



Common Sense Initiative

Mike DeWine, Governor
Jon Husted, Lt. Governor

Carrie Kuruc, Director

MEMORANDUM

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

FROM: Jacob Ritzenthaler, Regulatory Policy Advocate

DATE: July 10, 2020

RE: **CSI Review – Ohio Kinship and Adoption Navigator Program (OAC 5101:2-40-10)**

On behalf of Lt. Governor Jon Husted, 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 one new rule proposed by the Ohio Department of Job and Family Services (ODJFS). This rule package was submitted to the CSI Office on June 22, 2020, and the public comment period was held open through June 29, 2020. Unless otherwise noted below, this recommendation reflects the version of the proposed rule filed with the CSI Office on June 22, 2020.

Ohio Administrative Code 5101:2-40-10 is a proposed new rule that establishes requirements for the Ohio Kinship and Adoption Navigator (OhioKAN) program. The program helps provide resources for kinship and post-adoptive families regarding publicly funded childcare, respite care services, training, and legal services. The OhioKAN program provides services throughout 10 regions of Ohio, each with 10 OhioKAN staff navigators placed among facilities throughout the region.

While developing the standards for the OhioKAN program, ODJFS met with and solicited suggestions from child services agencies, participants in previous ODJFS initiatives involving

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kinship and adoptive families, and current adoptive families and kinship caregivers. ODJFS received three stakeholder comments during early stakeholder outreach. One comment expressed concerns that having access to confidential information through the Statewide Automated Child Welfare Information System (SACWIS) could potentially put program participants at risk. ODJFS responded that a separate module was being built within SACWIS to maintain OhioKAN data, which would prevent access to other child welfare information. One stakeholder suggested a minor language edit, which was accepted and incorporated into the rule, and another offered support for the OhioKAN program. No comments were received during the CSI public comment period.

The business community impacted by this rule includes all businesses selected as sites to house navigators of the OhioKAN program. The adverse impact created by the rule includes the administrative time and effort spend housing an OhioKAN navigator. Funding for the salary of the navigators is provided by ODJFS and is estimated to be approximately \$60,000. ODJFS states that the rule allows kinship caregivers and adoptive families to receive significantly increased access to resources that will prioritize child placement permanency, as well as implementing statutory requirements for the establishment of the OhioKAN program.

Recommendations

Based on the information above, the CSI Office has no recommendations on this rule package.

Conclusion

The CSI Office concludes that the Ohio Department of Job and Family Services should proceed in filing the proposed rules with the Joint Committee on Agency Rule Review.