


To: DCF/DMCPS Administrator  
DCF Area Administrators  
Child Placing Agency Directors  
Child Welfare Agency Directors  
County Departments of Community Programs Directors  
County Departments of Developmental Disabilities Services Directors  
County Departments of Human Services Directors  
County Departments of Social Services Directors  
Group Home Providers  
Tribal Social Service/Indian Child Welfare Directors  
Private Child Placing Agencies  
Residential Care Center Providers  
Shelter Care Providers  
Tribal Chairpersons

From: Fredi-Ellen Bove   
Administrator

Re: Administrative Rule Changes Related to Public Adoptions

#### **PURPOSE**

The purpose of this memo is to provide an overview of the revisions to the three administrative rules related to adoptions: Chapters DCF 42, 50, and 51.

#### **BACKGROUND**

The Joint Legislative Council Study Committee on Adoption Disruption and Dissolution made recommendations that resulted in four bills signed into law on April 25, 2016: 2015 Wisconsin Acts 378, 379, 380, and 381. The changes in these Acts required the Department to revise administrative rules Chapters DCF 50 and 51.

#### **INFORMATION SUMMARY**

Effective September 1, 2018, Chs. DCF 50 and 51 are renamed, revised and reorganized to incorporate the new statutory changes and clarify applicability of adoption processes and requirements. There are no new requirements for counties or private child placing agencies as a result of this administrative rule update, unless a private child placing agency under contract with the Department, or a county is acting as the public adoption agency.

Chapter DCF 42, State Adoption Information Center, is renumbered as Chapter DCF 49. The previous ch. DCF 49, Juvenile Worker Intake Training, is repealed. Chapter DCF 82 is the current juvenile worker intake training rule.

Chapter DCF 50 has been renamed "Facilitating Public Adoptions and Adoption Assistance", [https://docs.legis.wisconsin.gov/code/admin\\_code/dcf/021\\_099/50](https://docs.legis.wisconsin.gov/code/admin_code/dcf/021_099/50). The Special Needs Adoption Program (SNAP) is now Public Adoptions. All processes and requirements related to public adoptions has been transferred to DCF 50, except for the training requirements.

Chapter DCF 51, previously named, "Adoption of Children with Special Needs and Preadoption Preparation Training," has changed to "Preadoption Training." The new rule is revised to include the new requirements in s.48.84 for the purposes of preadoption training.

### **Public Adoptions**

The revised Chapter DCF 50 includes a new definition of “public adoption”, which allows children and families to be served, regardless of the child’s eligibility for adoption assistance. Chapter DCF 50 defines public adoption as “the adoption of a child under the guardianship of the department, a county department, or a tribal child welfare department in this state if the adoption is under the laws of this state”.

### **Adoption Assistance (AA)**

The eligibility requirements have been modified to include children meeting the definition of an Indian Child under s. 48.02(8g).

The definition of “at high risk” for developing special needs to be eligible for adoption assistance with no subsidy was moved from the definition section of the administrative rule to the eligibility section. To assist with understanding and determining this eligibility, the Department has developed a form, DCF-F-5284-E “Determination of “High Risk” Status for Adoption Assistance”, <https://dcf.wisconsin.gov/forms>. This form may be used to replace the letter from a medical provider previously required. The public adoption agencies in each region may answer questions or assist counties with this form and, if completing an adoption with the family, are responsible for submitting the form to the Department during the adoption assistance application process.

### **Preadoption Preparation Training**

The revised Chapter DCF 51:

- Increases the required training for first-time adoptive parents from 16 to 25 hours,
- requires that at least 6 of the hours must be delivered in person, either individually or in a group,
- requires that at least 6 hours of training must be appropriate to the specific needs of the child to be adopted,
- requires that no more than 5 of the 25 hours to be books or periodicals,
- adds the issues of “trauma issues related to adoption”, “sexual abuse”, and “childhood development” to the list of required topics that the training must cover, and
- requires adoption agencies to offer post adoption training when requested by adoptive parents.

To ensure compliance with the new preadoption training requirements, the Department has worked with the UW-Milwaukee Training Partnership to develop new preadoption training curriculum. Guidance has been developed for counties and agencies to understand the “crosswalk” between the preadoption curriculum and initial foster care licensing curriculum.

Two new preadoption curriculums were developed. The first, called “Building Forever Families”, is a 19-hour, 3-day, in-person training offered to families required to complete preadoption preparation training when adopting through public adoptions.

Many competencies required for preadoption preparation training in Ch. 51 Administrative Code are the same or similar to competencies required for initial licensing training under Ch. 56 Administrative Code. However there are competencies that do not overlap; to ensure that families are not required to duplicate training, the Department has developed a second preadoption curriculum to build on the “Foundations” curriculum required for initial foster care licensing training. “Fostering to Forever” is a 6-hour, 1-day, in-person training offered to families who have completed some or all of the “Foundations” curriculum and are required to complete preadoption training.

The “Fostering to Forever” training will be available to families who are not preadoptive families but wish to take the training to meet ongoing training hours required under Chapter DCF 56. Families may use these training hours to meet a portion of ongoing training hours if the licensing agency approves.

The attached guidance provides information on which components of each curriculum meets each training requirement. The Department recommends that counties and private child placing agencies have

Level 2 foster parents complete “Foundations” curriculum modules 3, 4, 5, and 8 first to be prepared for a possible first time adoption. These modules meet 15 of the 25 required preadoption preparation training.

The Department, recommends but does not require licensing agencies to accept the 3-day preadoption training, “Building Forever Families” as meeting some of the initial foster care licensing training hours. If the licensing agency wishes to accept the “Building Forever Families” training as meeting a portion of the required initial licensing hours, the licensing agency must continue to document and submit an exception to Ch. DCF 56.14(7)(a) Administrative Code to the DCF Exceptions Panel.

The public adoption agency assigned to work with preadoptive families is responsible for ensuring that preadoptive families meet any required preadoption preparation training requirements, including the child specific training. The public adoption agency will work with the family to determine whether any previously completed training may be considered to meet the required child specific hours. Families adopting on or after September 1, 2018 must be in compliance with new training requirements under Chapter DCF 51.

REGIONAL OFFICE CONTACT: DCF Area Administrator

CENTRAL OFFICE CONTACT: Adoptions Program Specialist  
Bureau of Permanency and Out-of-Home Care  
(608) 422-6905

Out-of-Home Care Specialist  
Bureau of Permanence and Out-of-Home Care  
(608) 422-6937

MEMO WEB SITE: <http://dcf.wisconsin.gov/cwportal/policy>

ATTACHMENT LINK: Preadoption Preparation Training and Licensing Training “Crosswalk”  
<https://dcf.wisconsin.gov/cwportal/fc/training>

## Preadoption Preparation Training and Licensing Training “Crosswalk”

This document serves as guidance for foster care and public adoption agencies regarding the “crosswalk” between required foster care licensing training and preadoption preparation training for first time adoptive parents. Families may fall into four categories. Depending on the category and whether the family is a “conversion family” or “waiting family”, the family has options for completing required initial foster care licensing training and preadoption training. “Conversion families” are defined as families licensed by a county or a private child-placing agency who have received a foster care placement of a child through the county or an agency contracted on behalf of a public child welfare agency and have now been identified as the adoptive resource for a child(ren). “Waiting families” are defined as families licensed and approved for adoption by the Public Adoption agency.

### 1. *Conversion Families (Level 2, 3, or 4) who:*

- Completed Level 2 initial foster care licensing training or the Level 3 or Level 4 foster parent pre-placement training.
- Must complete the preadoption training (first time adoptive parents).

The “Foundations” curriculum that the family completed during initial licensing training/foster parent pre-placement training will meet much of the preadoption training requirements. To meet the additional preadoption competencies, the family will be required to take the 6-hour “Fostering to Forever” curriculum, as well as 6 hours of child specific training. Depending on the ongoing licensing training the family has completed, those hours could possibly meet the child specific preadoption training. The public adoption agency will work with the family to determine whether the child specific training is met by other training hours.

### 2. *Conversion families (Level 2) who:*

- Have not completed initial licensing training and are not close to finishing that training prior to adoption.
- Plan to continue fostering with the county/private child-placing agency and will be required to finish the initial licensing training in order to continue fostering.

The “Foundations” curriculum modules 3, 4, 5, and 8 will meet 15 hours of the required 25 preadoption training hours. To meet the preadoption training requirements, the family will take these modules, the 6-hour “Fostering to Forever” curriculum, and 6 hours of child-specific training requirements. To meet the initial foster care licensing training requirement, the family must complete “Foundations” curriculum modules 1, 2, 6, 7, and 9 (this can be pre- or post-adoption). **The Department recommends that Level 2 foster parents complete “Foundations” curriculum modules 3, 4, 5, and 8 first to be prepared for a possible first time adoption.**

### 3. *Waiting families or conversion families (Level 2) who:*

- Have not completed initial foster care licensing training.
- Plan to close their license after adoption but prior to the end of their initial licensing period.

Waiting families will complete the 19-hour “Building Forever Families” curriculum and 6 hours of child-specific training. Conversion families will work with the county and public adoption agency to determine if, in addition to the 6 hours child specific training, the family should complete:

- 15 hours of “Foundations” curriculum modules 3, 4, 5, and 8, and the 6 hour “Fostering to Forever” curriculum, **OR**
- 19-hour “Building Forever Families” curriculum.

### 4. *Waiting families or conversion families (Level 2) who:*

- Have taken the 19-hour “Building Forever Families” curriculum and the 6 hours child-specific training.
- Have not completed initial foster care licensing training.
- Will not close their license prior to the end of the initial licensing period for any reason such as:
  - Have not adopted prior to the end of the licensing period
  - Would like to keep their license open for subsequent adoptions
- Are interested in fostering with a county or private agency post-adoption
- Are waiting families returning to adopt for a second time and need to complete initial licensing training.

The family has met the preadoption training requirements and now must meet initial licensing requirements. The 19-hour “Building Forever Families” curriculum may be considered to meet much of the initial foster care licensing training requirements. The family must complete 12 hours of “Foundations” curriculum modules 1, 2, 3 and 9 to finish the initial licensing requirements. **The licensing agency must be in agreement and must request and document an exception to this requirement under Ch. 56.14(7)(a).**

<p><b>Conversion Families, Initial Licensing Level 2/Foster Parent Pre Placement Level 3 and 4 Complete</b></p>	<p><b>Conversion families with no/few initial licensing prior to adoption and will continue fostering with the county/private agency</b></p>	<p><b>Waiting families or conversion families with no/few initial licensing, adopting and closing license prior to end of initial licensing period</b></p>		<p><b>Waiting families who keep license open past initial licensing period (do not adopt yet, will keep open for subsequent adoptions, want to foster with the county, etc.) or waiting families coming back to adopt for a second time and did not complete initial licensing training.</b></p>	
<p><i>Meets Level 2 Initial Licensing/Level 3 and 4 Foster Parent Pre Placement and Adoption</i></p>	<p><i>Meets Adoption and Level 2 Initial Licensing</i></p>	<p><i>Meets Adoption</i></p>		<p><i>Meets Adoption and Level 2 Initial Licensing</i></p>	
<p>6 hours pre-placement</p>	<p>6 hours pre-placement</p>	<p>6 hours pre-placement</p>		<p>6 hours pre-placement</p>	
<p>30 hours initial licensing for Level 2/Foster Parent Pre Placement for Level 3 and 4 (All of Foundations Modules)</p>	<p>15 hours initial licensing for Level 2 (Foundations Modules 3, 4a, 4b, 5, 8)</p>	<p>15 hours initial licensing for Level 2 (Foundations Modules 3, 4a, 4b, 5, 8)</p>	<p>19 hours general adoption competency (Building Forever Families)</p>	<p>19 hours general adoption competency (Building Forever Families)</p>	
	<p>6 hours general adoption competency (Fostering to Forever)</p>	<p>6 hours general adoption competency (Fostering to Forever)</p>			<p>6 hours child specific adoption</p>
	<p>6 hours child specific adoption</p>	<p>6 hours child specific adoption</p>	<p>12 hours initial licensing for Level 2 (Foundations Modules 1, 2, 3, 9)</p>		<p>6 hours child specific adoption</p>
	<p>15 hours initial licensing for Level 2 (Foundations Modules 1, 2, 6, 7, 9)</p>	<p>15 hours initial licensing for Level 2 (Foundations Modules 1, 2, 6, 7, 9)</p>			
<p>6 hours general adoption competency (Fostering to Forever)</p>	<p>6 hours child specific adoption (could count ongoing licensing training as appropriate)</p>	<p>6 hours child specific adoption (could count ongoing licensing training as appropriate)</p>		<p>6 hours child specific adoption (could count ongoing licensing training as appropriate)</p>	
<p>Total of 48 hours</p>	<p>Total of 48 hours</p>	<p>Total of 33 or 31 hours</p>		<p>Total of 43 hours</p>	