
- ▶ Mother has seven children; all seven were adjudicated neglected and dependent. CPS filed motions requesting permanent custody of three of the children, and legal custody to kinship for four of the children, all of which were granted by the trial court. An appeal was filed as to each child. Mother's attorney filed a conditional motion to withdraw and a brief pursuant to *Anders v. California*, in each case, asserting that the within appeal "has no merit." Court granted motions and found mother's claim to have no merit in each case. Importantly, Fifth District announced that, after the ruling in these seven cases, it would no longer consider *Anders* motions for PCC or legal custody cases, following the trend set by the Sixth and Second districts.

# Final Appealable Orders

- ▶ ***In re C.J.*, Court of Appeals of Ohio, Sixth District, Lucas County. September 20, 2019 Slip Copy 2019 WL 4566927**
  - ▶ Per *In re Murray*, 52 Ohio St.3d 155, 556 N.E.2d 1169 (1990), an adjudication without a disposition is not a final appealable order.
  - ▶ The trial court in this case did not hold a separate dispositional hearing or place the child in any of the custody arrangements found in R.C. 2151.353(A) following the adjudicatory hearing or any other time prior to father filing his notice of appeal. Although the juvenile court placed the child in the temporary custody of LCCS the day that the complaint was filed, this was not a “disposition” because it did not occur after an adjudicatory hearing.

# Immunity

- ▶ **MATERNAL GRANDMOTHER v. HAMILTON COUNTY DEPARTMENT OF JOB AND FAMILY SERVICES**, Court of Appeals of Ohio, First District, Hamilton County. April 22, 2020 Slip Copy 2020 WL 1983759
  - ▶ Grandmother, as administrator of grandchild's estate, sued county, county commissioners, children's services agency and caseworkers for the wrongful death of her grandchild at the hands of her parents. County, commissioners, agency and caseworkers moved for judgment on the pleadings based upon sovereign immunity under R.C. 2744. Trial court determined that sovereign immunity applies and granted judgment on the pleadings as to all claims except those against the parents. Grandmother appealed.
  - ▶ Court of appeals affirmed, finding sovereign immunity applied, as engaging in protection of children is a governmental function, none of the exceptions applied, and employees did not act outside of their scope of employment, there was no breach of duty, and they did not act wantonly, recklessly, in bad faith, or with malicious purpose. The majority stated fault lies solely on the parents.
  - ▶ Dissent disagreed, finding that the appellants did allege sufficient facts which, if proven, could plausibly establish an exception to the individual caseworkers' immunity for acting wantonly and recklessly, based upon hospital's report of abuse and neglect to the agency employees; the employees' alleged failure to investigate; the permitted return to the home of mother and father; the potentially deficient home visit, and the coroner's finding that the cause of death was "Battered Child Syndrome with Acute and Chronic Intracranial Hemorrhages and Starvation" with an onset of months.



# ADOPTION CASE LAW UPDATE

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# C.H. v. O'Malley, 158 Ohio St.3d 107, 2019-Ohio-4382

- ▶ Supreme Court of Ohio; decided October 29, 2019.
- ▶ C.H., seeks a writ of prohibition to bar respondents, Cuyahoga County Juvenile Court Judge Jennifer L. O'Malley and her designated magistrate, from exercising jurisdiction over a case involving the custody of E.J.H., C.H.'s biological grandchild.
- ▶ February 13, 2019: the Supreme Court of Ohio denied a motion for judgment on the pleadings and granted an alternative writ.
- ▶ Upon consideration of the merits of C.H.'s arguments, the Supreme Court denies the alternative writ.

# C.H. v. O'Malley, 158 Ohio St.3d 107, 2019-Ohio-4382

- ▶ Three elements are necessary for a writ of prohibition to issue:
  - ▶ (1) the exercise of judicial power,
  - ▶ (2) the lack of authority for the exercise of that power, and
  - ▶ (3) the lack of an adequate remedy in the ordinary course of the law.
    - ▶ If the absence of jurisdiction is patent and unambiguous, it is not necessary to establish this prong.

# *C.H. v. O'Malley*, 158 Ohio St.3d 107, 2019-Ohio-4382

- ▶ Here, the SCO denies the writ of prohibition.
  - ▶ Ohio was E.J.H.'s home state as of September 6, 2018, when Osley filed the pending custody application.
  - ▶ Judge O'Malley and her designated magistrate have jurisdiction over that pending action under R.C. 3127.15(A).
  - ▶ Given this analysis, it is unnecessary to consider Judge O'Malley's alternative argument: that she and her designated magistrate have temporary emergency jurisdiction under R.C. 3127.15.
- ▶ Dissent

# *In re Adoption of A.C.B.*, 159 Ohio St.3d 256, 2020-Ohio-629

- ▶ Supreme Court of Ohio; decided February 26, 2020.
- ▶ Issue: R.C. 3107.07(A), Whether a noncustodial parent has provided the financial support necessary to preserve his or her right to withhold consent to the adoption of his or her child is measured by the terms of the judicial decree.
- ▶ Appellant-father failed without justifiable cause to comply with the child-support obligations of the judicial decree for the one-year period preceding the filing of appellee-stepfather's adoption petition.
- ▶ Supreme Court affirms Court of appeals' judgment affirming probate court's judgment.

# *In re Adoption of A.C.B.*, 159 Ohio St.3d 256, 2020-Ohio-629

## **3107.07 Consent unnecessary.**

Consent to adoption is not required of any of the following:

(A) A parent of a minor, when it is alleged in the adoption petition and the court, after proper service of notice and hearing, finds by clear and convincing evidence that the parent has failed without justifiable cause to provide more than *de minimis* contact with the minor or to provide for the maintenance and support of the minor as required by law or judicial decree for a period of at least one year immediately preceding either the filing of the adoption petition or the placement of the minor in the home of the petitioner.

# *In re Adoption of A.C.B.*, 159 Ohio St.3d 256, 2020-Ohio-629

- ▶ Here, application of the statute is straightforward.
  - ▶ The Indiana court order required father to pay support of \$85 per week, a total of \$4,420 over the course of a year. Father paid only \$200 in the relevant one-year period.
  - ▶ Thus, he did not provide maintenance and support as required by law or judicial decree.
  - ▶ Further, the probate court found that he lacked justifiable cause for not complying with the decree, and he did not challenge that finding below.
  - ▶ Therefore, father's consent is not required for the adoption of A.C.B.
- ▶ In making a single \$200 payment toward a \$4,420 annual child support obligation, father failed to provide maintenance and support as required by law or judicial decree.
- ▶ Dissents



# LEGISLATIVE UPDATE

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# H.B. 8: Regards Foster Caregiver Training

- ▶ History
  - ▶ 9/2/2020: Passed by Senate
  - ▶ 9/2/2020: Bills for Third Consideration
  - ▶ 9/1/2020: Fourth Hearing
  - ▶ 9/18/2019: First Hearing
  - ▶ 7/17/2019: Referred to Senate Committee on Health, Human Services and Medicaid
  - ▶ 6/6/2019: Passed by House
- ▶ Sponsors: Rep. Manchester, Rep. Galonski
- ▶ Summary: Removes statutory and training requirements for foster caregivers in favor of ODJFS rules; allows for twenty percent of pre-placement training for foster caregivers to be completed online.

# H.B. 188: Prohibit blindness from denying or limiting care of minor

- ▶ History:
  - ▶ 1/21/2020: Fifth Hearing
  - ▶ 1/14/2020: Fourth Hearing
  - ▶ 11/12/2019: Third Hearing
  - ▶ 4/10/2020: Referred to House Health Committee
  - ▶ 4/9/19: Introduced in House
- ▶ Sponsors: Rep. Crawley, Rep. Cross
- ▶ Summary: To generally prohibit a person's disability from being used to deny or limit custody, parenting time, visitation, adoption, or service as a guardian or foster caregiver, regarding a minor.

# H.B. 405: Create adoption linked deposit program

- ▶ History:
  - ▶ 9/1/2020: Referred to Senate Health, Human Services and Medicaid Committee
  - ▶ 5/15/2020: Introduced in Senate
  - ▶ 5/13/2020: Passed by House
  - ▶ 11/18/2020: Referred to House State and Local Government Committee
  - ▶ 11/12/2019: Introduced to House
- ▶ Sponsor: Rep. Cross
- ▶ Summary: Establishes the Adoption Linked Deposit Program to provide lower-cost loans to individuals who are adopting a child to pay for adoption expenses.

# S.B. 225: Post child abuse reporting phone number in public schools

- ▶ History:
  - ▶ 1/21/2020: First Hearing
  - ▶ 10/23/2019: Referred to Senate Government Oversight and Reform Committee
  - ▶ 10/16/2019: Introduced in Senate
- ▶ Sponsor: Senator Lehner
- ▶ Summary: Would require public schools to post signs with a child abuse reporting telephone number.

# H.B. 506: Prohibit placement of child with relative child does not know

- ▶ History:
  - ▶ 2/26/2020: First hearing
  - ▶ 2/19/2020: Referred to House Committee on Civil Justice
  - ▶ 2/13/2020: Introduced into House
- ▶ Sponsor: Rep. Manning
- ▶ Summary: Prohibits placement of the child with a relative the child does not know or has never met unless determined to be in a child's best interest.

# H.B. 555: Change child support laws with regard to caretakers

- ▶ History:
  - ▶ 6/10/2020: First hearing
  - ▶ 5/5/2020: Referred to House Committee on Civil Justice
  - ▶ 3/16/2020: Introduced into House
- ▶ Sponsors: Rep. Russo, Rep. Manchester
- ▶ Summary: To make changes to child support laws with regard to caretakers.

# Questions?

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