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**STATE OF MINNESOTA
IN COURT OF APPEALS
A19-1901**

In re the Matter of the Welfare of the Child of:
J. A. J. and A. J. H., Parents.

**Filed April 20, 2020
Affirmed
Johnson, Judge**

McLeod County District Court
File No. 43-JV-19-127

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Considered and decided by Slieter, Presiding Judge; Johnson, Judge; and Bjorkman,
Judge.

UNPUBLISHED OPINION

JOHNSON, Judge

The district court terminated a woman's parental rights to her four-year-old child. The sole issue on appeal is whether the county made reasonable efforts to reunite the mother and the child. We conclude that the district court did not clearly err by finding that the county made such efforts. Therefore, we affirm.

FACTS

The appellant, J.A.J., is the mother of a girl, K.L.H., who was born in 2015. K.L.H.'s father is A.J.H. J.A.J. has two older children from a previous relationship, T.R.E. and T.M.E. The parental rights to T.R.E. and T.M.E. are not at issue in this appeal.

A. Carver County CHIPS Case

This appeal arises from judicial proceedings in McLeod County, but the relevant background includes prior administrative and judicial proceedings in Carver County, which were based on four reports that J.A.J. neglected her children.

First, in June 2016, Carver County received a report that J.A.J. and A.J.H. had used marijuana in the presence of T.R.E., T.M.E., and K.L.H. and had locked the children in a bedroom. Second, in March 2017, Carver County received a report that T.R.E., who then was eight years old, was providing care for her younger siblings and that J.A.J. and A.J.H. repeatedly had locked themselves in their own bedroom. Third, in April 2017, a school-van driver reported that T.M.E., who then was five years old, was underdressed and unsupervised. Fourth, in June 2017, a passerby called police after finding that K.L.H., who then was two years old, was wandering alone in the middle of an intersection.

In response to these incidents, Carver County filed a petition in August 2017 to adjudicate the children as being in need of protection and services. Carver County also brought an *ex parte* motion for immediate custody. The district court granted the motion, and the children were removed from J.A.J. and A.J.H.'s care. Shortly thereafter, both J.A.J. and A.J.H. tested positive for methamphetamine. J.A.J. completed a chemical-dependency assessment, which did not result in a finding of chemical dependency or abuse but led to a

recommendation that she abstain from non-prescribed controlled substances and comply with her child-protection case plan. In October 2017, an independent clinical social worker, Deena McMahon, completed a court-ordered parenting assessment of J.A.J. McMahon recommended that J.A.J. work with a therapist to address her mental-health and chemical-use issues as well as her parenting skills.

J.A.J. successfully completed her case plan, and the Carver County CHIPS case was closed by agreement of the parties in August 2018. J.A.J. and A.J.H. moved to McLeod County with K.L.H. T.R.E. and T.M.E. began living with their father, J.A.J.'s former husband, on a full-time basis.

B. McLeod County CHIPS Case

In late 2018, McLeod County (hereinafter "the county") received two reports of child neglect by J.A.J. First, on December 4, 2018, it was reported that K.L.H. had caused a bathtub to overflow while J.A.J. slept and while T.M.E. and T.R.E. were present. A social worker and a police officer spoke with J.A.J. and the older children and determined that J.A.J. had slept through breakfast and lunch on that day. Second, on December 26, 2018, it was reported that J.A.J. and A.J.H. were using and selling methamphetamine. A social worker and a police officer visited J.A.J.'s home two days later, at which time J.A.J. agreed to submit to a urinalysis. On January 4, 2019, the urinalysis indicated a positive result for methamphetamine. The county placed all three children on an emergency 72-hour hold. T.M.E. and T.R.E. were placed with their father. J.A.J. absconded with K.L.H. The county tracked J.A.J.'s cellphone to a motel in Sibley County, where a police

officer found J.A.J. and K.L.H. K.L.H. was returned to McLeod County and placed in a foster home.

On January 7, 2019, the county filed a petition to adjudicate the three children as being in need of protection and services. On the same date, the county filed a motion for emergency protective care. The district court granted the motion and ordered that K.L.H. be placed in foster care.

On January 28, 2019, a county social worker conducted a chemical-dependency assessment, concluded that J.A.J. met the criteria for a mild alcohol-use disorder, and recommended, among other things, that J.A.J. attend an inpatient treatment program at Wellcome Manor and abstain from all mood-altering chemicals, including alcohol. J.A.J. entered inpatient treatment at Wellcome Manor on February 11, 2019, and tested positive for methamphetamine at intake. It appears from the record that Wellcome Manor was selected as a treatment provider because the facility would allow K.L.H. to live with J.A.J. there. J.A.J. expected K.L.H. to join her at Wellcome Manor and repeatedly asked the county when she would be placed at the facility. But the county did not place K.L.H. with J.A.J. at Wellcome Manor. The record does not indicate whether J.A.J. ever asked the district court to order such a placement. While at Wellcome Manor, J.A.J. was diagnosed with severe alcohol-use disorder. She remained at Wellcome Manor until she was discharged on June 25, 2019, more than four months after intake, with a recommendation that she complete intensive outpatient chemical-dependency treatment and continue to attend individual therapy.

The district court conducted a review hearing on February 19, 2019, and a settlement conference on March 11, 2019. At the latter hearing, J.A.J. admitted the allegations of the CHIPS petition. On March 15, 2019, the district court adjudicated K.L.H. and her two siblings as children in need of protection or services.

J.A.J.'s first out-of-home placement plan is dated March 19, 2019, and was signed by J.A.J. on the following day. This case plan was filed with the district court approximately one month later, on April 17, 2019. The county filed five additional case plans with the district court on September 18, 2019. It appears that the district court never expressly approved any of the case plans. Only two of the five case plans are in the appellate record, and neither was signed by K.L.H.'s guardian *ad litem*.

On April 5, 2019, McMahon, who had assessed J.A.J.'s parenting skills in Carver County, completed a new court-ordered parenting assessment of J.A.J. McMahon's written report notes that J.A.J. hoped to have K.L.H. join her at Wellcome Manor. But the report states that McMahon and J.A.J. "discussed that the transient population at Wellcome Manor would be confusing to [K.L.H.] and that she could struggle as people transitioned in and out of the program." McMahon also noted that J.A.J. "seemed to understand that constantly having so many other women around full-time would not be in [K.L.H.'s] best interests, given her age." McMahon's report concludes that "very little has changed since J.A.J.'s October 2017 parenting assessment" and that "[t]he behavior patterns she exhibited during this current case are completely consistent with [J.A.J.]'s prior child protection case." McMahon perceived that J.A.J. had not accepted the results of her chemical-dependency assessment. McMahon's report also states, "[J.A.J.] does not demonstrate

much improvement in her parenting skills,” “has very little insight into how her parenting impacts her daughter,” and “is not an attuned or insightful parent.” McMahon’s report further observed, “In [J.A.J.’s] October 2017 assessment, the recommendations reflected hopefulness that she would be able to make and sustain the necessary changes to become a safe and stable mother” but that “[o]ffering the same recommendations to address the very same deficits just 19 months later seems futile.” McMahon recommended that “[p]ermanency for [K.L.H.] should be established outside of [J.A.J.]’s custody as soon as possible,” that J.A.J.’s visits with K.L.H. at Wellcome Manor should be supervised, and that J.A.J. should continue to work on her chemical-dependency and mental-health issues. McMahon also recommended that, after “permanency for [K.L.H.] is established,” J.A.J.’s contact with K.L.H. should be “at the discretion of [K.L.H.’s] adoptive parents” and only so long as J.A.J. remains sober.

C. McLeod County TPR Case

On June 17, 2019, the county petitioned to terminate J.A.J.’s and A.J.H.’s parental rights on three grounds: (1) that J.A.J. and A.J.H. substantially, continuously, or repeatedly refused or neglected to comply with their parental duties; (2) that J.A.J. and A.J.H. are palpably unfit to be a party to the parent-child relationship; and (3) that reasonable efforts have failed to correct the conditions leading to K.L.H.’s out-of-home placement. *See* Minn. Stat. § 260C.301, subd. 1(b)(2), (4), (5) (2018).

The district court conducted a review hearing in the CHIPS case the following day. In an order filed after the review hearing, the district court found that the county “has made reasonable efforts to prevent placement or to eliminate the need for removal” and that the

county “has exercised due diligence in providing appropriate and available services to meet the needs of the children and the family.”

The district court conducted two additional review hearings in July and August of 2019. In an order filed after the July review hearing, the district court found that J.A.J. “is compliant with her case plan.” At the July review hearing, J.A.J. requested a second parenting assessment by a different evaluator. Two weeks later, on July 31, 2019, the district court filed an order in which it denied J.A.J.’s request but ordered an updated assessment by McMahon.

McMahon completed an updated parenting assessment of J.A.J. on September 10, 2019. This assessment was based on McMahon’s observations of K.L.H. with J.A.J. and K.L.H. with her foster mother, interviews of J.A.J. and K.L.H.’s foster mother, and a review of reports prepared by a pediatric therapist. McMahon noted that K.L.H. engaged in numerous regressive behaviors before, during, and after visits with J.A.J. McMahon determined that J.A.J.’s parenting skills have improved, that her lifestyle is more stable, that she is “sincere in her desire to remain sober and to be a full-time parent to her daughter,” and that she has “successfully completed her case plan.” But McMahon concluded that K.L.H. “has negative and traumatic embedded memories of her mother and of their life together” and that “[r]eturning [K.L.H.] to [J.A.J.]’s custody would force [K.L.H.] to live in a situation where she would be almost constantly emotionally dysregulated,” which “would undermine every aspect of her development” and “impair her ability to attach to [J.A.J.]” McMahon noted, “Timelines for permanency have already exceeded statute. Adding another six months to the out of home case plan would not be in

[K.L.H.'s] best interest.” McMahon recommended that K.L.H. “be allowed to remain in her current home for adoption,” that she “work with therapeutic supports on a regular basis to address past trauma and the impact it has had on her life.” McMahon also recommended that a “closure session” between K.L.H. and J.A.J. be “therapeutically guided” and that “[a]ny future contact between [J.A.J.] and [K.L.H.] needs be based on what is in [K.L.H.]’s best interests.”

On September 16, 2019, J.A.J.’s outpatient chemical-dependency treatment provider wrote a letter to the district court, stating that J.A.J. had “demonstrated significant internal motivation for change,” “regularly attended recovery-based self-help support groups and [met] with her sponsor,” and consistently passed randomized drug tests. The provider also reported that J.A.J. had attended individual therapy sessions and demonstrated “insight and meaningful change . . . beyond that of the ability of most individuals served at this agency.”

At the next review hearing on September 17, 2019, the county requested that J.A.J.’s supervised visits with K.L.H. be suspended on the ground that K.L.H. “continues to suffer from significant emotional and behavioral issues as a result of contact with” J.A.J. In an order filed after the review hearing, the district court granted the county’s request and suspended J.A.J.’s visits “until further order of the Court.”

The permanency case was tried on three days in October 2019. The district court heard testimony from nine witnesses. On November 13, 2019, the district court filed a 26-page order in which it found that the county had proved all three of the alleged grounds. The district court also found that the county had made reasonable efforts to reunite J.A.J.

with K.L.H. and that terminating J.A.J.’s parental rights is in K.L.H.’s best interests. The district court also terminated the parental rights of A.J.H., who had failed to appear for trial after lunch on the first day of trial. J.A.J. appeals.

D E C I S I O N

J.A.J. argues that the district court erred by granting the county’s petition to terminate her parental rights. Specifically, J.A.J. argues that the district court erred by finding that the county made reasonable efforts to reunite her with K.L.H.

After a CHIPS adjudication, a county social services agency must make “reasonable efforts . . . to prevent placement or to eliminate the need for removal and to reunite the child with the child’s family at the earliest possible time.” Minn. Stat. § 260.012(a) (2018). Reasonable efforts “are always required,” subject to a few exceptions. *Id.* For example, reasonable efforts are not required if they would be “futile and therefore unreasonable under the circumstances.” *Id.* (a)(7). In determining whether a county has made reasonable efforts, a district court shall consider whether the services offered by the county were “(1) relevant to the safety and protection of the child; (2) adequate to meet the needs of the child and family; (3) culturally appropriate; (4) available and accessible; (5) consistent and timely; and (6) realistic under the circumstances.” *Id.* (h). “Reasonable efforts at rehabilitation are services that go beyond mere matters of form so as to include real, genuine assistance.” *In re Welfare of Children of S.W.*, 727 N.W.2d 144, 150 (Minn. App. 2007) (quotations omitted), *review denied* (Minn. Mar. 28, 2007).

Unless an exception exists, a district court may not terminate parental rights without finding that the county made reasonable efforts to “finalize the permanency plan to reunify”

the family and without making “individualized and explicit findings regarding the nature and extent” of the county’s efforts to rehabilitate the parent and reunite the family. Minn. Stat. § 260C.301, subd. 8; *see also In re Children of T.A.A.*, 702 N.W.2d 703, 709 (Minn. 2005). This court applies a clear-error standard of review to a district court’s finding that a county made reasonable efforts at reunification. *In re Welfare of Children of S.E.P.*, 744 N.W.2d 381, 385, 387 (Minn. 2008).

J.A.J.’s appellate brief identifies three specific issues. We construe her statement of the legal issues as a three-part argument. We address each argument in turn.

A.

J.A.J. first argues that she should have been given the opportunity to engage in parent-child therapy with K.L.H., which she asserts would have been reasonable even though the statutory permanency timelines had passed. J.A.J. states that McMahon “opined that parent-child therapy could perhaps address the disconnect between mother and daughter, but it would take extensive work and require many months, at a minimum.” She also states that she requested the opportunity to engage in parent-child therapy but that the district court denied the request.

As an initial matter, it is important to be precise in describing McMahon’s position with respect to parent-child therapy between J.A.J. and K.L.H. McMahon’s written report concludes with eight enumerated “findings and recommendations,” the fifth of which states: “[K.L.H.] should work with therapeutic supports on a regular basis to address past trauma and the impact it has had on her life. Her foster parents should participate, as recommended. This could include play therapy, trauma-focused occupational

therapy/sensory work, or some form of parent/child therapy.” The seventh recommendation is for a “closure session” between K.L.H. and J.A.J. And the eighth recommendation is that “[a]ny future contact between [J.A.J.] and [K.L.H.] needs to be based on what is in [K.L.H.]’s best interests.”

When the fifth recommendation is considered in light of the other recommendations and the report as a whole, McMahon’s reference to parent-child therapy does not appear to be a recommendation clearly in favor of parent-child therapy. The record does not indicate whether J.A.J. ever asked the county to allow parent-child therapy after McMahon completed her report on September 10, 2019, approximately one month before trial. At that time, both the county and the district court were inclined to allow less contact between J.A.J. and K.L.H., not more. At the September 17, 2019 review hearing, the district court considered the county’s request to discontinue J.A.J.’s supervised visits with K.L.H., and the district court ultimately granted that request. At trial, McMahon elaborated on the issue of parent-child therapy by testifying that such sessions were possible, but would need to “start in very small doses” because an hour-long session would be “intolerable” for K.L.H. In her oral closing argument, J.A.J. asked the district court to not terminate her parental rights so that she could engage in parent-child therapy.

In its termination order, the district court generally credited the evidence provided by McMahon. The district court recited and quoted excerpts from McMahon’s written report following her last parenting assessment. The district court also recited portions of McMahon’s trial testimony. Specifically, the district court stated, “McMahon testified that, at a minimum, six months is necessary to ‘undo’ K.L.H.’s opinions of Mother before work

could start to develop new opinions and impressions of Mother.” With respect to the subject of parent-child therapy, the district court stated, “McMahon was not recommending parent-child therapy as K.L.H cannot tolerate it.” In its conclusions of law, the district court referred to “[t]he uncertainty that parent-child interaction therapy between Mother and K.L.H. will be successful or [whether] K.L.H. can tolerate reunification therapy with Mother.”

In light of the evidentiary record, the district court did not err by not giving J.A.J. an opportunity to engage in parent-child therapy with K.L.H. before terminating J.A.J.’s parental rights. The district court made findings on the issue of reasonable efforts that are supported by substantial evidence in the record, especially the report and testimony of McMahon. It must be remembered that a county is not required to pursue every possible means of reunification; rather, a county is required only to make efforts that are reasonable. *See* Minn. Stat. § 260.012(h). In addition, “In determining reasonable efforts to be made with respect to a child and in making those reasonable efforts, *the child’s best interests, health, and safety must be of paramount concern.*” *Id.* (a) (emphasis added). Here, the district court focused on K.L.H.’s best interests, as did McMahon. Thus, the evidentiary record provided the district court with ample grounds to determine that K.L.H.’s best interests were served by not ordering parent-child therapy.

The district court’s decision also must be understood in the context of the statutory permanency deadlines. The legislature has determined that a district court must hold an admit-deny hearing in a permanency case no later than one year after the child is placed in foster care. Minn. Stat. § 260C.503, subd. 1(a) (2018). Time spent in foster care in a prior

CHIPS proceeding is included in this calculation. *Id.*, subd. 3(b)(2); *see also* Minn. R. Juv. Prot. P. 27.02, subd. 1(a)(3). A district court must start a trial within 60 days of the admit-deny hearing, complete the trial within 30 days, and issue a decision within 15 days thereafter. Minn. R. Juv. Prot. P. 52.02, subds. 4, 5. In this case, the permanency trial began more than 60 days after the admit-deny hearing, at which time K.L.H. had been in foster care for 523 days. J.A.J.’s argument that the county should have allowed more time for parent-child therapy, or that the district court should have ordered it instead of ordering termination, is in tension with the statutory permanency deadlines.

Thus, the district court did not clearly err by finding that the county made reasonable efforts at reunification without giving J.A.J. an opportunity to engage in parent-child therapy before terminating her parental rights.

B.

J.A.J. next argues that she should have been given an opportunity to demonstrate her ability to be a parent to K.L.H. J.A.J. states, “Sporadic supervised visits are insufficient to allow a respondent parent to demonstrate her ability to parent overnight or without supervision.”

J.A.J.’s parenting ability naturally was a subject of McMahon’s last parenting assessment. McMahon summarized her written report by stating that J.A.J.’s “parenting skills have improved,” that her lifestyle “appears to be more stable and consistent,” that she “has housing and newfound employment,” that she “has a support group that is sober and reports she is not in a relationship with [A.J.H.],” and that she is “sincere in her desire to remain sober and to be a fulltime parent to her daughter.” But McMahon’s assessment

of J.A.J.'s improvements was outweighed by McMahon's concern about K.L.H.'s best interests. As described above, McMahon's summary, findings, and recommendations were predominantly influenced by the difficulties experienced by K.L.H. after her visits with J.A.J. At trial, McMahon elaborated on the issue of J.A.J.'s parenting ability by testifying that J.A.J. appeared "overwhelmed" during supervised visits and that she "had a hard time understanding what her children were experiencing emotionally" and correctly addressing their behavior. In oral closing argument, J.A.J. asked the district court to not terminate her parental rights so that she could demonstrate her improved parenting abilities.

In its findings of fact, the district court found that, in late 2017, in the Carver County CHIPS case, McMahon initially was inclined to recommend that J.A.J.'s parental rights be terminated but ultimately recommended that additional services be provided to J.A.J. because of her "sincere desire to change, love for her children and [her] motivation to work the case plan." The district court also found that, in early 2019, in the McLeod County CHIPS case, "McMahon noted in her assessment that very little had changed since [J.A.J.'s] October 2017 parenting assessment" and that "[t]he same deficits that were noted 19 months earlier continued to remain." The district court further found that, in McMahon's last assessment, "McMahon noted that [J.A.J.] has made significant progress and demonstrated improved parenting skills." But the district court then made findings that focused on McMahon's observations of the impact of J.A.J.'s parenting on K.L.H. and on K.L.H.'s best interests. The district court found that there is "no doubt that [J.A.J.] loves K.L.H. and wants to parent her" but that "supervised visits with [J.A.J.] are harmful to K.L.H. due to the lack of attachment causing K.L.H.'s dysregulation."

It is true that J.A.J. did not have much of an opportunity to demonstrate her parenting skills during the pendency of the McLeod County CHIPS and permanency proceedings. J.A.J. was in inpatient treatment at Wellcome Manor from February until June 2019, during which time she was allowed only supervised visits with K.L.H. The record does not indicate whether, in the early stages of the CHIPS proceeding, J.A.J. sought an order from the district court to have K.L.H. placed with her at Wellcome Manor. The fact that J.A.J. had limited contact with K.L.H. during her relatively long residency at Wellcome Manor surely made it more difficult for J.A.J. to obtain increased contact at a later date. Within a month after J.A.J. completed her inpatient treatment at Wellcome Manor, the district court granted the county's request to suspend J.A.J.'s supervised visits with K.L.H. The district court did recognize in its termination order that J.A.J.'s parenting skills had improved. But that fact alone could not ensure that J.A.J. would successfully parent K.L.H. in the foreseeable future because of the extensive history of neglect and its effect on K.L.H. Again, in determining whether reasonable efforts have been made, "the child's best interests, health, and safety must be of paramount concern." Minn. Stat. § 260.012(a). The district court's decision to terminate J.A.J.'s parental rights without allowing her an additional opportunity to demonstrate her parenting skills is appropriately based on this statutory principle and on the evidence provided by McMahon.

Thus, the district court did not clearly err by finding that the county had made reasonable efforts at reunification without giving J.A.J. an opportunity to demonstrate her ability to be a parent to K.L.H.

C.

J.A.J. last argues that the county did not make reasonable efforts at reunification because the county did not comply with the statutory requirements governing case plans.

A county's obligation to make reasonable efforts at reunification includes the preparation of a case plan. Whenever a county removes a child from a parent's care, the county must "prepare an out-of-home placement plan addressing the conditions that [the] parent must meet before the child can be in that parent's day-to-day care." *In re Welfare of A.R.B.*, 906 N.W.2d 894, 897 (Minn. App. 2018) (quoting Minn. Stat. § 260C.219(a)(2)(i)). An "out-of-home placement plan" is a document prepared "jointly with the parent or parents or guardian of the child." Minn. Stat. § 260C.212, subd. 1(b) (2018). "The plan 'shall be' signed by the parent, submitted to the court for approval, and explained to all persons involved in its implementation." *A.R.B.*, 906 N.W.2d at 897 (quoting Minn. Stat. § 260C.212, subd. 1(b)). The case plan must describe "the specific reasons for the placement of the child in foster care, and when reunification is the plan, a description of the problems or conditions in the home of the parent or parents which necessitated removal of the child from home and the changes the parent or parents must make for the child to safely return home," as well as the "services offered and provided to prevent removal of the child from the home and to reunify the family." Minn. Stat. § 260C.212, subd. 1(c)(2)-(3).

J.A.J. contends that the county failed to comply with the applicable statutory requirements in four ways: (1) by not preparing the plan within 30 days of K.L.H.'s court-ordered placement in foster care, *see* Minn. Stat. § 260C.212, subd. 1(a); (2) by not

submitting the case plan to the district court within 30 days of K.L.H.'s court-ordered placement in foster care, *see id.*, subd. 1(b)(1), .178, subd. 7(a) (2018); (3) by not obtaining the district court's approval of a case plan, Minn. Stat. § 260C.212, subd. 1(b)(2); and (4) by not obtaining the guardian *ad litem*'s signature on the case plan, *see id.*, subd. 1(b)(3).

In response, the county essentially concedes that it did not comply with the statute but contends that its non-compliance was immaterial. The county states that case plans were developed with J.A.J. and that J.A.J. agreed to them and signed them. The county acknowledges that it failed to file multiple case plans with the district court until September 2019, only one month before trial. The county states that, although it did not obtain the district court's approval of a case plan, the terms of the case plans are consistent with the orders issued by the district court throughout the pendency of the CHIPS and permanency cases. The county does not respond to J.A.J.'s argument that the guardian *ad litem* did not sign any of the case plans. The county contends that this case is distinguishable from *A.R.B.*, in which no written case plan was prepared. *See* 906 N.W.2d at 897.

It is true that the county's failure to comply with the statute in this case is less flagrant than the failure in *A.R.B.* Nonetheless, the question remains whether J.A.J. is entitled to an appellate remedy for the county's failures to comply with the statute. The county cites *In re Welfare of S.R.A.*, 527 N.W.2d 835 (Minn. App. 1995) (implicitly overruled on other grounds by *In re Welfare of D.D.G.*, 558 N.W.2d 481, 485 (Minn. 1997)), *review denied* (Minn. Mar. 29, 1995), for the proposition that the failure to timely file a case plan does not necessarily require reversal of a termination of parental rights. In

S.R.A., the county failed to file multiple case plans with the district court when required, but this court reasoned that the county's non-compliance should be balanced against the child's best interests, and we concluded that the best interests of the child in that case outweighed the county's "technical violation." 527 N.W.2d at 839.

In this case, it does not appear that the county's non-compliance with the statutory requirements had a significant or material negative effect on the county's reunification efforts. J.A.J. signed the first case plan in March 2019. Thereafter she appeared for review hearings, with counsel, in June, July, August, and September of 2019. This court has not been provided with transcripts of the review hearings, but the district court's order following the July review hearing indicates that the terms of the case plans were known to all parties and their counsel. Indeed, the district court's finding that J.A.J. complied with her case plan indicates that she was not prejudiced by the county's non-compliance with the statutory requirements. Accordingly, we conclude that the county's technical violations are outweighed by K.L.H.'s best interests, which played a prominent part in the district court's termination order. *See S.R.A.*, 527 N.W.2d at 839.

Thus, the district court did not clearly err by finding that the county had made reasonable efforts at reunification even though the county did not comply with the statutory requirements governing case plans.

In sum, the district court did not clearly err by finding that the county made reasonable efforts at reunification and, thus, did not err by granting the county's termination petition and terminating J.A.J.'s parental rights to K.L.H.

Affirmed.