

IN THE JUVENILE COURT FOR _____ COUNTY, TENNESSEE

STATE OF TENNESSEE)
) CHILD/CHILDREN UNDER
) THE AGE OF EIGHTEEN
IN THE MATTER OF)
) DOCKET NO: _____
_____)

**MOTION TO FIND LACK OF REASONABLE EFFORTS DUE TO LACK OF
ASSIGNED DCS WORKER AND DUE TO LACK OF COORDINATED VISITATION**

Comes _____ and hereby moves the court to find lack of reasonable efforts have been made by the Department of Children’s Services by failing to coordinate reasonable visitation between the children and the parents.

In support thereof Movant would show [*List facts to support request, e.g., hearing has not been held in compliance with the time allowed by law.*]

1. On the 18th day of April, 2017, the above children were removed from the custody of the parents and placed into foster care.
2. While initially DCS Case Manager was assigned to assist this family, that individual has since left the position of Case Manager.
3. The minor child, _____, was one month old at the time of removal.
4. During a Child and Family Team meeting held on the 22nd day of May, 2017, the parents reported they had not seen their children since the date of removal (over two months) and were told they would have a four hour visit every other weekend.
5. Since that time (a month and a half ago) there has been only one such visit.
6. This lack of reasonable efforts by the Department is denying the newborn infant his critically important bonding opportunities with his parents.
7. The Preliminary Order entered May 11, 2017, lodged May 1, 2017 for the hearing held on the 26th day of April 2017 sets the Adjudication for June 12, 2017 and also states, “DCS should present the permanency plan for ratification at the Adjudicatory hearing.”

8. This lack of reasonable efforts by the Department is denying the parents the guidance and support they need to re-unify with their children.

WHEREFORE, PREMISES CONSIDERED, PETITIONER REQUESTS:

1. For the reasons stated above, that this Court find that the State of Tennessee, Department of Children's Services (DCS) has failed to make reasonable efforts on this matter to reunify the family;
2. That this come before the court on the 24th day of July, 2017 for a hearing on this motion;
3. That generous make-up visits be awarded to these parents with DCS paying for any additional cost(s) incurred; and
4. Any and all just and proper relief.

Respectfully submitted,

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of this Motion was forwarded by U.S. Mail, postage prepaid, to the following persons on this the _____ day of _____, _____:

[List the names and addresses of each attorney/person/party noticed.]