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Hearing Date: 9/29/2022 Today's Date: 10/6/2022

Agency: Ohio Department of Job and Family Services

Rule Number(s): 5101:2-5-28, 5101:2-5-33, 5101:2-5-38

If no comments at the hearing, please check the box.

List organizations or individuals giving or submitting testimony before, during or after the public hearing and indicate the rule number(s) in question.

1. Kate Rossman, Ohio Childrens Alliance

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Hearing Summary Report

Consolidated Summary of Comments Received

Please review all comments received and complete a consolidated summary paragraph of the comments and indicate the rule number(s).

Kate Rossman with the Ohio Children's Alliance testified on rules 5101:2-5-33 and 5101:2-5-38. She began her testimony by noting her organizations support and appreciation of changes in the rules that would allow for outside of the classroom training to account for up to one-half of continuing training hour requirements for foster parents (as opposed to the current maximum of one-fourth) and also for the increase in stipend reimbursements from the current \$15 an hour to \$20 an hour.

However, Ms. Rossman also expressed concerns about some of the proposed changes in the language of the rules within the package. First, issue was taken with the requirement that foster parents must take training on 11 specified topics, known as "Resource Readiness." Specifically, Ms. Rossman noted the possibility that these 11 specific topics may take up the vast majority of minimally-required foster training hours and limit or eliminate the ability for local agencies to offer different, and perhaps more specific training to foster parents. She also noted that this imbalance may lead to more foster parents opting to not continue their service. As an alternative, she proposed altering the rule to allow foster parents to select 7 courses from the 11 specific topics mentioned in the rule.

Secondly, Ms. Rossman expressed grave concern about the proposed lowering of the foster parent pre-service training allowance ceiling from 36 to 24 hours. Noted in the testimony was that the current ceiling allows agencies to prepare for and foster parents to attend trainings and a reduction in the ceiling would have an adverse impact on training and/or the fiscal budget of local agencies. Ms. Rossman argued that continuing to support agencies in a time of need meets the legislative intent of House Bill 8 (which was the impetus for the rule changes).

Third, Ms. Rossman noted that while the number of hours has been reduced by 12 hours for training, the same number of topics (18) are expected to be covered. This was deemed impractical by Ms. Rossman and a proposal to reduce the topics covered from 18 to 15 offered, with specific training suggested to be eliminated.

In general, Ms. Rossman argued that the rules conflicted with the intent of the 2018 Foster Care Advisory Group and the intent of House Bill 8, as expressed by the primary sponsor.

Hearing Summary Report

Incorporated Comments into Rule(s)

Indicate how comments received during the hearing process were incorporated into the rule(s). If no comments were incorporated, explain why not.

No changes were made as a result of the comments to the rule. As general historical context, ODJFS joined with various stakeholders, including the Ohio Children's Alliance in lengthy discussions and conversations about the rules and proposed changes based on House Bill 8 and the Foster Care Advisory Group work. After receiving input from all partners and stakeholders, the department determined the draft rules are a product of and represent a robust process of discussion and compromise.

Specifically, the department does not believe that the 11 topics that are covered in the "Resource Readiness" training represent a threat to crowd out opportunities for learning and training on other topics in light of the fact that each topic can be completed in a 1-to-2-hour timeframe. Additionally, training is not viewed as a "one-and-done" process and it is an expectation that returning foster parents will continue to learn on a given topic beyond any initial training. The proposed compromise is not preferable to the proposed language, as allowing variance on an agency and individual basis for essential training topics and knowledge creates problems and uniformity issues, undercutting the need to ensure a minimum basis of knowledge for foster parents and minimum standards statewide.

To the concerns around lowering the ceiling on pre-service training, this change would have no impact of other training offered to a foster parent that is not considered "pre-service." It should also be noted that there is no expected decrease in the amount of funds provided to agencies for the purposes of pre-service training, meaning that an agency would be reimbursed at the same amount for 24 hours of training they currently are for 36 hours. The proposed compromise offered by Ms. Rossman to reimburse at \$15/hour for pre-training would represent a cost increase to ODJFS, which is not contemplated in the current budget and not the intent of the agency to enact.

Finally, as related to the concerns expressed about the number of training topics being overwhelming for agencies given the reduced minimum hours of training, ODJFS is aware of training that exists that meets these requirements within the minimum timeframe. Additionally, accreditation can be sought and obtained outside of the context of pre-service training that addresses these topics.