

Supplemental for the Child and Family Services Reviews Stakeholder Interview Guide

Introduction and Instructions

Stakeholder interviews are conducted to collect information needed to determine whether the state is in substantial conformity with systemic factor federal requirements. Because substantial conformity determinations can be made based on the information the state submits in its Statewide Assessment Instrument, stakeholder interviews may not be necessary to collect information about every systemic factor during the onsite component of the Child and Family Services Reviews. Stakeholder interviews are conducted when additional information is needed to rate a systemic factor item.

The Stakeholder Interview Guide outlines questions for the purpose of collecting specific data and/or information that show how well each systemic factor is functioning statewide. Individuals are selected to participate in stakeholder interviews based on their ability to respond to the Stakeholder Interview Guide assessment questions that target the additional information needed to determine substantial conformity. This supplemental for the Stakeholder Interview Guide provides alternative language and phrases that may simplify Stakeholder Interview Guide assessment questions and provides descriptions of the child welfare requirements as some stakeholders may not be familiar with the terminology used in the Stakeholder Interview Guide.

How to Use Supplemental Child and Family Services Reviews Stakeholder Interview Guide

The supplemental for the Stakeholder Interview Guide is a tool that provides alternative language and phrases that interviewers can apply to all the Stakeholder Interview Guide questions, if needed. The Child and Family Services Reviews team leaders consider experiences of the stakeholder(s) to determine whether alternative language or phrasing of the questions is required to elicit the information needed to inform substantial conformity determinations. Prior to stakeholder interviews, the review team should explore with state staff whether the identified stakeholders will require the use of alternative wording or phrasing of language in the Stakeholder Interview Guide instrument.

When using alternative language and phrasing, review teams are cautioned not to veer from the substance of the question that targets critical stakeholder information needed to assess and rate each systemic factor item. The central aim is to collect data and/or information that show how well each systemic factor item is functioning statewide. When alternative language or phrases are used, it is important to confirm that the stakeholder understands the focus of the question. For example, consider Stakeholder Interview Guide item 21 that targets Periodic Reviews. When using an alternative phrase such as “court hearing,” confirm that the stakeholder understands that the assessment questions are about the periodic review for each child and not any other court hearing such as an adjudicatory hearing or a permanency hearing.

Structure of Child and Family Services Reviews Stakeholder Interview Guide

The supplemental has three sections and an appendix. The first section provides core alternative language and phrasing that can be applied to all Stakeholder Interview Guide questions. The second section provides item specific alternative language. The third section combines the material presented in the first and second sections to provide a limited number of examples of how the alternative language and phrases may be used when interviewing foster and adoptive parents, youth served by the agency, or other stakeholders who may not be familiar with the terminology

used in the Stakeholder Interview Guide. The appendix provides information on the child welfare requirements referenced in the Stakeholder Interview Guide.

Section 1

Alternative Language and Phrasing for Questions – All Items

Section 1 contains the questions and follow-up questions used in the Stakeholder Interview Guide with suggested alternatives. The Stakeholder Interview Guide questions are phrased generically (referring to how “the item is functioning” or “the requirements of this item”) so that each can be tailored for use on any item within the Stakeholder Interview Guide.

Question 1

What statewide information and data are currently used to show whether [the item] is functioning statewide?

Alternatives:

- What information and data do you use to monitor [the requirements of the item]?
- What information and data do you use to show whether [the requirements of this item] are working the way it should be?
- What information and data do you use to determine whether [the requirements of the item] are happening or occurring the way they should be across the state?

Question 1a

If statewide data or information exists, what do the current statewide information and data indicate about whether [the requirements of the item] are functioning/or occurring across the state?

Alternative:

- What do the data or information tell you about how [requirements of this item] are working?
- What do the data or information say about whether [requirements of this item] are actually happening as they should be?

Question 1b

If statewide data or information exists, are there other ways you know about for determining whether [the requirements of the item] are functioning across the state?

Alternatives:

- What other sources of information do you use to monitor [the requirements of this item]?
- Besides this data and information, are there other ways you can tell whether [the item] is operating as it should across the state?
- How else do you know whether [requirements of the item] are happening or occurring across the state?

Question 1c

If statewide information or data do not exist, how do you know whether [the requirements of the item] are functioning across the state?

Alternatives:

- If you don't have statewide information or data, what do you use to monitor [the requirements of this item]?
- If you don't have statewide information or data, how do you know whether [requirements of the item] are happening across the state as they should?
- What type of feedback do you get on how well [this item] is functioning?
- Who has provided feedback on how well [this item] is working and what are they telling you?

Question 2

How do you know whether the referenced information and data are accurate and of good quality?

Alternative:

- Can you rely on the information and data?
- Have there been any problems or complaints with the data or information you have?
- How do you make sure that the quality of the information and data is good and correct?

Question 3

Can you provide any context that helps us understand the scope and limitations of the referenced data and information in terms of how well [the requirements of the item] function statewide (e.g., time frames, geographic representation, size of study, data collection process, relevance of data to assess functioning of requirement)?

Alternative:

- Are there any limitations to the data and information?
- Does this data or information tell you everything you need to know about [the elements of this item]? If not, what's missing?
- How is this data/information collected?
- How often is this data/information collected?
- What would make this data/information more helpful to you to be better able to understand how well [the elements of this item] are functioning?

Question 4

What are the barriers that specifically affect the state's ability to ensure that [requirements of the item function as required]?

Alternative:

- What gets in the way when trying to ensure [the requirements of this item] are working as they should?
- What specific problems or challenges does the state have in making sure that [the elements of this item] are performing as they should be?
- What makes it difficult for the state to make sure that the [requirements of this item] happen the way they should?

Question 4a

If barriers exist, to what extent do these barriers affect the state's ability to ensure that [requirements of the item are functioning]?

Alternative:

- How big are the problems?
- How do the challenges you identified impact the state's ability to ensure that [the item is functioning]?
- Is the state able to address these barriers so that [the item is functioning]?

Section 2

Item-Specific Alternative Language and Phrasing

Section 2 contains words and phrases used in the Stakeholder Interview Guide with suggested alternatives that are not reliant on knowledge of child welfare terminology.

Item 19

Statewide information system

Alternatives:

Electronic case management system; computer system; or, name/acronym of the state's statewide information system, e.g., FACTS, KIDS, FACS

Statewide system data elements

Alternatives:

Provide examples of the required data elements, e.g., whether the child is in foster care; child's date of birth, sex, race, and ethnicity; physical address of placement; identification of permanency goals (reunification, adoption, guardianship, other planned permanent living arrangement)

Item 20

Written case plan

Alternatives:

Family plan; child's plan; treatment plan; or, court-ordered plan

Developed jointly

Alternatives:

Parent participation; parent input; or, incorporate examples of situations where joint planning might occur, e.g., family team meetings, meetings with the case worker

Required provisions

Alternatives:

Provide examples of the required provisions, e.g., description of placement; services to child, parents, and foster parents; information about the child's school progress; the child's health records

Item 21

Periodic review

Alternatives:

Going in front of the judge; court hearing; foster care board/hearing; or, review board hearing. Describe periodic review requirements, e.g., determine the child's safety; review the continuing need for foster care; determine compliance with case plan and progress made towards alleviating or mitigating the causes necessitating placement in foster care

Item 22

Permanency hearing

Alternatives:

Going in front of the judge; court hearing; foster care board/hearing; or, review board hearing. Describe permanency hearing requirements, e.g., determine the permanent plan for the child; in the case of a child who has attained age 16, determine the services needed to assist the child to make the transition from foster care to independent living; consult with the child in an age appropriate manner regarding the proposed permanency or transition plan for the child

Item 23

Termination of parental rights

Alternatives:

Termination of Parental Rights; freeing the child for adoption

Required provisions

Alternatives:

Provide examples of the termination of parental rights requirements, e.g., the child has been in foster care for 15 months of the most recent 22 months; the parent has committed a serious offense such as killing another child. Provide examples of the exceptions, e.g., the child is living with relatives; there is a compelling reason why the parents' rights should not be terminated

Item 24

Notice of hearing and right be heard

Alternatives:

Receive a letter or phone call from caseworker that lets you know about your right to provide comments or information to the court/judge. Receive a notification of court hearings that includes a form that requests input to the court/judge

Item 25

Quality assurance system

Alternative:

Describe the components of the quality assurance system the state has described in the Child and Family Services Plan or Annual Progress and Services Report, e.g., quality data collection; a method for conducting ongoing case reviews; a process for the analysis and dissemination of quality data on all performance measures; and, a process for providing feedback to stakeholders and decision makers and as needed, adjusting state programs and process

Services included in the Child and Family Services Plan

Alternatives

In-home and foster care services; services provided by the agency; services that the agency contracts for

Items 26, 27, and 28

Training system

Alternatives

Training for contracted and non-contracted workers, foster parents, and adoptive parents; training provided by the agency for their staff; training provided by the contractor agency for their staff; training for staff at residential treatment centers or other child care institutions that the agency uses to place children; training provided by the university partner; use the name the state uses for its training programs, e.g., core training, permanency training, MAPS, PRIDE, pre-service or in-service training

Item 29

Service Array

Alternatives:

Using the four categories of services listed in the Stakeholder Interview Guide, provide examples of the types of services children and families may need, e.g., family support services, family preservation services, etc.

Accessible

Alternatives:

Available; able to be used; easy to get to; available nearby

Political jurisdictions covered by the Child and Family Services Plan

Alternative:

Everywhere in the state; across the state; in urban and rural areas; every place where the agency serves children and families

Item 30

Individualized services

Alternatives

Services that the family needs; services tailored to what the child/family needs; services provided in a way the family needs them—in their home, in the language child/parent/family can understand or uses to communicate

Item 31

Ongoing consultation

Alternatives

Gather input; meet with; discuss and plan together; feedback loops and adjustments

Child and Family Services Plan and Annual Progress and Services Reports

Alternatives

The documents the agency creates for the federal government to describe the services they provide and the state's goals and objectives; the plan the state agency has for serving children and families; the written plan that describes the services the agency provides and the goals and outcomes for the children served; the state's five year plan; the IV-B plan

Item 32

Other federal programs

Alternatives

Provide examples of other federal programs serving the same population, e.g., Medicaid, Temporary Assistance for Needy Families, Housing and Urban Development (federal housing program), child support

Item 33

State standards

Alternatives

Foster care licensing regulations or policies; requirements to be a foster or adoptive parent; provide examples of specific standards, e.g., reference checks, home visits, physical space requirements

Title IV-B or IV-E funds

Alternatives

Federal funding; federal dollars used to support provide foster care payments and pay for services to children and families

Item 34

Criminal background check

Alternative

National fingerprint based check

Item 35

Reflect the ethnic and racial diversity

Alternatives

The demographics of foster parents are similar to the race and ethnicity of children needing foster or adoptive homes

Item 36

Cross-jurisdictional resources

Alternatives

Provide examples of resources the state may use to identify placements in other counties or states, e.g., national or state adoption exchanges, and parent/relative locator services

Section 3

Section 3 integrates the content of sections 1 and 2 to provide examples illustrating how questions and follow-up questions in the Stakeholder Interview Guide may be modified with alternative language and phrases. For each example provided, first the Stakeholder Interview Guide Item and question is provided followed by an alternative wording/phrasing of the question. Examples are not being provided for all the Stakeholder Interview Guide questions and follow-up questions. Rather, reviewers can use these examples to apply similar approaches to elicit necessary information from the stakeholder(s) being interviewed. When using alternative language and phrasing, review teams are cautioned not to veer from the substance of the question, to gather descriptive information that is not needed for the purpose of the review, or to otherwise deviate from the requirements of the systemic factor. When using alternative language, it is important to confirm that the stakeholder understands the focus of the question.

Item 20: Written Case Plan

How well is the case review system functioning statewide to ensure that each child has a written case plan that is developed jointly with the child's parent(s) that includes the required provisions?

Item 20: Written Case Plan – Alternative Wording/Phrasing

How well does [name of state]'s case review system do to make sure that each child has a written case that is developed with input from the child's parent(s) and that the plan address such things as a description of the child's placement, the child's health and education records, and services that the child, family, and foster family need?

Item 20: Written Case Plan Question 4

What are the barriers that specifically affect the state's ability to ensure that each child has a written case plan that is developed jointly with the child's parent(s) that includes the required provisions?

Item 20: Written Case Plan – Alternative Wording/Phrasing

What gets in the way of [name of agency]'s ability to make sure that each child has a written case plan that is developed with the parents' input and that the plan covers things like a description of the child's placement, the child's health and education records, and identifies the services that the child, family, and foster family need?

Item 27: Ongoing Staff Training

How well is the staff and provider training system functioning statewide to ensure that ongoing training is provided for staff that addresses the skills and knowledge needed to carry out their duties with regard to the services included in the Child and Family Services Plan?

Item 27: Ongoing Staff Training – Alternative Wording/Phrasing

How well does [name of agency]'s staff and provider training system work so that the workers conducting Child Protective Services investigations, or those providing family preservation and support services, foster care and adoption services, or independent living services receive ongoing training to give them the knowledge and skills they need to do their work? How well does the training system work for their supervisors?

How well do the staff and provider training system work so that the front line and supervisory staff of the contracting agencies – or the staff in child placement agencies the state uses to place children – receive ongoing training that addresses the skills and knowledge that they need to provide [contracted] service(s)?

Item 29: Array of Services

How well is the service array and resource development system functioning to ensure that the following array of services is accessible in all political jurisdictions covered by the Child and Family Services Plan?

1. Services that assess the strengths and needs of children and families and determine other service needs;
2. Services that address the needs of families in addition to individual children in order to create a safe home environment;
3. Services that enable children to remain safely with their parents when reasonable; and
4. Services that help children in foster and adoptive placements achieve permanency.

Item 29: Array of Services – Alternative Wording/Phrasing

How well is the system working to ensure that the following types of services are available and accessible to children and families served by [name of the agency] in all places in [name of the state]?

1. Services to assess the strengths and needs of children and families and help identify what services they need;
2. Services that help families and children create a home that is safe;
3. Services that help children stay safely with their families whenever possible; and
4. Services that help children in foster care either go back to their families, be adopted or under a guardianship; or some other planned permanent living arrangement.

Item 29: Array of Services Question 1

What statewide information and data are currently used by the state to show:

- Whether the state has all the above referenced categories of services in each political jurisdiction covered by the Child and Family Services Plan?
- Whether there are any gaps in the above-referenced categories of services in terms of the accessibility of such services across all political jurisdictions covered by the Child and Family Services Plan?

Item 29: Service Array Question 1 – Alternative Wording/Phrasing

What information and data do you use to determine whether [name of the state] has services across the state to assess child and family strengths and needs; services to create and maintain a safe home; help children stay with their families; and services to help children in foster and adoptive homes achieve permanency?

What information or reports do you use to show whether there are any problems in getting the services that help figure out what families need; make homes safe for children and families; and, help children go home, get adopted or live independently?

Item 29: Service Array Question 1a(a)

What do the current statewide information and data indicate about:

- (a) whether the state has all the above-referenced services in each political jurisdiction covered by the Child and Family Services Plan?

Item 29: Service Array Question 1a(a) – Alternative Wording/Phrasing

What do the current data tell you about whether all of these types of services are available in the places that [name of agency] serves?

Does the current information or data tell you that there are some areas of [name of state] that don't have all of these types of services?

Item 29: Service Array Question 1a(b)

What do the current statewide information and data indicate about:

- (b) whether there are any gaps in the above-referenced array of services in terms of accessibility of such services across all political jurisdictions covered by the Child and Family Services Plan?

Item 29: Service Array Question 1a(b) – Alternative Wording/Phrasing

What does the information about assessment services, independent living services, mentoring, counseling, substance abuse treatment, and the other types of services families need tell you about whether there are any problems in getting those services in the state?

What do the data and information tell you about whether the types of services you need as a [foster or adoptive parent/youth] are accessible and available across the state?

Item 29: Service Array Question 1b(a)

Are there other ways you know about for determining:

- (a) whether the state has all the above-referenced services in each political jurisdiction covered by the Child and Family Services Plan?

Item 29: Service Array Question 1b(a) – Alternative Wording/Phrasing

Besides this data and information, what other ways do you have for knowing whether these services are available in the places that [name of agency] serves?

Item 29: Service Array Question 1b(b)

Are there other ways you know about for determining:

- (b) whether there are any gaps in the above-referenced array of services in terms of accessibility of such services across all political jurisdiction covered by the Child and Family Services Plan?

Item 29: Service Array Question 1b(b) – Alternative Wording/Phrasing

Besides this data and information, are there other ways you monitor whether there are any gaps in the services that children and families need? Where do you get that information and what is it telling you?

Item 29: Service Array Question 1c(a)

How do you know:

- (a) whether the state has all the above-referenced services in each political jurisdiction covered by the Child and Family Services Plan?

Item 29: Service Array Question 1c(a) – Alternative Wording/Phrasing

Without having statewide information or data, how do you know whether across the state there are services - those that assess what families need, make and keep homes safe, or help children go home, get adopted, or live in another permanent placement, are available?

Item 29: Service Array Question 1c(b)

How do you know:

- (b) whether there are any gaps in the above-referenced array of services in terms of accessibility of such services across all political jurisdictions covered by the Child and Family Services Plan?

Item 29: Service Array Question 1c(b) – Alternative Wording/Phrasing

Without statewide data or information, how do you know if there are any of these services are not accessible within the [name of state]?

Does the data/information tell you everything you need to know about the availability of and access to these types of services? If not, what's missing?

Item 29: Service Array Question 4(a)

What are the barriers that specifically affect the state's ability to ensure that:

- (a) the state has all the above-referenced services in each political jurisdiction covered by the Child and Family Services Plan?

Alternative to Item 29: Service Array Question 4(a)

What gets in the way when trying to ensure that these types of services are available to families in all areas of the state?

Item 29: Service Array Question 4(b)

What are the barriers that specifically affect the state's ability to ensure that:

- (b) there are no gaps in the above-referenced array of services in terms of accessibility of such services across all political jurisdictions covered by the Child and Family Services Plan?

Alternative to Item 29: Service Array Question 4(b)

What specific problems or challenges does [name of the state/agency] have in making sure that there are no gaps in these services and that families can access the services they need?

Item 29: Services Array Question 4a(a)

If barriers exist, to what extent do these barriers affect the state's ability to ensure that:

- (a) the state has all the above-referenced services in each political jurisdiction covered by the Child and Family Services Plan?

Alternative to Item 29: Service Array Question 4a(a)

How big are the problems you identified?

How do the challenges you identified impact the [name of the state/agency]'s ability to ensure that these types of services are available and accessible to families working with [name of the agency]?

Item 29: Service Array Question 4a(b)

If barriers exist, to what extent do these barriers affect the state's ability to ensure that:

- (b) there are no gaps in the above-referenced array of services in terms of accessibility of such services across all political jurisdictions covered by the Child and Family Services Plan?

Alternative to Item 29: Service Array Question 4a(b)

How is [name of the agency] able to address these barriers so that there are no gaps in these services for children, youth, families, including foster and adoptive families?

What kinds of things does [name of the state/agency] do to tackle these gaps in the service array?

Item 33: Standards Applied Equally Question 1b

Are there other ways you know about for determining whether the state's standards are applied equally to all licensed or approved foster family homes or child care institutions receiving title IV-B or IV-E funds?

Alternative to Item 33: Standards Applied Equally Question 1b

Besides this data, what other ways do you have for knowing whether the [name of agency] applies the foster care licensing standards and child placement agency licensing regulations to all licensed foster family homes or child care institutions receiving federal child welfare dollars?

Appendix

Criminal Background Check Section 471(a)(20)(A) of the Social Security Act

The criminal background check for prospective foster and adoptive parents includes fingerprint-based criminal record checks of the national crime information databases.

Child Care Institution Section 472(c) of the Social Security Act

Means a private child-care institution, or a public child-care institution which that accommodates no more than twenty-five children, which is licensed by the state in which it is situated or has been approved, by the agency of such state responsible for licensing or approval of institutions of this type, as meeting the standards established for such licensing, except, in the case of a child who has attained 18 years of age, the term shall include a supervised setting in which the individual is living independently, in accordance with such conditions as the Secretary shall establish in regulations, but the term shall not include detention facilities, forestry camps, training schools, or any other facility operated primarily for the detention of children who are determined to be delinquent.

Federal or Federally Assisted Programs ACYF-CB-PI-14-03

Examples of federal or federal assistance programs include: Temporary Assistance for Needy Families, Medicaid, Child Care, Head Start, Supplemental Nutrition Assistance Program, Housing and Urban Development programs, and Community-Based Child Abuse Prevention programs.

Foster Family Home Section 472(c) of the Social Security Act

Means a foster family home for children, which is licensed by the state in which it is situated or has been approved, by the agency of such state having responsibility for licensing homes of this type, as meeting the standards established for such licensing.

Interstate Compact for Placement of Children 471(a)(26) of the Social Security Act

States shall directly or by contract complete home study requests from other states within 60 days of receipt of the request. If the state fails to comply within the 60-day period as a result of circumstances beyond the control of the state (such as a failure by a federal agency to provide the results of a background check, or the failure by any entity to provide completed medical forms, requested by the state at least 45 days before the end of the 60-day period), the state shall have 75 days to comply with clause if the state documents the circumstances involved and certifies that completing the home study is in the best interests of the child.

Periodic Review Requirements 475(5)(B) of the Social Security Act

- Occurs periodically but no less frequently than once every 6 months from the date on which the child entered foster care by either a court or by administrative review
- Determines the child's safety
- Reviews the continuing necessity for foster care placement
- Reviews the extent of compliance with the case plan and progress made toward alleviating or mitigating the causes necessitating placement in foster care
- Projects a likely date for reunification, legal guardianship, or adoption

Permanency Hearing Requirements 475(5)(C) of the Social Security Act

- Held within 30 days of a determination that reasonable efforts to return the child home are not required
- Held at least once every 12 months while the child is in foster care, starting from the date the child has entered foster care

- Determines the permanency plan for the child – whether and when the child would be reunified or placed for adoption and the state would file for Termination of Parental Rights, or referred for legal guardianship, or (if the state has documented to the court a compelling reason why it would not be in the child's best interests to pursue these permanency options) placed in Other Planned Permanent Living Arrangements
- For a child not being reunified with parents, considers in-state and out-of-state placement options
- In the case of a child placed out-of-state, determines whether the out-of-state placement continues to be appropriate and in the best interests of the child
- In the case of a child who has attained age 16, determines the services needed to assist the child in making the transition from foster care to independent living
- Consult in an age-appropriate manner with the child regarding the proposed permanency or transition plan for the child

Statewide System Data Elements

- Status – In foster care or no longer in foster care
- Demographic characteristics – date of birth, sex, race, ethnicity, disability, medically diagnosed condition requiring special care; ever been adopted
- Location – child's physical location
- Goals for permanency – reunification, adoption, guardianship, other planned permanent living arrangement, not yet established

Termination of Parental Rights Section 475 (5)(E) of the Social Security Act

The agency seeks Termination of Parental Rights when the child has been in care for at least 15 of the most recent 22 months, or a court of competent jurisdiction has determined that:

- The child is abandoned; or
- The child's parents have been convicted of one of the felonies (1) murder of another child of the parent; (2) voluntary manslaughter of another child of the parent; (3) aiding or abetting, attempting, conspiring, or soliciting to commit such a murder or such voluntary manslaughter; or (4) a felony assault that resulted in serious bodily injury to the child or another child of the parent.

Exceptions to the Termination of Parental Rights requirement include when:

- The child is being cared for by relatives;
- The agency has documented in the case plan a compelling reason for determining that Termination of Parental Rights would not be in the best interests of the child; or
- The state has not provided to the family the services that the state deemed necessary for the safe return of the child to the child's home if reasonable efforts are required to be made with respect to the child.

Written Case Plan Requirements Section 475 [45 U.S.C. 675], 45 CFR 1356.21(g)

- A description of the type of home or institution in which a child is to be placed, including a discussion of the safety and appropriateness of the placement
- A plan for assuring that the child receives safe and proper care and that services are provided to the parents, child, and foster parents in order to improve the conditions in the parents' home, facilitate return of the child to his own safe home or the permanent placement of the child, and address the needs of the child while in foster care, including a discussion of the appropriateness of the services that have been provided to the child under the plan
- The health and education records of the child, including the most recent information available regarding
 - Names and addresses of the child's health and educational providers
 - Child's grade level performance and school record

- Record of the child's immunizations and medications; and
- Any other relevant health and education information concerning the child determined to be appropriate by the agency
- For a child age 16 or over, a written description of the programs and services which will help such child prepare for the transition from foster care to independent living
- For a child with a permanency plan of adoption or placement in another permanent home, documentation of the steps to find an adoptive family or other permanent living arrangement for the child, to place the child with an adoptive family, a fit and willing relative, a legal guardian, or in another planned permanent living arrangement, and to finalize the adoption or legal guardianship
 - For a child with respect to whom the permanency plan is placement with a relative and receipt of kinship guardianship assistance payments, a description of: Steps taken to determine that it is not appropriate for the child to be returned home or adopted;
 - Reasons for any separation of siblings during placement;
 - Reasons why a permanent placement with a fit and willing relative through a kinship guardianship assistance arrangement is in the child's best interests;
 - Ways in which the child meets the eligibility requirements for a kinship guardianship assistance payment;
 - Efforts made to discuss adoption by the child's relative foster parent as a more permanent alternative to legal guardianship and, in the case of a relative foster parent who has chosen not to pursue adoption, documentation of the reasons; and
 - Efforts made to discuss with the child's parent or parents the kinship guardianship assistance arrangement, or the reasons why the efforts were not made
- A plan for ensuring the educational stability of the child while in foster care, including:
 - Assurances that each placement takes into account the appropriateness of the current educational setting and the proximity to the school in which the child is enrolled at the time of placement; and
 - An assurance that the agency has coordinated with local educational agencies to ensure that the child remains in the school in which the child is enrolled at the time of each placement; or if remaining in such school is not in the best interests of the child, assurances to provide immediate and appropriate enrollment in a new school, with all of the educational records of the child provided to the school.