**[SOCIAL WORKER] (Social Worker) Direct:**

**Goals**:

1. **Background**
2. **Establish [PETITIONER]’s fitness as a parent for [CHILD]**
3. **Observations of [CHILD] with [PETITIONER]**
4. **Termination of Parental Rights is appropriate (D.C. Code § 16-2353(b)):**
5. **Establish that birth mother’s withholding consent is contrary to the best interests of [CHILD]**
6. **Recommendations**

**Background**

1. Please state your name and spell it for the record.
	1. *[SOCIAL WORKER]*
2. Are you currently employed?
	1. *Yes.*
3. Where are you employed?
	1. *[AGENCY]*
4. What is your position there?
	1. *Social worker*
5. What are your responsibilities in that position?
	1. *Responsible for making sure that my 14 clients have all med, ed, emotional needs met. See them twice a month, supervise visits with birth parents. Have to help achieve the permanency goal.*
6. How long have you worked at [AGENCY]?
	1. *2.5 years*
		1. Did you work elsewhere as a social worker before you began at [AGENCY]?
			1. *[PREVIOUS EMPLOYER]*
7. [SOCIAL WORKER], can you please describe your educational background?
	1. [BACKGROUND]
		1. Graduate:
			1. Do you have a social work degree?
				1. MSW from [UNIVERSITY]
			2. What year did you graduate?
				1. [YEAR]
8. Are you a licensed social worker?
	1. *Yes.*
9. In what state(s) are you licensed?
	1. *DC and Maryland*

**Familiarity With the Case**

1. [SOCIAL WORKER], do you know [CHILD]?
	1. Yes.
2. How do you know [HIM/HER]?
	1. *I am the social worker assigned to work on [HIS/HER] case; visiting [HIS/HER] foster home; monitoring visitation with [HIS/HER] birth parents*
	2. *Have been working since he first came into care*
		* 1. What does your role as a social worker on [CHILD]’s case entail?
				1. See [HIM/HER] twice a month
				2. Visit [HIM/HER] in the foster home 1x a month
				3. Supervise visits 1x a month
				4. Originally trying to achieve reunification
			2. Do you visit foster homes?
3. When were you assigned to his case?
	1. *[DATE]*
4. What did you do to familiarize yourself with [CHILD]’s case?
	1. *Reviewed file, talked to previous SW*
5. Were you the first Social Worker assigned to his case?
	1. *No.*
		1. Follow-up: Do you know who the previous social workers were on [CHILD]’s case?
			1. *Initial social workers on case following [HIS/HER] removal.*
6. Do you know the petitioner, [PETITIONER]?
	1. *Yes.*
7. How do you know her?
	1. *Known her since [MONTH YEAR], when [CHILD] was placed with her. Started meeting when she became [CHILD]’s foster parent.*
8. Do you know [BIRTH MOTHER]?
	1. *Yes.*
9. Who is she?
	1. *[CHILD]’s birth mother.*
10. And how do you know her?
	1. *Through visitation with [CHILD]; the court system*

**[PETITIONER]’s Fitness as a Parent & Observations of [PETITIONER] with [CHILD]**

**Familiarity with [PETITIONER] and [CHILD]**

1. How old was [CHILD] when you were first assigned to [HIS/HER] case?
	1. *[AGE]*
2. Where was [HE/SHE] living when you first were assigned to [HIS/HER] case?
	1. *With [PETITIONER].*
3. And how old is [CHILD] now?
	1. *[AGE]*
4. Who else has [HE/SHE] lived with since you have been assigned to [HIS/HER] case?
	1. *No one but [PETITIONER].*
5. You mentioned that you visit [CHILD]’s foster home as part of your job. How often do you visit [PETITIONER]’s home?
	1. *About once a month.*
6. For how long have you been making monthly visits?
	1. *Since approximately [MONTH YEAR]*
7. What is the purpose of the monthly visits?
	1. *Make sure that the home is safe for the child, see the child away from [HIS/HER]* *foster parent, make sure the child is ok, see the interaction btwn child and FP, as well as other people in the home*
8. How do you go about scheduling the visits?
	1. *Reach her by email.*
9. Was [PETITIONER] easy to work with to schedule visits?
	1. *Very easy to work with*

**[PETITIONER]’s care for [CHILD]**

1. To your knowledge, how is [CHILD]’s physical health?
	1. *Excellent to my knowledge*
2. Who takes [CHILD] to all of [HIS/HER] doctor appointments and check-ups?
	1. *[PETITIONER].*
3. To your knowledge, is [CHILD] up-to-date on all of [HIS/HER] immunizations?
	1. *Yes*
4. How often does [CHILD] go to childcare?
	1. *2 days a week to daycare, 2 days a week to [SCHOOL] preschool program*
5. Who arranges [CHILD]’s childcare?
	1. *[PETITIONER]*

**Observations**

[SOCIAL WORKER], now let’s discuss your observations of [CHILD] and [PETITIONER].

1. [SOCIAL WORKER], how would you describe [CHILD]? (personality; physical appearance)
	1. *[CHILD] is an active, energetic and affectionate [AGE] year old [BOY/GIRL]. Very curious about things, and likes to see how things fit together. Gives hugs easily. Can be aggressive with other kids.*
2. Does [CHILD] have any special needs?
	1. *Speech was delayed; then evaluated, broader cognitive deficit*
3. Do you know if [PETITIONER] has done anything to address [CHILD]’s special needs?
	1. *Went through infants and toddlers’ programs – [COUNTY] to assess children if they have any special needs. Transitions from homes to school. Got an IEP and started to go to school since then. She has been at all meetings. Provided information to school.*
	2. *She sends [HIM/HER] to a school for special needs children 3x/week during the school year*
4. Does [CHILD] exhibit any behavioral problems?
	1. *Some aggression*
	2. What observations led you to believe [HE/SHE] has a behavioral problem?
		1. *Hitting other children or adults*
5. Since you were first assigned to [CHILD]’s case, have you noticed any changes in [CHILD]?
	1. *[HIS/HER] motor skills have improved and [HE/SHE] has started talking more; more expressive; potty trained, much better behavior. Used to be much more aggressive, but has become much calmer, better social skills.*
	2. *Used to be easier to use physical actions, but used to hit. Very affectionate with [PETITIONER], easier to redirect and calmer.*
	3. Based on your observations, can you provide an example?
		1. *Impressed when I visited childcare last week – [HE/SHE] was in class and is really into being a good student.*
6. Have you observed [PETITIONER] and [CHILD] together?
	1. *Yes.*
7. How often have you observed them together?
	1. *(at least once a month for the last 2 years)*
	2. *For how long have you been observing them at least once a month?*
8. How would you describe the interaction between [PETITIONER] and [CHILD]?
	1. *They are very affectionate towards each other. [CHILD] likes to hug [PETITIONER],*

*[PETITIONER] also helps control [CHILD]’s rambunctious behavior.*

*Likes to crawl all over and hug her. [HE/SHE] will run off to do something, sometimes she has to correct him. Very cuddly.*

1. What does [CHILD] call her?
	1. Mommy.
2. How would you describe [PETITIONER]’s parenting skills?
	1. *Very calm with [HIM/HER], never seen her get upset, reassuring and loving.*
	2. *She does not yell, but can be firm. Put things out of the way, redirect.*
3. Are you aware of any efforts [PETITIONER] has made to integrate [CHILD] into her family?
	1. Yes
4. How would you describe [PETITIONER]’s efforts to integrate [CHILD] into her family?
	1. *[HIS/HER] life is very integrated into family. Her parents live with her, and so [HE/SHE] has built in grandparents. Niece and niece’s daughter are there, like a built in little sister.*
	2. *[PETITIONER]’s brother comes over, very much like an uncle. Goes everywhere with her. Just took her to a family wedding in [STATE]. Goes to church with her every week. Taken [HIM/HER] to Disneyworld, to the beach.*
	3. *She really includes [CHILD] in the family; takes [HIM/HER] on family trips (family reunions; DisneyWorld; the beach); she showers [HIM/HER] with gifts and love and provides [HIM/HER] with well-rounded activities; birthday parties at Chuck-E-Cheese; swimming lessons; gymnastics classes; church children’s chorus performances*
5. When you have observed [CHILD] in [PETITIONER]’s home, has [HE/SHE] been appropriately dressed and groomed?
	1. *Yes, she loves buying [HIM/HER] clothes, always dressed to the nines.*

**[PETITIONER]’s home**

1. Could you please describe [PETITIONER]’s home?
	1. *It is beautiful, large house in nice neighborhood in [CITY, STATE]. Immaculate, beautifully furnished.*
2. Does [CHILD] have [HIS/HER] own room there?
	1. *Yes.*
	2. What is it like?
		1. Nice room. Very nicely decorated.
3. And based on your visits to [PETITIONER]’ home, is it a safe environment for [CHILD]?
	1. *Yes.*
	2. *There were no safety concerns raised by the visits.*
	3. *Even when I noticed a broken smoke detector or electricity outlets without protectors, [PETITIONER] always fixed them immediately. She was receptive to advice.*
4. Does [CHILD] appear happy with [PETITIONER]?
	1. *Very. So comfortable, all [HIS/HER] different toys, has [HIS/HER] cousin who is more like a sister. Very affectionate with [PETITIONER] and the other people in the house.*

**Observations of [CHILD] with [PETITIONER]’s relatives:**

1. Have you observed [CHILD]’s interactions with other people in [PETITIONER]’s home?
	1. *Yes.*
		1. Who else have you observed [CHILD] interact with at [PETITIONER]’s home?
			1. *Her brother and her mother, with [HIS/HER] cousin who is [HIS/HER] age and lives in the home.*
				1. Follow-up: Any others?
		2. How would you describe those interactions?
			1. *Very comfortable like he is with his own family*
			2. *Calls her grandma.*
			3. *W/ niece like twins.*
2. Do you know if [PETITIONER] has any other extended family?
	1. *Yes, she does. There is a brother I have seen her with.*
3. Do you know if they are in the general area?
	1. *Yes.*
4. Have you observed interactions between [CHILD] and the extended family?
	1. *Yes.*
5. To your knowledge, what is the nature of the relationship between [CHILD] and [PETITIONER]’s extended family?
	1. *[HE/SHE] is her [SON/DAUGHTER], to him and to them. When her brother comes over, [CHILD] runs into his arms. He is like father and uncle figure to [HIM/HER].*
		1. And how do you know this?
			1. *Having seen them in the home and her description from bringing to him to different places.*

**Termination of Parental Rights; BM withholding consent is contrary to best interests of child**

**Removal**

1. [SOCIAL WORKER], based on your familiarity with [CHILD]’s case, what is your understanding of why [CHILD] is in foster care?
	1. *[BIRTH MOTHER] had left him with [PUTATIVE BIRTH FATHER.. Went to join job corps. High on [DRUG] under a bridge with [CHILD]. [BIRTH MOTHER] contacted and said she could not take [HIM/HER] bc she was in job corp. Reading the file.*
	2. *Initially removed from [BIRTH MOTHER] on [DATE], because of dv btwn her and her mother, placed with [PUTATIVE BIRTH FATHER], the putative father. When [BIRTH MOTHER] returned from jail, [CHILD] was placed with her again, but she arranged for [PUTATIVE BIRTH FATHER] to take care of [HIM/HER].*
	3. *[HE/SHE] was removed from [PUTATIVE BIRTH FATHER]’s care in [MONTH YEAR] when the police found [PUTATIVE BIRTH FATHER] high on [DRUG] and walking on a bridge with [CHILD].*
	4. *[PUTATIVE BIRTH FATHER] was unable to take care of [CHILD].*
	5. *His mother was unable to take care of [HIM/HER] at the time.*
		* 1. Who is [PUTATIVE BIRTH FATHER]?
				1. *He thought he was [CHILD]’s biological father*
				2. *He had been dating [CHILD]’s biological mother for awhile*
				3. *He took care of [CHILD] when [HE/SHE] was an infant*
			2. Where was [BIRTH MOTHER] when [CHILD] was removed?
				1. *She was in a jobs program, did not have stable housing*
			3. Do you know why [CHILD] was not put in her care?
				1. *She wasn’t in a position to take [HIM/HER], did not have housing*
			4. And do you know if [BIRTH MOTHER] has ever acted as [CHILD]’s primary caregiver?
				1. *Only for the first few weeks of [HIS/HER] life – then there was a CPS case because she got in a fight with her mother. [HE/SHE] was reunified with [PUTATIVE BIRTH FATHER].*
				2. *How do you know this?*

*From the file and her telling me.*

[Not for the truth of the matter – basis of her opinion and recommendation OR Party admission]

1. What was the permanency goal when you started working on the case?
	1. Concurrent goals – reunification with [BIRTH MOTHER] and custody with [PUTATIVE BIRTH FATHER]
2. Did you provide services for [BIRTH MOTHER] towards the goal of reunification?
	1. She was already hooked up with a CSA. My job was to find out who the case manager was and could she get more. She was not in therapy, but seeing a psychiatrist. Helped get her into therapy.
	2. Stayed in touch with case manager and therapist to see how she was doing.
3. Why (were these services important to meet [CHILD]’s needs?)
	1. She needed medication management. Needed therapy because she was having trouble just figuring out, getting through daily life. Had several fights during the time. Had a lot of trouble taking care of herself.
	2. Trouble taking care of herself?
		1. Got into at least one fight
		2. Homeless a lot of the time. Housing arrangements that fell through.
4. What services did you recommend towards reunification?
	1. Recommended parenting classes and therapy and medication management. Already getting but not consistent. Already in the court order. Think that she had the parenting class.
5. Did you ever recommend a goal change from reunification?
	1. Yes in [MONTH YEAR], recommended goal change to adoption
	2. Why did you recommend a different goal?
		1. [BIRTH MOTHER] was homeless for a while, took a long time to start parenting classes, got overwhelmed by sampling, short period of time after the [MONTH YEAR] hearing, seemed to be making progress. Began attending therapy regularly, visiting. Then end of [MONTH] things fell apart. Sometimes she called and said she was coming but never came. Basically missed or was an hour late. She wanted to go to IEP meeting but fell asleep. Maintained contact with case manager. Once case mgr stopped bringing her to visits, stopped coming. Became inconsistent with med mgmt. Made goal change in [MONTH YEAR].

Visits

1. Have you observed [CHILD] interact with [BIRTH MOTHER]?
	1. *Yes.*
		1. Under what circumstances have you observed them interacting?
			1. *Supervised Visitation*
2. What is your role during supervised visitation?
	1. *Normally just sit there, and try to not be too involved.*
3. Where does supervised visitation take place?
	1. *[LOCATION]*
4. How often do you monitor visitation between [CHILD] and [BIRTH MOTHER]?
	1. *Depends on stage of the case. Monitoring more when reunification is a possibility.*
5. And how are those visitations arranged?
	1. *Regular time. Because [BIRTH MOTHER] was inconsistent was required to call 2 hours ahead of time.*
	2. *Every week for an hour.*
6. When did you begin monitoring visitation between [BIRTH MOTHER] and [CHILD]?
	1. *When she took case in [MONTH YEAR].*
		1. Did [BIRTH MOTHER] show up for every appointment?
			1. *No.*
		2. How often did she visit?
			1. *Probably more than half*
		3. If she missed an appointment, did she call in advance to let you know?
			1. *Not always. Sometimes, called in advance. Sometimes called and said she would come but did not. Sometimes said she was on her way and came for last 5 minutes.*
		4. Did [BIRTH MOTHER] ever explain why she couldn’t make it to visitation?
			1. *Sometimes she said she did not feel well. Sometimes in a bad mood and did not want to expose [HIM/HER]. Sometimes said she did not have $ even though we were giving her money for transportation.*
7. How did [CHILD] react when [BIRTH MOTHER] did not show up for visitation?
	1. *I never felt that [HE/SHE] was expecting her that much. Got upset when [PUTATIVE BIRTH FATHER] did not show. But [HE/SHE] did not know who she was. It was obvious that [HE/SHE] saw [PUTATIVE BIRTH FATHER] as his parent.*
8. When [BIRTH MOTHER] showed up for visitation with [CHILD], did you observe them together?
	1. *Yes.*
9. How does [CHILD] behave when [HE/SHE] sees [BIRTH MOTHER]?
	1. *He has not seen her since [MONTH]. Times when it seemed like she was a stranger to [HIM/HER]. After she visited more consistently for awhile*
	2. *Complained that [HE/SHE] loved [PUTATIVE BIRTH FATHER] better.*
	3. *She complained that [HE/SHE] was showing signs of anger but I never saw that, if anything [HE/SHE] did not really know who she was*
	4. *[HE/SHE] is more indifferent to her.*
10. How would you describe their interactions?
	1. *They play together. Sometimes affectionate, at first [CHILD] did not recognize her, in later visits [HE/SHE] recognized her*
11. Based on your observations of [BIRTH MOTHER], how would you describe her parenting skills?
	1. *I felt like she does not have a full understanding of child development and where he should have been. Her comments would be age inappropriate, expected behaviors that would be better.*
	2. *Was on the phone a lot.*
	3. *Was bringing her boyfriend and he would play with [CHILD]*
12. [SOCIAL WORKER], when was the last time [BIRTH MOTHER] participated in a visitation session with [CHILD]?
	1. *[DATE]*
	2. Had she been visiting consistently up to that point?
		1. *No, she missed more than half of her visits before that time as well.*

Housing

1. [SOCIAL WORKER], during the time you have been on the case, what have been [BIRTH MOTHER]’s living arrangements?
	1. Lived in a shelter, lived with [BIRTH FATHER]’s brother, lived with her sister
	2. Had her own place for a while/has been in quite a few different places.
2. Do you know if [BIRTH MOTHER] has a stable living arrangement?
	1. *She is living with her sister, last time I heard. For the last few months.*

Mental Illness

1. Do you know if [BIRTH MOTHER] has a history of mental illness?
	1. *Yes.*
2. Please explain**.**
	1. *First time I met her, she said she had [DISORDERS].*
	2. *What if anything did she tell you about her treatment?*
	3. *[BIRTH MOTHER] has told that she has been diagnosed with [DISORDERS].*
		1. (*See* [DATE]FACES contact note)
	4. *She told me she had been seeing a therapist at times, but because of missing multiple appointments, the visits were discontinued. I’ve encouraged her to see a psychiatrist for a medication evaluation and to continue seek therapy which she did not do*
		1. *That she had been diagnosed as […] when she was young.*
		2. *Also […].*
		3. *Said it was up to her to keep those disorders in check.*
3. [SOCIAL WORKER], did [BIRTH MOTHER] ever tell you if she taking her medications for her mental health disorders?
	1. *She mentioned one time that she didn’t like taking her medications because they made her feel like a zombie.*
	2. *She does not think that they work properly*
	3. *That she hadn’t taken them since she was [AGE].*
		1. [Note: this is mentioned in the [DATE] FACES report.]
4. During the time you have been on the case, to your knowledge, has she consistently taken medication?
	1. How do you know?
		1. She told me at the beginning.
		2. She never told me that she was not going.
5. Are you aware of any history of violence [BIRTH MOTHER] might have?
	1. *Had some altercations. Dismissed from job corps from an altercation. Another altercation that caused her to be dismissed from a shelter.*
	2. *Has engaged in DV with her mother*
	3. *Was charged with assault but not prosecuted*
	4. *Has missed visits because of assault charges*

15. How would you describe her ability to take care of herself?

* 1. *Not able to take care of herself very well. Has trouble managing money, having a place to stay. Was living off SSI. Used the money for something else. Was not taking care of herself well. Have to be able to take care of self to take care of child.*

Unknown father

1. [SOCIAL WORKER], is [CHILD]’s birth father known?
	1. *There is a name, but have never met him*
	2. What was the name*?*
		1. *[ACTUAL BIRTH FATHER]]*
		2. How did you learn this name?
			1. *[BIRTH MOTHER] stated it in court*
2. Has [ACTUAL BIRTH FATHER] ever made any attempts to contact you in regard to [CHILD]?
	1. *No.*
3. Has anyone else contacted you or CFSA claiming to be [CHILD]’s biological father?
	1. *No.*
4. Has anyone else contacted you or CFSA seeking visitation with [CHILD] claiming to be [HIS/HER] biological father?
	1. *No.*
		1. Or to provide financial support?
		2. Send cards or birthday or holiday gifts?

**Recommendations:**

1. [SOCIAL WORKER], based on your interactions and observations in this case, what is your recommendation regarding the [CHILD]’s permanency goal at this time?
	1. *Support adoption with [PETITIONER]*
		1. Follow-up: Why?
			1. *(Why don’t you recommend reunification?) Been with mother for 2 weeks and with foster mother for two years. Only other home [HE/SHE] has known is with [PUTATIVE BIRTH FATHER]. But never had a home with [HIS/HER] mom. Has not seen her since [MONTH]. Thinks of [PETITIONER] as [HIS/HER] mother.*
2. Why do you support [PETITIONER]’s petition for adoption of [CHILD]?
	1. *Yes. Only home [HE/SHE] has ever known. Provides everything [HE/SHE] could need. Community and love that [HE/SHE] needs. Helps [HIM/HER] with school, great parent.*
3. Do you have any reservations about this recommendation*?*
	1. *None.*