



Safe Children, Stable Families, Supportive Communities

April 16, 2018

Joint Committee on Agency Rule Review

Written Testimony Regarding Chapter 5101:2-36, Screening and Investigation Rules

Public Children Services Association of Ohio

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To Chairman Uecker, Vice-Chair Duffey, and members of the Committee. The Public Children Services Association of Ohio (PCSAO) is writing regarding the Chapter 5101:2-36, Screening and Investigation Rules, on behalf of our member agencies.

On March 5, PCSAO testified before this committee, arguing that these rules were in violation of three JCARR prongs. As you may recall, PCSAO had particular concerns with proposed revised language in 5101:2-36-01, Intake and Screening Procedures, regarding collateral contacts before a report is screened in. At the Committee's request, ODJFS agreed to withdraw the rules and place them in "to be re-filed" status.

While no interested party discussions on these rules have occurred since the hearing, we appreciate that with this re-filing, ODJFS has removed the proposed revised language in question from 5101:2-36-01 to allow for more dialogue.

We thank the Committee for your attention to the concerns we raised regarding these rules overall as well as the specific issue of collateral contacts. We ask for your ongoing attention to ensure that ODJFS establishes a timely, effective stakeholder process to examine if and how the judicious use of collateral contacts during the screening process can help PCSAs make better-informed screening decisions. We will keep you informed as the stakeholder process proceeds and if there is a need for statutory language.

PCSAs are on the front lines of serving Ohio's most vulnerable population---abused and neglected children. We thank ODJFS and the Committee for responding to our concerns and willingness to work together to address those concerns.

April 13, 2018

Joint Committee on Agency Rule Review Hearing (JCARR)

JCARR Hearing on Chapter 5101:2-36, Screening and Investigation Rules

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Good afternoon Chairman Uecker, Vice-Chair Duffey, and members of the Committee. I am again providing testimony regarding the Chapter 5101:2-36, Screening and Investigation Rules, on behalf my agency.

On March 5, as you may recall, I testified before this Committee in opposition to the proposed changes to these rules. At that hearing, I, along with my colleague from Public Children Services Association of Ohio (PCSAO), raised concerns about proposed revised language in 5101:2-36-01, Intake and Screening Procedures, regarding pre-screening collateral contacts. At that hearing, at the Committee's request, ODJFS agreed to withdraw the rules and place them in "to be re-filed" status.

In the version of these rules that were re-filed on April 5, to allow for more stakeholder dialogue and involvement, ODJFS removed the language in question from 5101:2-36-01.

With this testimony, we want to thank the Committee and ODJFS for responding to our concerns regarding this matter. We look forward to working with ODJFS on engaging stakeholders to explore the judicious use of pre-screening collateral contacts and the implementation of these rules. We are also glad that PCSAO plans to keep you informed about the progress of the stakeholder process, should there be a need for statutory language.

In addition to this testimony, I will also provide a brief statement at the JCARR Hearing on Monday.

Thank you.