

OCR CORE COMPETENCIES

perm hearings: return home

mel jensen | 8th judicial
mel@jensendavislaw.com

who's here?

return home analysis

19-2-702(3)

should youth be
returned home

19-3-702(4)(a)

return home today?

19-3-702(4)(e)

substantial probability
return home
6 months?

19-3-702(4)(b)(1)

compelling reasons
other goals not BIC

but how do you
know?



safety assessment



checklists/worksheets

<https://coloradochildrep.org/gal-safety-assessment-webinar/>

review dhs risk
statements

cultural considerations

could you write a
return home/
transition plan today?


cultural considerations

ICWA higher standard: serious physical/ emotional
damage (by cce)

protections for parents covered by ada - 24-34-805

language and cultural interpreters

case consultants and community resources



investigating substantial probability

GRID checklist for pph
parents
schools
youth's providers
dhs caseworker
parent's providers

the child



"what would a safe return home look like"

"if you had a magic wand"

"what changes have you seen in mom/dad"

"what helps you feel safe?"

"do you want to talk to the judge?"





before the hearing

in camera?

closed courtroom?

off docket?

object to magistrate jdx?

transportation to hearing?

supports?





making a record



youth's position first

substantial probability:
parenting time
child's position
progress in treatment

compelling reasons:
substantial probability
child attachment
unaddressed barriers
ada considerations



on requesting contested hearing

concurrent goals?

is the action subject to EPP?

are you also filing return home motion?

reasonable efforts?

time to cure?



is record of objection sufficient?





THANK YOU!

you have questions. what are they?