


OCFP Office of Child and Family Policy	Department of Children and Family Services	
	Index No: 2000.06	Issuance Date: April 12, 2000
	Origin of Request: Interethnic Placement Act Training – Part II	
	Distribution: X,Z, and C-3	
	Key Words: IEPA, IEPA Assessment Form, individualized assessment, placement selection, Child/Caregiver Matching Tool.	
Approved by: 		

INTERPRETATION

Applicable To: Department and POS staff who select placements for children in foster or adoptive homes

Policy Citation: Procedure 301.60, Placement Selection Criteria

The questions and responses below are a continuation of the Policy Interpretation 2000.07 issued to staff on February 23, 2000. Policy Interpretation 2000.07 addressed issues raised during the statewide training on Procedure 301.60, Placement Selection Criteria, and two new forms: CFS 2017, Child/Caregiver Matching Tool and CFS 2018, Interethnic Placement Act (IEPA) Assessment. Several questions in this Interpretation came from the Statewide Foster Parent Advisory Council. The remainder were submitted to the Office of Child and Family Policy by staff.

Questions that specifically address the formatting of the CFS 2017, Child/Caregiver Matching Tool, are being reviewed by a workgroup. The workgroup will review the matching tool, compare it with other forms that document the child's needs and/or caregivers' ability to meet those needs, and recommend changes to improve its function.

Question 1. Can foster parents obtain a blank copy of the matching tool so they have something to go by when the worker calls to discuss a possible placement?

Yes. Blank copies of the CFS 2017 may be obtained from Department or private agency caseworkers or resource staff, or by writing or calling:

Office of Child and Family Policy
406 E. Monroe St., Station 65
Springfield, Illinois 62701
Phone: 217-524-1983
E-mail: CFPolicy@idcfs.state.il.us.



Question 10: Does the IEPA policy apply to all wards, even those who are 18 years of age and over?

IEPA applies to all foster and adoptive placements selected by a placing worker, including placements that are selected for wards who are 18 years of age or older and who are unable to live independently.

Department wards living independently (permanency goal of "independence") may select their own living arrangement. IEPA does not apply since the living arrangements they make by themselves are not considered "foster" or "adoptive" placements. There is no "placing worker" in this instance and completion of the matching tool is not required.

Question 11: On the CFS 2017, Child/Caregiver Matching Tool, under Family Membership, Child Characteristics, the only goal listed is return home to mother or father. What about children with other goals such as independence, subsidized guardianship, termination, etc. How does the selected goal affect the completion of this form?

The placing worker must complete the Child/Caregiver Matching Tool whenever a new placement is being selected, regardless of the permanency goal. As noted in Question 10 above, when a ward is selecting his or her own living arrangement (permanency goal of "independence" and not a "foster" or "adoptive" placement), IEPA does not apply and the matching tool does not have to be completed.

Question 12: What if a child entering substitute care is attending a religious school? What should be considered when placing the child? Does the parent have a right to specify what school the child attends?

While a parent maintains the right to specify the child's religious affiliation as a residual parental right, a parent may not insist that the child attend a private school. A request for private schooling should be reviewed along with other child and family needs and issues during the comprehensive assessment process. If it is in the child's best interests to continue private schooling, there may be potential caregivers who are willing to make arrangements for the child to continue attending the same school, or to attend a school elsewhere with the same religious affiliation.

When the permanency goal is return home, finding a placement within the child's school district is a primary consideration. This can be a basis for choosing one caregiver over another, when taken into consideration along with the other individual and special needs of the child.

Please note that the Department will not pay for a child in the custody or guardianship of the Department to attend a private school, regardless of whether the child was attending the school prior to placement. If the parents wish to continue paying for the child to attend a private school while the child is in placement, the Department may consider this in the assessment process. However, based upon the assessment, the Department may determine that the child should not attend the private school designated by the parents.

Question 13: Workers are told that they cannot consider race for purposes of placement selection. Yet, on the CFS 2018, Inter-ethnic Placement Act Assessment Form, workers are asked if they agree that race is an issue. Isn't this entrapment?

No. IEPA requires that race, culture and ethnicity cannot be routinely considered in placement decisions. The CFS 2018 documents that the worker followed an established process to determine whether the request to consider race arises out of the unique individual identity needs of the particular child. The CFS 2018 accomplishes several purposes. First, it documents who raised race as an issue. Then, it documents that the worker and supervisor reviewed the request, and when necessary or required, sought a clinical assessment. The CFS 2018 helps workers document their professional judgment when evaluating these requests.

Question 14: When a child is stepping down from an institutional placement, who completes the matching tool - the caseworker or the child and family team?

The placing caseworker is responsible for completing the matching tool, even if the placement is selected as a joint responsibility of the child and family team.

Question 15: Is the purpose of the CFS 2017, Child/Caregiver Matching Tool, to document why one particular home is selected over another, or to document why the home was selected?

The Child/Caregiver Matching Tool documents why a caregiver that has been considered is or is not selected. If the placing worker is selecting the best placement from among three available homes, each of which appears to be able to meet the child's needs, the worker should complete three separate forms – one for each home. The matching tool is used to review the strengths and weaknesses of each available home, and to document the criteria upon which the final selection was made. The selected caregiver must be able to meet the identified, individual needs of the particular child.

Question 16: Who can raise the issue of race in placement selection (e.g. next door neighbor, therapist)? When must a worker request a clinical staffing?

The child, parent, worker, supervisor, or anyone with a close relationship to the child can raise the issue. The CFS 2018 states that a clinical staffing must be requested when 1) the worker agrees that race, culture or ethnicity should be used as a factor or is the person who is raising the issue, or 2) the worker disagrees and the person who raised the issue challenges the worker's decision. The worker and supervisor may also request a clinical staffing anytime they believe that a staffing will assist in arriving a placement decision in the best interests of the child.

Question 17: How and when does someone report a suspected IEPA violation? Are there any recording requirements?

Anyone, including staff, aware of an IEPA violation, or wishing to file a complaint, should contact the Department's IEPA Monitor as soon as possible after the violation occurs or is discovered. Complaints can be made orally or in writing. The Department will protect anyone who reports and

IEPA violation from retaliation for having made the report. The IEPA Monitor is:

Shelly Knuppel
Office of Legal Services
Department of Children and Family Services
406 E. Monroe, Station 71
Springfield, IL 62701
(217) 785-2558

Question 18: A POS agency runs a separate adoption program that is not "funded" by DCFS or other federal dollars, and through that program only places African American children with African American families. The agency also operates other DCFS/Title IV-E funded programs. Does the separate adoption program violate IEPA if it is not funded by DCFS?

Yes. If the POS agency receives any Title IV-E funding for any of its programs, then all programs operated by the agency must comply with IEPA. The POS agency's separate adoption program will violate IEPA, even if it is privately funded.