

**MEMORANDUM**

**TO:** Trudy Rammon, Ohio Department of Job and Family Services

**FROM:** Danielle Dillard, Regulatory Policy Advocate

**DATE:** April 19, 2018

**RE:** **CSI Review – Exit Interviews (OAC 5101:2-42-65.1)**

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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) § 107.54, CSI has reviewed the abovementioned administrative rules and associated Business Impact Analysis (BIA). This memo represents CSI's comments to the Agency as provided for in ORC § 107.54.

**Analysis**

This rule package consists of one amended rule submitted by the Ohio Department of Job and Family Services (ODJFS) as part of the statutorily required five-year rule review. The rule was submitted on March 28, 2018 and the CSI public comment period closed on April 3, 2018. No comments were received during this time.

The proposed amendments are intended to clarify situations when completion of the exit interview is not required. Specifically, Paragraph (B) was modified to update procedure changes with the inclusion of the JFS 01678 Exit Interview in the statewide automated child welfare information system. The rule requires case workers to complete an exit interview with each child within seven days after they leave a foster care placement. The purpose of the interview is to ensure the safety of children in foster care by asking specific questions regarding the child's experience in each foster home.

As part of early stakeholder outreach, the Department conducted a pre-clearance process prior to an additional clearance period and submission of the rules to CSI. One comment was received during the pre-clearance period, stating that exit interviews of children in out-of-home placement for 24 hours or less should not be mandatory. The Department incorporated the suggested change. The rule was also presented to the Public Children Services Association of Ohio rules

committee in order to give members a chance to provide feedback. ODJFS reviewed and revised language in the rules based on concerns from all interested stakeholders. No comments were received during the Department's regular clearance period or the CSI public comment period.

The rules impact all public and private child services agencies in Ohio. Agencies must complete an exit interview with each child after they leave each placement setting, and record the information on the exit interview form. The adverse impact entails time spent completing each interview and completing the required form. The severity of this impact is dependent on the number of placements an agency has, the number of times each child leaves a placement, and the specific amount of time a case worker spends completing the interview form. There are no fines or penalties associated with noncompliance. The Department justifies any adverse impact because the rule ensures child safety, and sets a standard that can be applied consistently and evenly among child services agencies.

### **Recommendations**

For the reasons discussed above, the CSI Office does not have any recommendations for this rule package.

### **Conclusion**

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