

**MEMORANDUM**

TO: Michael Lynch, Ohio Department of Job and Family Services

FROM: Sophia Papadimos, Regulatory Policy Assistant

DATE: July 24, 2015

RE: **CSI Review – Adoption Policy/Matching (OAC 5101:2-48-5 and 5101:2-48-16)**

On behalf of Lt. Governor Mary Taylor, and pursuant to the authority granted to the Common Sense Initiative (CSI) Office under Ohio Revised Code (ORC) section 107.54, the CSI Office has reviewed the abovementioned administrative rule package and associated Business Impact Analysis (BIA). This memo represents the CSI Office's comments to the Agency as provided for in ORC 107.54.

Analysis

This rule package consists of two amended rules being proposed by the Ohio Department of Job and Family Services (ODJFS) pursuant to the five-year review requirement in statute. The rule package was submitted to the CSI Office on June 3, 2015 and the comment period was held open through June 10, 2015.

The proposed amendments are in response to an ongoing effort to align the foster care and adoption processes, as well as an effort to remove any inconsistencies in the rules regarding the matching process. Ohio Administrative Code (OAC) 5101:2-48-5 provides guidance to agencies regarding the policies they are required to have, including their adoption recruitment plans. OAC 5101:2-48-16 provides guidance to agencies regarding what is required between the time of permanent custody and the time of adoption.

The adverse impacts described in the BIA include the time and cost associated with documenting assessment activities and developing policies. Amendments to the rule now only require an initial recruitment plan, as opposed to the annual recruitment plan that was previously required. No

comments were received that requirements of the rules are overly burdensome. Therefore, after reviewing the rules and associated BIA, the CSI Office has determined the purpose of the rules is justified.

Recommendation

For the reasons explained above this office does not have any recommendations regarding this rule package.

Conclusion

Based on the above comments, the CSI Office concludes that the Department should proceed with the formal filing of this rule package with the Joint Committee on Agency Rule Review.

cc: Mark Hamlin, Lt. Governor's Office