

## DEPARTMENT OF SOCIAL SERVICES

## CHILDREN'S DIVISION

P. O. BOX 88

JEFFERSON CITY, MISSOURI

November 6, 2009

## M E M O R A N D U M

<p><b><u>What's Inside:</u></b>  Concurrent  Permanency  Planning</p>
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TO: REGIONAL EXECUTIVE STAFF, CIRCUIT MANAGERS, AND  
CHILDREN'S DIVISION STAFF

FROM: PAULA NEESE, DIRECTOR

SUBJECT: CONCURRENT PERMANENCY PLANNING

## DISCUSSION:

The purpose of this memorandum is to introduce changes to the concept of Concurrent Permanency Planning. The changes come as a result of an identified need to improve practice and provide clarification. Concurrent Permanency Planning refers to pursuing a primary goal of reunification while at the same time establishing and implementing an alternate plan to establish a permanent plan for the child. Concurrent Permanency Planning is a helpful tool to expedite permanency and reduce the number of placement changes children experience in alternative care. This memorandum discusses the changes which may impact practice:

**Reunification as a Primary Plan**

This memorandum and manual revision clarifies the use of reunification as a permanency plan. Reunification with a caretaker or custodial parent from which the child was removed, or reunification with the non-custodial parent are all considered reunification plans. **A case plan of reunification should always be a primary permanency plan, not a concurrent permanency plan.** If the possibility exists to reunify with either parent or a principal caretaker from whom the child was removed, the primary permanency plan would be reunification.

Example 1: If a child is removed from his mother while his father is in jail, but his father will be getting out of jail soon, the primary permanency plan will be reunification with mother **or** father. In this scenario, if the child reunifies with dad, the close reason should be "goal achieved". Selecting "other" and stating living with relatives in the explanation would not be a suitable close reason for this example.

Example 2: If a child is removed from his grandmother and the plan is to reunify with the grandmother **or** the mother **or** the father, the primary permanency plan would be reunification. The concurrent plan would not be reunification with the mother or father. The concurrent plan could be adoption or guardianship with another relative.

A primary plan and a concurrent plan should not be the same. A system change has been completed to disallow a concurrent plan if the same plan was selected as the primary plan. A system change request was submitted to allow users to enter up to three people for each plan. This FACES system change is forthcoming. In the meantime, staff should be sure to clearly document the plan, including the reunification resources on the Child Assessment and Service Plan, CS-1.

**Legal Considerations**

Staff should also keep in mind the legal considerations affecting the decision making process. Any decision made should include the ability to implement the plan. For example, in order to implement a plan of guardianship, there must be documentation to show that the parent is unfit, unwilling, and unable to provide for the child. Parents are entitled to due process of the law and CD should not interfere with the parent/child relationship without providing the right to due process. It is imperative that staff provide full disclosure to the parents of problems, changes, consequences, timelines, and concurrent permanency decision making. Full disclosure can help expedite permanency for the child.

**When to Use Concurrent Planning**

Concurrent Permanency Planning should begin within 24 to 72 hours of a child’s removal from the home and should be discussed at every family support team meeting as long as a concurrent permanency plan is required. Concurrent Permanency Planning is required any time the primary plan is reunification and is optional for the primary plans of adoption, guardianship, placement with a fit and willing relative, and APPLA. [Section 4 Chapter 9.8](#) of the Child Welfare Manual provides examples of activities that should be completed simultaneously for both the primary plan and the concurrent plan. This memorandum also introduces the Concurrent Planning Checklist, CD-139, and the Case File Documentation Checklist, CD-142, which are optional tools which have been developed to help staff understand concurrent permanency planning and document reasonable efforts towards the concurrent permanency plan.

Online training to support the new policy is forthcoming. These provisions will be effective as of today’s date. [Section 4 Chapter 9.8](#) has been modified to reflect the changes outlined in this memorandum.

<b>NECESSARY ACTION</b>	
<ol style="list-style-type: none"> <li>1. Review this memorandum with all Children’s Division staff.</li> <li>2. Review revised Child Welfare Manual chapters as indicated below.</li> <li>3. All questions should be cleared through normal supervisory channels and directed to:</li> </ol>	
<b>PDS CONTACT</b>	<b>PROGRAM MANAGER</b>
Christy Collins (573) 751-9603 <a href="mailto:Christy.Collins@dss.mo.gov">Christy.Collins@dss.mo.gov</a>	Melody Yancey (573) 751-3171 <a href="mailto:Melody.Yancey@dss.mo.gov">Melody.Yancey@dss.mo.gov</a>

<p><b>CHILD WELFARE MANUAL REVISIONS</b></p> <p>Section 4 Chapter 9.8 <a href="#">Concurrent Planning</a></p> <p>Section 4 Chapter 9.8.1 <a href="#">Goals of Concurrent Permanency Planning</a></p> <p>Section 4 Chapter 9.8.2 <a href="#">When Concurrent Planning is Used</a></p> <p>Section 4 Chapter 9.8.3 <a href="#">Components of Effective Concurrent Planning</a></p> <p>Section 4 Chapter 9.8.4 <a href="#">Documenting Concurrent Planning</a></p> <p>Section 4 Chapter 9.8.5 <a href="#">Family Involvement in Concurrent Planning</a></p> <p>Section 4 Chapter 9.8.6 <a href="#">Legal Strategies</a></p> <p>Section 4 Chapter 9.8.7 <a href="#">Changing the Permanency Plan and Case Activities</a></p> <p>Section 4 Chapter 9.7 <a href="#">Adoption and Safe Families Act of 1997</a></p> <p>Section 4 Chapter 9.7.1 <a href="#">Legal Mandates</a></p> <p>Section 4 Chapter 9.7.2 <a href="#">Timeframes to Review Permanency Plans for Children in Out-of-Home Care</a></p> <p>Section 4 Chapter 9.7.3 <a href="#">Criteria for Compelling Reasons Determination for Not Filing TPR</a></p> <p>Section 4 Chapter 9.7.4 <a href="#">Process for Compelling Reasons for Not Filing TPR Determination</a></p>
<p><b>FORMS AND INSTRUCTIONS</b></p> <p>CD-139 <a href="#">Concurrent Planning Checklist</a></p> <p>CD-142 <a href="#">Case File Documentation Checklist</a></p>
<p><b>REFERENCE DOCUMENTS AND RESOURCES</b></p> <p>N/A</p>
<p><b>RELATED STATUTE</b></p> <p>N/A</p>
<p><b>ADMINISTRATIVE RULE</b></p> <p>N/A</p>
<p><b>COUNCIL ON ACCREDITATION (COA) STANDARDS</b></p> <p><a href="#">Council on Accreditation Standard for Concurrent Planning</a></p> <p><a href="#">Council on Accreditation Standard for Concurrent Planning</a></p>
<p><b>CHILD AND FAMILY SERVICES REVIEW (CFSR)</b></p> <p><a href="#">CFSR Instrument, Item 7, Permanency goal for Child</a></p> <p><a href="#">CFSR Instrument, Item 8, Reunification, guardianship or placement with relatives</a></p> <p><a href="#">CFSR Instrument, Item 9, Adoption</a></p> <p><a href="#">CFSR Instrument, Item 10, Other Planned Permanent Living Arrangement</a></p>
<p><b>PROTECTIVE FACTORS</b></p> <p>Parental Resilience-N/A</p> <p>Social Connections-N/A</p> <p>Knowledge of Parenting and Child Development-N/A</p> <p>Concrete Support in Times of Need-N/A</p> <p>Social and Emotional Competence of Children-N/A</p>
<p><b>FACES REQUIREMENTS</b></p> <p>N/A</p>