

# **Columbiana County Family and Children First**



Family and Children First Council  
of Columbiana County

## **Service Coordination Mechanism April 2018**

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## **An Overview/description of the purpose of Service Coordination Mechanism**

The Columbiana County Family and Children First Council (FCFC) is committed to serving children and families and to meeting the mandates of Section 121.37 and 38 of the Ohio Revised Code. Service Coordination is a process of service planning and system collaboration that provides individualized services and supports to families who have needs across multiple systems. The services should be child-centered and family-focused, with the strengths and needs of the child and family guiding the types of services to be provided.

The values that the Service Coordination Mechanism must integrate into the plan are:

- Services are delivered using a family-centered approach
- Services are responsive to the cultural, racial and ethnic characteristics of the population being served
- Service outcomes are evaluated
- Available funding resources are fully utilized or integrated
- Home and community supports are utilized as needed
- Specialized treatment for difficult-to-serve populations and evidence based-based treatment services are encouraged
- Duplicative or competing efforts among agencies are reduced or eliminated
- Families and youth are fully involved in decision-making and are provided with family advocacy ad support options

The Mission of Columbiana County FCFC is to:

Promote a community that helps all children fulfill their potential. We recognize and build upon those elements that make a healthy environment for all children; a nurturing, stable, and safe environment in which a child's development needs are met

The membership of the Columbiana County FCFC is diverse. The mandated membership is comprised of the following:

- 3 Parent representatives
- City of Salem
- Columbiana County Department of Jobs and Family Services
- Columbiana County Mental Health & Recovery Services Board
- Columbiana County Educational Services Center
- Columbiana County Board of Developmental Disabilities
- Columbiana County Health Department
- Columbiana County Juvenile Court
- Columbiana County Commissioners
- Columbiana County Help Me Grow
- Department of Youth Services
- City of Salem Health Commission District
- Community Action Agency of Columbiana County
- East Liverpool Schools
- The Counseling Center
- Family Recovery Center

Additional membership includes 11 school districts and organizations/agencies in our community who have an interest in supporting the mission of the Council. These local agencies, work together to improve the lives of children in our community.

The Service Coordination mechanisms process provides for a development of a system of care that ensures a seamless transition from Birth to 21 for educational and socio-emotional resources. Any Columbiana County child or youth and family who are experiencing challenges and may put the youth at risk for or in need of multi-system involvement or out-of-home placement can be referred to Service Coordination. Service coordination is a collaborative, coordinated, cross-system team-based planning processes implemented to address the needs of youth and families. Children served may or may not be dependent, abused, neglected, or unruly. This process serves as a way to assist agencies, programs, and service providers to better collaborate to meet the complex and unmet needs by building upon the strengths of the current services that are serving our families; assist in identifying gaps in services, and proposes new services or strategies to meet the needs of families.

The key principles within a system of care are:

- Broad array of services/supports available
- Individual Plan
- Least restrictive setting
- Coordinated at both the system and service level
- Family-driven, youth-guided
- Emphasize early identification and early intervention

These key principles are embedded in the service coordination mechanism which provides a continuum of care for families. Referral and information, Family Support Team Meetings, Case Reviews, Service Coordination and Hi-Fidelity Wraparound are the identified processes that we always consider when finding the best “fit” for child and family needs in the least restrictive environment which will meet the child’s needs.

Emphasis is placed on developing an effective plan for families with a child who is alleged to be an unruly child, in order to divert the child from the Juvenile Court system. Some of these youth are involved in the Diversion Program at Juvenile Court. Early identification and intervention are critical factors in preventing a child from becoming further involved in the Juvenile Court system. Juvenile court staff make referrals to FCFC Service Coordination based on the needs of the youth and family in order to provide them with alternative options in lieu of formal charges and involvement with probation and the Juvenile Court.

Youth that are involved with the Juvenile Court diversion program complete developed terms by the Diversion officer; may include things such as Community Service, involvement with mental health counseling, and/or participation with FCFC Service Coordination.

Collaboration between Columbiana County Children Services and Columbiana County schools is also where emphasis is placed in order to work with families with suspected and/or substantiated abuse, neglect, or dependency issues. Schools collaborate with FCFC with referrals for youth with truancy and/or unruly issues exhibited in the local school districts.

### **Ohio Part C Early Intervention**

Referrals can be made by calling Columbiana County’s Part C provider CC Board of Developmental Disabilities at 330-424-7787 or by contacting the centralized, statewide Central Coordination at 800-755-4769 or [www.ohioearlyintervention.org/referral](http://www.ohioearlyintervention.org/referral). Referrals commonly come from parents/guardians, hospitals, physicians, social service agencies, or children services. All referrals for Part C services are made to and processed in accordance to state rules that are governed by Ohio Department of health in partnership with Ohio Department of Developmental Disabilities.

Columbiana County FCFC partners/collaborates with CC Board of Developmental Disabilities for them to provide the HMG; home visiting services; along with the Early Intervention Service Coordination process. The Service Coordination mechanism ensures collaboration with EI Service Coordination by providing oversight through attending staff meetings and by collaborating and participating in the development of the Inter-Agency agreement for transition services from Early Intervention and Home visiting services to preschool to Kindergarten. There is a transition meeting held for participants that are leaving the Early Intervention Program to ensure seamless transition of services as needed by the youth and family. The EI Service Coordinator or the HMG Home visitor attends these meetings; along with any other agency representative that the family wants at the meeting. The Early Intervention service coordinator and program manager attend the Early Childhood Coordinating committee meetings to ensure they are up to date on all services, programs, and training opportunities for the youth and family they are serving. FCFC not only provides fiscal oversight but has frequent contacts with Help Me Grow Program Manager regarding the youth and families that are receiving Early Intervention services. EI fiscal monies are spent on staff costs and outreach information to local doctors offices, hospitals etc. Families also have access to Family Support Services money through CCBDD for things as respite and adaptive equipment that will benefit the needs of youth and family. Fiscal requests are reviewed, discussed, and finalized by the FCFC Administrative agent's Fiscal officer to ensure quality assurances of money spent.

### **Managing Levels of Coordination Across a Continuum**

#### **Level I,**

Level 1 Families: Typically developing youth. These families will be referred to FCFC for information and Referrals. They may need information about how to connect to local services/programs that is least restrictive to meet the unmet need of the family; i.e.; food pantry, clothing drive

#### **Level II,**

Level II Families: Typically developing youth that experiencing a crisis; life adjustment, or educational issues. These families are identified through schools, mental health agencies, law enforcement, or other service agencies throughout Columbiana County. These youth are requiring individualized attention from one or more systems represented on the Council for the youth's functioning to improve. A Family Support Team Meeting or Case Review may be the required process to address issues with level II families. Intervention can be a range of Information/Referral to Case management (CPST) services.

#### **Level III,**

Level III Families: Youth requiring individualized assistance from two or more systems represented on the Council. For the youth's functioning to improve, the family requires case management and Intersystem Service Coordination; i.e.; Hi-Fidelity Wraparound, Home based therapy, or a combination of more intensive processes/services.

### **Community Awareness of Service Coordination Process in Columbiana County**

Families and service providers are educated about FCFC Service Coordination through community outreach to schools, agencies, public events, and newspaper articles. Brochures, talks to community groups, and cross-system training are utilized on a regular basis to inform the community about the FCFC Service Coordination services available to youth and families. FCFC meetings are held monthly and offer a valuable forum for disseminating information about Service Coordination. There are numerous agencies represented at the table at both Mandated and General membership meetings in order to provide up-to-date information and resources to agency representatives. These agencies include WIC, Head Start, Health Department; among other youth

and child service agencies. Meeting dates are published in the local newspapers and are open to the general public. Three Parent Representatives participate in FCFC meetings and help inform families in the community about Service Coordination initiatives which are available.

Families and service providers can also access information about FCFC through our social media outposts. We utilize Facebook page and website that have information on how to contact FCFC Columbiana County to get information on trainings, contact info, and updated resource information. Columbiana County FCFC provides a "Year in review" with our Stakeholders and area legislatures in order to update them to the process and numerous collaborations that benefit youth and families in Columbiana County. This will highlight the importance of continued access to FCFC service coordination and collaboration, assessment, and identifying of services in gaps thereof that youth and families benefit.

### **Referral Process to Service Coordination**

Referring parties complete an FCFC Referral Form, and the referring party will have the family sign a Release of Information form to protect the confidentiality of all personal family information disclosed during the referral process, during Service Coordination meetings. The referral and consent forms can be mailed, faxed, or delivered to the FCFC office at: 38720 Saltwell Rd., Lisbon, OH 44432. Families seeking information/referral or service coordination may contact the FCFC office by calling (330) 424-9591 for assistance in completing the forms.

When a referral is received, the information is reviewed and additional information may be gathered from the family or referral agent as needed. The FCFC Coordinator reviews the referrals and determines the process that is needed to address youth or families need; i.e.; information/referral, Family Support Team meeting, Case Review, or Wrap around services. If a family chooses to participate in FCFC Service Coordination program, their level of need and interest guide the selection of the intervention. Information about what Service Coordination can offer, as well as all of the appropriate community options and supports are discussed with families before a service is initiated. The least intrusive response available to meet the child/family's needs is given priority in all cases. The Information/Referral, Family Support Team Meetings, Case Reviews, and WrapAround are the chosen service coordination processes to be used to bridge the connection of youth and families needs to the chosen interventions.

A detailed description of each level of care is offered below:

**Information/Referral** - Families are invited to contact FCFC for assistance in locating needed information and services for their children. The referral process is outlined in (Referral Process to Service Coordination - pg 5) The families that are not eligible for FCFC Services are provided and/or linked to other appropriate services.

**Family Support Team Meetings (FSTM)** - Team approach to helping families experiencing a crisis or adjustment difficulty within the family. Families are able to reach out to FCFC Service Coordination through referrals from various agencies and schools throughout Columbiana County.

**Case Review** - Team approach to helping families facing out of home placements, reunifications, transition age youth out of foster system, and cases that are presenting with high needs that have providers have been unable to make changes in the risk level of youth and family.

**FCFC Service Coordination** - A service planning, broad-based, neutrally-positioned, youth and family-driven, cross-system (team) planning process by which previously identified and existing resources and supports are coordinated to determine the least restrictive plan of success for youth with complex needs.

**High Fidelity Wraparound**– A specific evidenced-based intensive planning facilitation process, utilizing a comprehensive team to develop a uniquely designed helping plan based on the youth and families unmet needs, and is inclusive of uniquely-designed resources linked to youth and family strengths.

FCFC Service Coordination and High Fidelity Wraparound closely mirror one another and have parallel operations. Service Coordination is primarily designed to address the dosage, sequencing, coordination, and alignment of traditional services and address system barriers. Wraparound is primarily designed to address youth/family needs that remain unmet and to develop a plan based on the youth/family culture, strengths, and natural supports. Wraparound families tend to have greater need, higher risk scores, and meet more frequently. They may have longer lengths of stay in service.

When a referral is made to Service Coordination and families decide not to participate, they are given information, referrals to other community resources, and brief interventions if desired by the family.

Timeline goals for Service Coordination referral process are as follows:

- Timeline begin at the date child is referred to FCFC. The date of referral is defined as the date of the FCFC referral form or is submitted or completed. The response to, and outcome is documented in the child's record/form.
- The referral source is contact within 5 days after the referral is received; engagement with the family begins with 10 days of referral. The facilitator works with family when initiating the original engagement meeting and later to review and assist family in inviting support persons to the meetings.

Based on the provided "risk behaviors" identified on the referral form; they are scored and determined if Level I, II, or III (identified on page 3 & 4) interventions need to be presented to families for participation. FCFC Coordinator will provide information and referrals as needed, schedule Family Support Team meetings, or Case Reviews based on referral information; or assign to a Wraparound facilitator.

**Level 1:** Referral will be made to FCFC Coordinator and contact will be made with family to provide information or provide referrals to programs/services a family may need; i.e.; food pantry, clothing banks

**Level 11:** Referral will be made to FCFC Coordinator and reviewed to determine what process should be followed: Families will be presented with options regarding meeting times, dates, and places for Family Support Team meetings which is the least restrictive process. Families will be made aware that a support person, advocate, and/or mentor of families choosing can participate in these meetings. Families have a voice in the development of a plan, recording the plan, and responsibility for assignment to be completed, and tracking progress toward goals of the plan.

In Columbiana County, Case Reviews are to be scheduled prior to any non-emergency out-of-home placement for all multi-need children, or within 10 days of a placement for emergency placements of multi-need children, and when youth are transitioning back into the community following out-of-home placements. Case reviews are also scheduled for multi-need youth when "all identified services/programs" have been attempted and youth and family still experiencing "risky" behaviors or areas of concern. These meetings encompass a team which has a representative from CC Department of Jobs and Family Services; Children Services division, CC Board of Developmental Disabilities, CC Juvenile Court, and CC Educational Services Center; along with FCFC

Coordinator who is the facilitator of the meeting. Additional representation at the table is based on the individual needs or preferences of the family; i.e., mental health providers, CPST workers, TIP facilitator, individual school representatives, Parent Peer Support, or any support person family wants to participate. These meetings are held twice monthly on predetermined days in order to have full participation of the identified team or on emergency as needed basis. A one-time plan is developed with the families participation and voice in these meetings around referrals for more intensive home based services, out-of-home placement, or recommendations to the juvenile court, where final decisions regarding the child's case is determined. FCFC coordinator follows up with families for 6 months following these meetings to ensure plan is being followed and assess any further gaps in services/and or programs need to be addressed with the systems.

**Level 111:** A referral is received for Service Coordination or Hi-Fidelity Wraparound. The "risk" score will be assessed and a facilitator will be assigned for either Service Coordination or Hi-Fidelity Wraparound. The definition to clarify the difference between FCFC Service Coordination or Hi-Fidelity Wraparound is important for outcomes and data clarification.

### **Monitor Progress and Tracking Outcomes**

The procedure for monitoring the progress and tracking the outcomes of children who receive a Service Coordination Plan will be followed through the use of Web based system. Each referral will be entered into the system and assigned a facilitator. The facilitators will utilize the system by providing all the necessary tracking items identified by Ohio Family & Children First Council. Reports will be generated every 90 days to allow the team and FCFC Coordinator to review and monitor the progress.

Out of home placement information for children receiving Service Coordination is reported to the county FCFC on a monthly basis. Data and information collected through the monitoring and tracking system includes date of placement, facility, and anticipated release date. Children and youth who have received service coordination and returned home to families/caretakers in the county are referred for a Case Review to ensure that needed services and supports will be in placement for those children and families. Home Choice will be made available to the family if desired and the eligibility criteria are met.

### **Assessments**

In Columbiana County; through Service Coordination all families that are participating in Service Coordination that includes the development of Individualized Family Service Plan (IFSP); the assessment tool Child and Adolescent Needs and Strengths Assessment (CANS) will be utilized. This assessment tool can assist the team in proper level of coordination through that CANS that will give insight on the family's level of need and identify progress family is making towards meeting the goals. The CANS will be administered upon completion of the Intake (Discovery, Needs, and Strengths) documentation in order to assess a baseline level of need and 90 days thereafter; until case is closed. If a youth/family has been recently assessed within the last 30 days with a formal assessment tool, those results can be obtained for assistance in determining a youth/family's level of need/care. The CANS tool measures a variety of life domains. Additionally, the tool can be used to identify priority planning areas of need that can be used in the development of the Individualized Family Service Plan (IFSO) or Plan of Care (POC).

**Timeline goals** for Service Coordination ongoing process are as follows;

## **Phase I - Engagement and Team Preparation**

- WrapAround: The Engagement meeting or first Wraparound meeting occurs within ½ weeks upon a facilitator receiving the referral. The days are pending availability of the family. Written documentation of the Wraparound services will be provided and reviewed with the family, and placed into the child's file by the assigned Service Coordinator
- The Wraparound plan identifies additional individual timelines for the completion of interventions and goals which are unique to each family; at this time FCFC service coordinators meet with family to make any referrals to formal or informal resources family is interested. All releases of information are completed at this time.
  - A release of information (ROI) is signed by parents/guardians, which includes a statement about data being entered into a statewide electronic health record whenever they are referred to FCFC. Additional providers are added as needed and family may revoke the release at any time with a written notification.
  - All hard copy documents containing confidential information are kept in secure cabinet with facilitator having the only access. All electronic records are maintained in a HIPAA compliant manner.
- A family that is participating in FCFC Service Coordination or Early Intervention HMG services is offered an opportunity to work with a Parent Peer Mentor through NAMI Parent Advocacy Connection. Services are explained and referral is made the Regional director to assign a Parent Peer Support Person as they are available through the program
- During this phase issues around safety are reviewed that meets the family needs; a separate Crisis plan is also established to ensure families is aware of and has plan in moments of crisis.
- A facilitator will meet with family to develop the strengths, needs, and cultural discovery of the family. Facilitator will complete a summary document, review with family, and have family sign-off that they reviewed and agree with discovery. Strengths and needs are updated at every Wrap around family meeting and added as needed so that the Discovery document is work in progress.
  - Each person (including referral source) will be asked to participate in the development of strengths, needs, and discovery process. The facilitator will provide a tool - questions that cover different life domains in order to identify strengths and needs of youth and family. This will assist in a well-rounded, in depth assessment of strengths and needs; and thus assist the facilitator in completion of the CANS tool. The facilitator must be trained and certified to be a CANS user.
  - The combination of the FCFC risk/strength screening tool, CANS and the strengths, needs, and cultural discovery process assists in developing a comprehensive picture of the youth and family strengths and needs.
- Facilitator's, along with family members, will begin to identify potential team members; process and clarify roles and responsibilities. They will also review meeting logistics; how, where, and when and by whom meetings are scheduled and how team members are contacted per family choice and voice.

## **Phase II - Initial Plan Development**

- During Wraparound meetings (first one about 30 days following Engagement) are scheduled with the family and Wraparound team based upon the individual needs of the family. The IFSP will contain goals to meet the unmet needs of the family. These goals will be measured and outcomes tracked through the use of the CANS and the additional assessments that are provided in the Web-based program utilized in Columbiana County. A team vision and mission are developed at this stage; as well as ground rules for meetings.
- Issues of safety are continually reviewed to meet family needs. Based on the needs a separate Crisis plan is reviewed and re-developed with family to address the prioritized needs of the family. These plans will be developed to assist family in maintaining the safety of the youth and family in the home

and community. A crisis plan will be identified to include who to contact and steps to follow if in crisis. These plans are reviewed monthly or as needed and updated if deemed necessary for the safety of the child, family, and/or community.

- Unmet needs will be developed to work towards development of goals; be able to look at strategies and goals with the family in order to achieve positive outcomes.
  - Respite for high-risk families will be made available to allow for crisis intervention to avoid long-term out of home placements as resources are available through County agencies
  - A 24-hour emergency crisis worker will be available to Wraparound families to provide them with assistance in handling crisis situations. The crisis worker can be contacted through HelpNetwork
- Families may initiate additional meetings and invite support persons at any time
  - It is important to recognize that the family may initiate meetings to develop or review the family's plan of care by contacting their Family facilitator at any time. The facilitator will take the necessary steps to plan arrange the meeting. Family is made aware routinely that the may invite a parent mentor or any other support person of the family at any point.
  - The family and Family team facilitator will work collaboratively to schedule meeting and facilitator will provide invitation to all members the family wants on the team. This could be informal supports; such as friends to formal supports from agencies, or school representatives.

### **Phase III - Implementation**

- During this phase, the plan of care is implemented and the family team meetings regularly. Progress, satisfaction, and successes are continually reviewed at family team meetings. Changes are made to the plan as needed. Facilitator will address issues of team cohesiveness and trust during this phase.
- The Facilitator maintains contact with the family in between meetings. The initial Wraparound plan is implemented and the needs and achieving goals are continually reviewed with the family to ensure services are responsive to family need and are provided in the home, school, and/or community. Changes are continually made to the plan as needed. Activities in this phase are repeated until the team's mission is achieved.
- The CANS Assessment tool will be administered every 90 days during this phase.

### **Phase IV - Transition**

- Wraparound transition is the final phase of WrapAround, which begins when sufficient supports are in place and the priority goals have been achieved. During this phase plans are made for a purposeful transition out of formal Wraparound to a mix of formal and/or natural supports in the community, a crisis/safety plan is updated. Wraparound transition includes follow up with family and may include follow up with team members after formal team meetings have concluded. Families complete a survey to provide feedback on participation in Wraparound
- Facilitator and family will create a post-transition crisis management plan to meet the ongoing needs of family following transition out of Wrap Around or Service Coordination.
- Within 30 days of program closure, the FCFC Service Coordinators complete final documentation of services, and the inactive cases files are forwarded to the FCFC office

### **Fiscal**

Funding decisions are made monthly at the FCFC Mandated members meeting. The monthly expense report is provided by the Fiscal Officer of the Administrative Agent - Columbiana County Educational Service Center. It is reviewed and voted on by Council members at each meeting. The report contains each funding source; the

expenses and revenues for the month to provide Council members with opportunity to review spending through FCFC Service Coordination.

Service Coordination funding comes from a few different sources; Family Centered Services and Supports (FCSS), Collaborative grant through Strong Families Safe Communities (only as applied for and awarded yearly); Columbiana County Juvenile Court collaboration (as determined on a yearly basis). Due to the flexibility of FCSS funding it can be utilized for families for items other than service coordination (see FCSS allowable items) based on need and decision made by FCFC Coordinator. These funds are blended to provide coordination and support for Service Coordination. FCSS funding resources are allocated to other services upon review of meeting the service coordination need that are provided on a monthly basis.

FCFC of Columbiana County has an Emergency flexible fund (EFF) to be utilized if all other revenue resources are exhausted for items such as but not limited to; transportation, housing, utilities, and health issues. Youth and families must be multi-system involved in agencies in the County. These monies are being provided collaboratively with agencies in the Columbiana County that can and want to participate in this Flexible Fund. A request is made and the EFF policy and procedures are followed. These funds will provide additional support to the FCSS funding source for community-based, preventative, and family-centered services. An EFF oversight committee will review the requests monthly to monitor the fiscal compliance to the developed policy. This committee will consist of a designated agency representative from each fiscal provider that has contributed to the fund.

### **Quality Assure of the County Service Coordination Plan**

The Service Coordination Plan will be reviewed annually by the FCFC Service Coordination Committee, and provided to the FCFC Mandated members yearly for additional review and modifications that need to be made regarding implementation and administration of the mechanism. All revisions or updates will be made as requested by Ohio Family & Children First Council, or when significant changes occurs in the provision of Service Coordination to youth and families.

# Dispute Resolution Process

[ORC 121.37(C)(9)]

Each family referred to the Columbiana County Service Coordination Team shall be informed of and receive a copy of the Dispute Resolution Process by the Columbiana County Service Coordination Team facilitator upon receipt of the Notice of Referral and prior to the first meeting of the team. The following are essential components of the Dispute Resolution Process:

1. Families are encouraged to fully participate in the process and may be represented by a person of their choosing throughout the process.
2. All necessary services to insure the health and safety needs of the child and family shall be provided throughout the process.
3. Any party to the Individualized Family Service Coordination Plan, especially including the child and family served, may disagree with the specific services of the plan.
4. The Dispute Resolution Process includes conflicts of both an emergency and non-emergency nature.
5. The party in disagreement with the plan shall notify the Chair of the Columbiana County Family and Children First Council and will provide written rationale for the disagreement no later than ten (10) days after the plan has been developed.
6. The Chair of the Family and Children First Council will notify and convene the Executive Committee within ten (10) days of receipt of the notice. The disputing party shall receive notice of the committee meeting no later than three (3) days before the meeting date and may attend the meeting with or without the family's advocate.
7. The Executive Committee will provide written notification to the disputing party, the Chair of the Family and Children First Council and to the Chair of the Columbiana County Service Coordination Team of its decision within ten (10) days after the Committee meeting.
8. The disputing party may disagree with the above decision and may wish to continue the Dispute Resolution Process. In such an instance, the disputing party will provide written rationale for the disagreement no later than seven (7) days of receipt of the decision of the Executive Committee to the Juvenile Judge.
9. The FCFC shall provide an interagency assessment and treatment information to the court.  
(Recommended by guidance from Ohio Family and Children First)
10. All timelines may be extended by mutual agreement between the disputing party and the Chair of the Family and Children First Council. Earnest efforts will be made to resolve all disagreements within 60 days.
11. The Juvenile Court is the final arbitrator of disputes involving specific services of the Individualized Family Service Coordination Plan.

Families involved with Help Me Grow may use the above Dispute Resolution Process to seek a resolution at the Help Me Grow Service Coordination level prior to engaging in the appropriate Ohio regulatory agency's Dispute Resolution Process. When a dispute arises that cannot be resolved at the local level, the Dispute Resolution Process via the appropriate Ohio regulatory agency should be utilized.

*Notification: The Columbiana County Service Coordination Team Dispute Resolution Process does not replace the existing dispute resolution procedures for specific agency concerns including Help Me Grow*