



MEMORANDUM

TO: Local Department of Social Services (LDSS) Directors;
LDSS Assistant Directors of Services; All LDSS services staff; LDSS
Assistant Directors of LGA; All Finance Staff; All SSA Staff

FROM: Rafael López, Secretary *Rafael Lopez*
Carnitra White, Principal Deputy Secretary *Carnitra White*
Dr. Alger Studstill, Jr., Executive Director *Alger Studstill Jr.*
Social Services Administration

DATE: October 22, 2025

SUBJECT: Immediate Action Required – Directive on the Use of Unlicensed
Settings

Purpose

The purpose of this memorandum is to clarify that the Maryland Department of Human Services (DHS) will not facilitate the use of hotels or other unlicensed settings for youth experiencing out-of-home care. This memorandum directs all Local Departments of Social Services (LDSS) to immediately stop facilitating stays in unlicensed settings for youth experiencing out-of-home care as of October 22, 2025, and to move all youth currently in a hotel stay to a placement appropriate to their needs no later than November 24, 2025. Placements appropriate to a youth's needs are subject to the DHS placement hierarchy, and include:

1. Kinship caregiver's home;
2. Licensed placements; and
3. Trial home visit.

Hotels, motels, office buildings, and other unlicensed settings are not in a youth's best interest and must be discontinued immediately. Youth experiencing stays in unlicensed settings is inconsistent with state and federal law, and departmental standards and policies.

This Memorandum immediately supersedes and replaces in the relevant parts SSA-CW #25-01, effective March 3, 2025. We will update SSA-CW #25-01 at the earliest opportunity.

Effective Immediately

LDSS¹ are prohibited from facilitating a stay in a placement that is not appropriate for the needs of a Child in Need of Assistance (CINA), a youth under LDSS guardianship, or youth under a shelter care order, who is in DHS care and custody, including all LDSS. All placement decisions must align with permanency planning principles and ensure that youth are placed in the least restrictive, most family-like setting appropriate to their needs.

Placements that are not appropriate to the needs of a child in the care and custody of DHS include unlicensed settings. Unlicensed settings include:

1. Hotels, motels, or short-term rentals (including AirBnB); and
2. Office buildings or other nonresidential environments.

LDSS with youth currently experiencing a hotel stay must coordinate with the SSA Placement Unit to identify and secure placement(s) appropriate to the youth's needs. All placement decisions must comply with DHS's placement hierarchy, prioritizing:

1. **Kinship Care** – relatives and family connections by blood or by choice;
2. **LDSS-Licensed Foster Homes** – approved LDSS foster families;
3. **Private Treatment Foster Care (TFC) Homes** – contracted Child Placement Agency (CPA) foster homes;
4. **Congregate Care Settings** – including group homes, diagnostic programs, and shelter placements; and
5. **Independent Living Programs or Housing Vouchers** – Family Unification Program vouchers, Foster Youth to Independence housing vouchers, and New Futures Subsidy Program.
6. **Trial Home Visit²** – child resides with parents or legal guardian.

Required Actions For Youth Currently Experiencing Hotel Stay

LDSS must take the following steps immediately:

1. **Document Current Youth Experiencing Hotel Stays in CJAMs**
 - o As required in [SSA-CW #25-01](#), document each child's current status, barriers to placement, including details of repeated residential care

¹ Human Services Article, § 3-201 (a), § 3-402, and § 4-202.

² [SSA Policy #13-02 Case Planning/Concurrent Permanent Planning](#), effective October 15, 2012, pp. 5-6, on when to utilize a trial home visit.

provider and child placement agency refusals, and projected discharge date using the [PLACEMENT STAFFING FORM - Template v.2](#)

2. **Develop Transition Plans**

- For each youth, develop an individualized transition plan identifying a placement appropriate to their needs.
- Engage SSA Placement, LDSS Placement Units, youth and private care providers as needed to secure resources.
- Identify and collaborate with the SSA Placement Team to resolve systemic or capacity-related barriers.

3. **Complete and Maintain the Placement Staffing Form**

- Every day each LDSS must update the Placement Staffing Form for every youth remaining in a hotel until transition to a placement appropriate to their needs is complete.
- The Placement Staffing Form must detail all efforts made to secure placement each day, including outreach to the family, kin, and care provider; staffing updates; and youth engagement.

4. **Upload Documentation to CJAMS**

- The completed Placement Staffing Form must be uploaded daily to CJAMS under the case documentation section.
- Contact notes must accurately reflect current placement status and ongoing transition efforts.

5. **Daily Reporting to SSA**

- Consistent with SSA policy CW#25-0 01, section 3.1, the Assistant Director of Services will hold daily internal touchpoint meetings with their team regarding youth in unlicensed settings to prioritize finding a placement appropriate to a youth's needs.
- Forward the updated Placement Staffing Form to the assigned SSA Placement Analyst each day, noting progress.
- Immediately notify SSA Executive Director and the Office of the Secretary of unresolvable barriers that require SSA or Office of the Secretary intervention, such as a court ordered hotel stay, or a care

provider CEO refusal to accept a youth in a setting that meets the youth's needs.

- o SSA Placement Specialists will continue to convene as frequently as necessary to meet the November 24th deadline.

Support and Technical Assistance

SSA placement analysts are available to assist LDSS teams with placement identification, technical barriers in CJAMS, or coordination with providers. Please contact the SSA Placement Unit by emailing placementand.permanency@maryland.gov.

Placement Options

When identifying placement options, staff must utilize the [FY25 SSA Program List 06.25.25 - Current contracted providers](#) tool to ensure that all relevant factors are considered when identifying a placement appropriate to a youth's needs.

LDSS shall use the Program Placement Questionnaire to inform and support all placement decisions. The Program Placement Questionnaire is the provider profile which the LDSS will use to support placement decisions. The Program Placement Questionnaire for each provider is located in the [SSA Provider Information Folder](#).

If you require assistance identifying a placement resource, please contact the SSA Placement Unit by emailing placementand.permanency@maryland.gov.

Supplemental Directive – After-Hours Placement Resources

SSA recognizes there may be instances when placement resources are needed outside of business hours to ensure immediate safety and care.

Each LDSS must ensure after-hours placement resources are available by:

1. **Identifying and cultivating licensed resource homes** within the jurisdiction that are available to accept youth at any time, including nights and evenings, weekends, and holidays. The LDSS must maintain an updated list of licensed respite homes in the LDSS jurisdiction and update SSA's statewide list.
2. **Facilitate placement with private providers** that agree to accept short-term or emergency placements. SSA will provide an updated list of emergency and respite care placement providers. We ask that your placement team contact SSA to help facilitate short-term or emergency placements.
3. **Document and Notify SSA:** All emergency or respite placements must be entered into CJAMS within 12 hours of the placement and must be reported to the SSA Deputy Executive Director of Child and Family Well-Being and/or SSA

Placement Unit within 12 hours of the placement using dlhotelnotification_dhs@maryland.gov.

SSA's Placement Unit will review after-hours placements daily to ensure compliance with after-hours placement resource requirements, appropriate use of after-hours resources, and timely transition.

Joint Compliance and Oversight

The Office of the Secretary will monitor SSA and all LDSS for adherence to this memorandum. SSA will monitor LDSS compliance through CJAMS documentation and daily reporting. The LDSS director is accountable for their team's adherence to this memorandum. All parties are subject to disciplinary action for noncompliance with this memorandum.

Effective November 24, 2025, all DHS and LDSS finance staff are directed to review any hotel expenditure, payment, or request for payment for an unlicensed setting to ensure that it complies with this memorandum. Examples include a request for payment through a corporate purchase card, direct voucher, provider invoice, or other payment request mechanism. Invoices for services provided after November 24, 2025 may only be paid with the explicit, written permission of the LDSS Director and concurrence by the Office of the Secretary. A DHS employee is subject to discipline who makes an unauthorized payment for facilitating a stay in an unlicensed setting for any Child in Need of Assistance (CINA), or child under the guardianship of the LDSS, or child under a shelter care order, who is in DHS care and custody.

Please direct your questions related to implementing this memorandum to Remonte Green, Deputy Executive Director of Child & Family Well Being, Social Services Administration at remonte.green@maryland.gov.

This memorandum was reviewed and approved for legal sufficiency by the Office of the Attorney General (OAG) on October 16, 2025.