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Minn. R. Civ. App. P. 136.01, subd. 1(c).*

**STATE OF MINNESOTA
IN COURT OF APPEALS
A26-0484**

In the Matter of the Welfare of the Child(ren) of: K. L. O. and M. L. G., Parents.

**Filed September 8, 2026
Affirmed
Bratvold, Judge**

Lyon County District Court
File No. 42-JV-25-121

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Considered and decided by Bratvold, Presiding Judge; Schmidt, Judge; and Harris, Judge.

NONPRECEDENTIAL OPINION

BRATVOLD, Judge

On appeal from an order involuntarily terminating her parental rights to her child, appellant mother argues that the district court abused its discretion by determining that (1) a statutory basis to terminate her parental rights exists, (2) the county made reasonable efforts to reunify the family, and (3) termination was in the best interests of the child. Because the record supports the district court's factual findings and the district court did not abuse its discretion in ordering termination, we affirm.

FACTS

Appellant K.L.O. is the mother of O.M.G., who was born in March 2025.¹ That month, respondent Southwest Health and Human Services (the county) received a report that mother had given birth to O.M.G., had not provided adequate prenatal care for O.M.G., and was arrested in the hospital for pending criminal charges. Mother was released from custody the same day she was arrested. Following a 72-hour hold, the county placed O.M.G. with his maternal grandmother. And after an emergency protective-care hearing, O.M.G.—who was five days old at the time—was placed with grandmother by court order. As explained below, the county later removed O.M.G. from grandmother’s home and placed him in nonrelative foster care.

The county filed a child-in-need-of-protection-or-services (CHIPS) petition based, in part, on the 2021 involuntary termination of mother’s parental rights to another child. On April 7, 2025, mother admitted to the CHIPS petition and the district court adjudicated O.M.G. as CHIPS.

On April 25, 2025, the county filed an out-of-home placement plan. Among other things, the plan required mother to “abstain from the use of all mood-altering chemicals”; “submit to random drug testing,” including “urine analysis, sweat patch, alcohol monitoring, hair testing, nail testing, and saliva testing”; provide proof of attending “sober

¹ M.L.G. is the father of O.M.G. Father “voluntarily entered an admission to terminate his parental rights,” which the district court accepted. *See* Minn. Stat. § 260C.301, subd. 1(a) (2024) (stating that the district court may terminate parental rights “with the written consent of a parent”). Father filed a letter with this court stating that he “will not be participating in this appeal.”

support services”; obtain a diagnostic assessment of her mental health and abide by its recommendations; complete parenting classes and a parent-capacity assessment; “demonstrate that she can provide a safe and stable home” for O.M.G.; attend O.M.G.’s medical appointments; and abide by the county’s “visitation rules, restrictions, and expectations.”

On October 1, 2025, the county petitioned for termination of mother’s parental rights, alleging four grounds for termination: (1) mother refused or neglected to comply with her parental duties for O.M.G.; (2) mother was palpably unfit to parent O.M.G.; (3) reasonable efforts failed to correct the conditions leading to O.M.G.’s out-of-home placement; and (4) O.M.G. was neglected and in foster care.

In January 2026, the district court conducted a two-day bench trial on the county’s petition. The district court received exhibits and heard testimony from two county social workers, two licensed alcohol and drug counselors, a district supervisor for corrections, the guardian ad litem (GAL), and mother. The following summarizes the district court’s factual findings and evidence relevant to the issues on appeal.

Parenting Time

During O.M.G.’s initial out-of-home placement with grandmother, mother received “liberal supervised visitation” so she could bond with and breastfeed O.M.G. After about a month, the county removed O.M.G. from grandmother’s home and placed him in nonrelative foster care. A social worker testified that the county changed O.M.G.’s placement because mother spent nights at grandmother’s home without permission from

the county, mother co-slept with O.M.G.,² and mother smoked “in the same room where [O.M.G.] was also sleeping.” After O.M.G.’s placement in nonrelative foster care, mother regularly attended visitation with O.M.G., and these visits went well. Mother’s visits were supervised because she tested positive for methamphetamine.

Use of Mood-Altering Substances and Chemical-Use Testing

Mother tested positive for methamphetamine eight times during the CHIPS proceeding. One of the social workers testified that mother tampered with her sweat patches in July and August 2025. Mother also refused two hair-follicle tests in June 2025, refused sweat-patch testing after a negative hair-follicle test in September 2025, and refused a urine analysis in December 2025.

Despite these test results and her test refusals, mother repeatedly denied methamphetamine use. Mother attributed the positive results to environmental exposure, including (1) sharing a cigarette with her sister, who was actively using; (2) interacting with grandmother’s ex-boyfriend, who was actively using; and (3) having sexual intercourse with men who were actively using. According to one of the social workers, mother reported that her exposure to methamphetamine “mainly” occurred at grandmother’s home.

Mother’s use of and exposure to mood-altering substances also affected O.M.G. because mother continued to breastfeed O.M.G. A social worker testified that she spoke with mother about the dangers of breastfeeding while testing positive for

² A social worker testified that co-sleeping was against the safe-sleep requirements for foster care of an infant.

methamphetamine. In response, mother denied using methamphetamine and disagreed with the county's guidance that mother should not breastfeed O.M.G.

In September 2025—after testing positive for methamphetamine—mother completed a substance-use-disorder assessment with one of the counselors. The counselor testified that mother denied using drugs and, therefore, he did not recommend chemical-dependency treatment.³

At trial, mother testified that the last time she used methamphetamine was in March 2023. As she had stated in her communications with the county, mother testified that she believed she tested positive because of “sexual intercourse with a drug user” and “being in a filthy environment of meth use.” Mother also testified that she was environmentally exposed to methamphetamine at grandmother's house. The district court found “mother's explanations to lack credibility.” The district court also found that mother “did not . . . remain drug-free.”

Chemical-Dependency Treatment

Also in September 2025, mother completed a parental-capacity assessment that recommended she enter inpatient chemical-dependency treatment. In late November 2025, mother sought admission at New Life Treatment Center with assistance from the county. New Life did not admit mother because she denied using methamphetamine after 2023.

³ The counselor testified that the county sent him mother's positive sweat-patch test results and that, while mother tested positive for methamphetamine, the amphetamine metabolite did not meet the “federal legal requirements” for a positive result. The district court discredited the counselor's testimony on this point, finding that the counselor did not contact collateral sources and did not “have specialized training in sweat-patch testing.”

After New Life denied mother's admission, the county referred mother to Project Turnabout—another inpatient chemical-dependency treatment facility. Mother signed the necessary release-of-information documents in January 2026.

Mother was admitted to Project Turnabout on January 9, 2025—less than three weeks before trial. A counselor from Project Turnabout testified that mother continued to deny methamphetamine use and was “ambivalent to change.” The counselor testified that mother had a “very severe” risk of relapse because (1) she “does not live independently”; (2) she is “involved with [child protective services] and probation”; and (3) she associates with “other people who are using substances.” The counselor recommended that, when mother completed the program at Project Turnabout, she should continue medium-intensity inpatient treatment, which would take “months” to complete.

Housing and Employment

When O.M.G. was born, mother lived in an apartment. Around November 2025, mother had fallen behind on rent, did not renew her lease, and moved in with grandmother. A social worker testified that this was concerning because mother reported that she was environmentally exposed to methamphetamine in grandmother's home. Mother testified that, if O.M.G. were returned to her care, they would return to grandmother's home and then mother would find independent housing.

In the summer of 2025, mother worked for a dry-cleaning business. In November 2025, mother reported that she was fired from her job for seeking treatment at New Life. A social worker testified that mother later received a job offer as a caretaker, but that mother reported lying to the prospective employer. Mother testified that she told

the employer that she could not start work immediately because she was caring for grandmother. At the time, mother was in treatment at Project Turnabout. Mother also testified that the prospective employer had not completed her background check.

District Court's Decision

On February 27, 2026, the district court filed findings of fact, conclusions of law, and an order terminating mother's parental rights. The district court determined that clear and convincing evidence established four statutory grounds for termination. Specifically, the district court determined that (1) mother has substantially, continuously, or repeatedly refused or neglected to comply with the duties imposed on her as a parent; (2) mother was palpably unfit to parent O.M.G.; (3) O.M.G. was neglected and in foster care; and (4) reasonable efforts have failed to correct the conditions that led to O.M.G.'s out-of-home placement. *See* Minn. Stat. § 260C.301, subd. 1(b)(2)-(4), (7) (2024).

In its failure-to-correct-conditions determination, the district court reasoned that, despite the services offered by the county, mother “did not complete treatment or remain drug-free,” “abandoned her apartment due to her being behind on her rent,” “moved in with [grandmother] where Mother was exposed to persons who use methamphetamine,” and “continued to be on probation.” The district court also determined that the county made reasonable efforts to reunify mother with O.M.G. and that termination of mother's parental rights was in the best interests of O.M.G. *See* Minn. Stat. § 260C.301, subds. 7, 8 (2024). Accordingly, the district court terminated mother's parental rights to O.M.G.

Mother appeals.

DECISION

Appellate courts review a district court's order terminating parental rights for abuse of discretion. *In re Welfare of Child of J.H.*, 968 N.W.2d 593, 600 (Minn. App. 2021), *rev. denied* (Minn. Dec. 6, 2021). "A district court abuses its discretion by making findings of fact that are unsupported by the evidence, misapplying the law, or delivering a decision that is against logic and the facts on record." *Woolsey v. Woolsey*, 975 N.W.2d 502, 506 (Minn. 2022) (quotation omitted). We review the district court's underlying factual findings for clear error. *J.H.*, 968 N.W.2d at 600. Factual findings "are clearly erroneous when they are manifestly contrary to the weight of the evidence or not reasonably supported by the evidence as a whole." *In re Civ. Commitment of Kenney*, 963 N.W.2d 214, 221 (Minn. 2021) (quotation omitted). In reviewing findings for clear error, we defer to the district court's credibility determinations and do not reweigh the evidence or witness testimony. *Id.* at 223.

"Parental rights are terminated only for grave and weighty reasons." *In re Welfare of M.D.O.*, 462 N.W.2d 370, 375 (Minn. 1990). A district court may terminate parental rights after making three determinations: "(1) at least one statutory ground for termination is supported by clear and convincing evidence, (2) the county made reasonable efforts to reunite the family, and (3) termination is in the child's best interests." *J.H.*, 968 N.W.2d at 600. Mother challenges all three determinations on appeal. Thus, we consider each in turn.

I. The district court did not abuse its discretion by determining that a statutory ground exists to terminate mother’s parental rights.

The statutory grounds for terminating parental rights are enumerated in Minnesota Statutes section 260C.301, subdivision 1 (2024). The county has “the burden of producing clear and convincing evidence that one or more of the statutory termination grounds exists.” *In re Welfare of C.K.*, 426 N.W.2d 842, 847 (Minn. 1988). Here, the district court determined that the county proved four statutory grounds to terminate mother’s parental rights under subdivision 1(b)(2), (3), (4), and (7). Mother challenges each statutory ground on appeal, but one statutory ground is sufficient to affirm the district court’s order terminating mother’s parental rights. *See id.* We review these determinations for abuse of discretion. *J.H.*, 968 N.W.2d at 600.

Subdivision 1(b)(4) provides that termination of parental rights may be warranted upon a finding that, “following the child’s placement out of the home, reasonable efforts, under the direction of the court, have failed to correct the conditions leading to the child’s placement.” Minn. Stat. § 260C.301, subd. 1(b)(4). The critical inquiry is “whether the parent is presently able to assume the responsibilities of caring for the child.” *In re Welfare of Child of J.K.T.*, 814 N.W.2d 76, 89 (Minn. App. 2012).

According to the district court, the conditions that led to O.M.G.’s out-of-home placement were mother’s (1) arrest warrant, (2) child-protection history, (3) “failure to obtain proper prenatal care during her pregnancy,” (4) “drug use history,” and (5) “housing instability.” The district court determined that, despite the services offered by the county, mother did not correct these conditions. On appeal, mother argues that the evidence shows

“these conditions have been corrected or no longer exist in a manner that would justify continued out-of-home placement.”

First, mother argues that she “no longer has an active arrest warrant.” We agree with mother that the record shows her arrest warrant was quashed shortly after her arrest at the hospital and that she is now on probation. Thus, this condition was corrected.

Second, mother argues that her child-protection history, including the previous termination of her parental rights to another child, is not alone sufficient to establish a present inability to parent. We agree. A prior involuntary termination of parental rights can establish a rebuttable presumption that a person is palpably unfit to parent. Minn. Stat. § 260C.301, subd. 1(b)(3). But as we analyze this statutory ground—failure to correct conditions that led to O.M.G.’s out-of-home placement—we need not consider whether mother is palpably unfit or her prior inability to parent. Rather, we focus on whether mother “is *presently* able to assume the responsibilities of caring for the child.” *J.K.T.*, 814 N.W.2d at 89 (emphasis added). Thus, mother’s child-protection history is relevant evidence but not a condition to be corrected.

Third, mother argues that “the concern regarding prenatal care” was “no longer relevant at the time of trial.” While we agree with mother that O.M.G. no longer needs *prenatal* care, mother still must demonstrate an ability to care for O.M.G. and provide for O.M.G.’s needs. In its findings, the district court acknowledged that mother completed parenting education. But the district court found that mother could not “provide the child with safe and appropriate care,” in part because she “lacked insight into the dangers of breastfeeding a child while methamphetamine was present in her system.” The record

therefore supports the district court's determination that mother did not correct this condition.

Fourth, mother argues that evidence of past substance use does not prove "current [chemical] use or impairment affecting her ability to parent." The district court's determinations went beyond past substance use. The district court found that mother did not correct her chemical dependency because she did not "remain drug-free" or "complete treatment." The record supports these findings. Mother tested positive for methamphetamine seven times during the CHIPS proceeding. Mother refused multiple tests and tampered with her sweat patches. And mother testified that she was environmentally exposed to methamphetamine by engaging with drug users. The district court explicitly discredited mother's testimony on this point but noted that—if environmental exposure occurred—it was concerned that mother associated with people who were actively using methamphetamine. Even after mother entered inpatient chemical-dependency treatment, she was "ambivalent to change" and acknowledged socializing with others who use chemical substances.

Fifth, mother asserts that her participation in chemical-dependency treatment shows "both insight into the [county's] concerns and a concrete commitment to addressing them." The record contradicts mother's argument because it shows that mother lacked insight into the county's chemical-dependency concerns, delayed her treatment, and did not complete treatment. According to the trial testimony, mother denied methamphetamine use to social workers, to the counselor who conducted her substance-use-disorder assessment, to New Life, to the counselor at Project Turnabout, and to the district court itself. Mother delayed

her treatment by denying use and failing to sign required release documents. Although mother was in treatment at the time of trial, her counselor testified that she had a severe risk of relapse and needed months of medium-intensity residential programming to complete treatment.

Sixth, mother urges that, “[e]ven crediting the [county’s] dubious and inconsistent testing, the evidence reflects, at most, sporadic and low-level [chemical] use insufficient to establish active addiction or an inability to safely parent.” We are not persuaded. The record supports the district court’s finding that mother’s chemical dependency posed a risk of harm to O.M.G. As discussed above, mother attempted to breastfeed O.M.G. while testing positive for methamphetamine. The GAL testified that mother’s continued drug use posed “a huge concern” for O.M.G.’s “overall safety and well-being.” And the parental-capacity assessment reported that an “inability to maintain continued sobriety would negatively affect [mother’s] capacity to parent [O.M.G.] and provide a stable, secure base for him.”

Finally, mother argues that the county presented insufficient evidence that grandmother’s home “pose[d] a risk to the child.” She urges that the county’s concerns regarding mother co-sleeping and smoking in the home were “speculative.” The district court credited the social worker’s testimony that O.M.G. was removed from grandmother’s home because mother did not follow visitation rules. According to the social worker, mother slept overnight at grandmother’s home without the county’s permission, co-slept with O.M.G., and smoked in the same room as O.M.G. We defer to the district court’s credibility determination on this point. *See Kenney*, 963 N.W.2d at 223. Additionally, mother testified that she was exposed to persons who use methamphetamine at

grandmother's home. Thus, the district court did not abuse its discretion in concluding that residing with mother at grandmother's house posed a risk of harm to O.M.G.

The record also supports the district court's conclusion that mother could not provide adequate and safe housing for O.M.G. Mother had moved out of her apartment because she could not pay rent. Despite the presence of drug users, mother moved into grandmother's home. And at the time of trial, mother was unemployed and testified that she lied to a prospective employer who had not yet conducted a background check. This evidence supports the district court's determination that mother did not correct the unstable-housing condition.

In sum, the district court did not abuse its discretion by determining that the conditions leading to O.M.G.'s out-of-home placement were not corrected. Because we affirm this statutory ground for termination, we need not consider mother's arguments about the other three statutory grounds. *See C.K.*, 426 N.W.2d at 847.

II. The district court did not abuse its discretion by determining that the county made reasonable efforts to reunify the family.

Appellate courts review a district court's determination that the county made reasonable efforts to reunify a family for abuse of discretion. *See In re Welfare of Child of D.L.D.*, 865 N.W.2d 315, 322-23 (Minn. App. 2015) (determining that the district court's "reasonable-efforts finding was not an abuse of discretion"), *rev. denied* (Minn. July 21, 2015). Before terminating the rights of a parent to a child, a district court must make "specific findings" *either* that "reasonable efforts to finalize the permanency plan to reunify the child and the parent were made including individualized and explicit findings regarding

the nature and extent of the efforts made by the social services agency to rehabilitate the parent and reunite the family” *or* that “reasonable efforts for reunification are not required.” Minn. Stat. § 260C.301, subd. 8. And the district court “shall consider” whether the services provided were

- (1) selected in collaboration with the child’s family and, if appropriate, the child;
- (2) tailored to the individualized needs of the child and child’s family;
- (3) relevant to the safety, protection, and well-being of the child;
- (4) adequate to meet the individualized needs of the child and family;
- (5) culturally appropriate;
- (6) available and accessible;
- (7) consistent and timely; and
- (8) realistic under the circumstances.

Minn. Stat. § 260.012(h)(1)-(8) (2024). “[W]hat constitutes reasonable efforts depends on the facts of each case.” *J.H.*, 968 N.W.2d at 601 (quotation omitted).

The district court determined that the county made reasonable efforts “to return the child to the parent.” The district court found that the services offered to mother by the county since O.M.G.’s birth included “[t]ransportation, parenting education services, parental capacity testing, early childhood development services, mental-health referrals, chemical-health referral, supervised visits, random drug testing, child-protection case management, and foster care placement.” The district court also determined that

[The county] exercised due diligence to prevent foster care placement and to offer services that were selected in collaboration with the child’s family (and if appropriate, the child), tailored to the individualized needs of the child and the child’s family, relevant to the safety, protection, and well-being of the child, adequate to meet the individualized

needs of the child and family, culturally appropriate, available and accessible, consistent and timely, and realistic under the circumstances to remedy the circumstances requiring the foster care placement and permit reunification.

Mother argues that the district court's findings "are largely conclusory" and do not "sufficiently explain how the services were collaborative, individualized, culturally appropriate, accessible, timely, or realistic as required by [section] 260C.012(h)." For example, mother notes the district court's findings that she had "significant mental-health and chemical-dependency concerns" and that the county provided "mental health referrals." Mother urges that these findings are insufficient because they "do not explain whether therapy appointments were arranged, whether [certain therapy] services were actually available, whether [the county] assisted mother in accessing treatment, whether barriers such as transportation, cost, scheduling, or waitlists existed, or whether the county followed up after referrals were made."

Mother's argument overlooks the district court's findings and the record evidence. The district court found that mother "completed a diagnostic [mental-health] assessment, which did not recommend further services." The district court found that the "reliability of this assessment is questionable because it was based solely on information from mother" and mother demonstrated a "lack of honesty and candor in other areas."

A social worker testified that the parental-capacity assessment recommended that mother receive individual therapy and dialectical behavior therapy (DBT) and that the county sent referrals for those treatments to a provider. The district court found that mother "has not cooperated with recommendations from the parental capacity [assessment] that

are related to mental health, such as individual therapy and DBT.” These specific findings support the district court’s overall determination that the county made reasonable efforts to provide mother with mental-health services.

Mother cites no authority to support her position that section 260.012(h) requires particularized findings for each of its enumerated factors. The statute provides that the district court “*shall consider*” these factors in making its reasonable-efforts determination. Minn. Stat. § 260.012(h) (emphasis added). This is distinct from section 260C.301, subdivision 8, which requires “specific findings” that the county made reasonable efforts, “including individualized and explicit findings regarding the nature and extent of efforts made by [the county] to rehabilitate the parent and reunite the family.” Thus, we conclude that the district court’s findings under section 260.012(h) were sufficient to permit meaningful appellate review of the county’s reunification efforts.⁴

Mother also argues that the county’s efforts to reunify her with O.M.G. were unreasonable. Mother highlights the district court’s findings that she “repeatedly denied methamphetamine use,” that “early assessments did not recommend treatment because [she] minimized her use,” and that she did not receive “meaningful inpatient treatment” until January 2026. Mother suggests that the county did not act “promptly and realistically”

⁴ A recent nonprecedential opinion discusses a similar point about the adequacy of district court findings on services provided. *In re Welfare of Child. of R.T.*, No. A20-1458, 2021 WL 1733363, at *8 (Minn. App. May 2, 2021) (remanding where the district court did not make “*any* findings as to whether the [services provided] were relevant, adequate, culturally appropriate, available, consistent, and timely” (emphasis added)). Nonprecedential opinions may be cited as persuasive authority. Minn. R. Civ. App. P. 136.01, subd. 1(c).

to address her chemical dependency because it relied on “self-report-based assessments despite knowing mother was repeatedly testing positive for methamphetamine.” *See* Minn. Stat. § 260.012(h)(7)-(8) (stating that the district court must consider whether services were “consistent and timely” and “realistic under the circumstances”).

The district court found that mother “had the opportunity to obtain substance-use-disorder assessments” with a counselor in September 2025, but she “was not honest about her [drug] use, and therefore the assessments did not recommend further treatment.” After completing the parental-capacity assessment that same month, “mother did not cooperate in signing a release of information for Project Turnabout.” Mother instead sought treatment at New Life, but “was denied entry” in November 2025 because she “self-reported no use.” After this denial, mother was still “unwilling to sign a release of information to Project Turnabout until January of 2026.”

These findings, which mother does not contest on appeal, support the district court’s determination that the county offered services that were “timely” and “realistic under the circumstances.” The record shows that the county provided mother with multiple resources to assess and address her chemical dependency, but mother was dishonest about her methamphetamine use during at least one of those assessments. When treatment ultimately was recommended, the county referred mother to two inpatient facilities. But mother delayed her treatment by denying drug use and not promptly signing release documents. These facts show that the delay in mother’s treatment was the result of her own actions, not the actions or inactions of the county.

In conclusion, the district court considered the factors enumerated under section 260.012(h) and made sufficient findings for meaningful appellate review. And the district court's findings related to the county's attempts to provide mother with services in a timely and realistic manner are not clearly erroneous. Therefore, the district court did not abuse its discretion by determining that the county made reasonable efforts to reunify the family.

III. The district court did not abuse its discretion by determining that termination of mother's parental rights was in the best interests of O.M.G.

Appellate courts review a district court's determination of "whether termination is in the child's best interests for an abuse of discretion." *J.H.*, 968 N.W.2d at 600. "Determination of a child's best interests is generally not susceptible to an appellate court's global review of a record, because of the credibility determinations involved, and because of the multiple factors that must be weighed." *In re Welfare of M.A.H.*, 839 N.W.2d 730, 744 (Minn. App. 2013) (quotation omitted).

When a statutory ground for termination is present, "the best interests of the child must be the paramount consideration." Minn. Stat. § 260C.301, subd. 7. "The 'best interests of the child' means all relevant factors to be considered and evaluated." Minn. Stat. § 260C.511(a) (2024). Before terminating parental rights, a district court must consider "(1) the child's interest in preserving the parent-child relationship; (2) the parent's interest in preserving the parent-child relationship; and (3) any competing interest of the child." *In re Welfare of Child of W.L.P.*, 678 N.W.2d 703, 711 (Minn. App. 2004) (quotation omitted); see Minn. R. Juv. Prot. P. 58.04(c)(2)(ii) (stating that, when

addressing a child’s best interests in a termination proceeding, the district court “shall analyze” these factors). “Competing interests include health considerations, a stable environment, and the child’s preference.” *In re Welfare of Child of R.V.M.*, 8 N.W.3d 680, 697 (Minn. App. 2024) (quotation omitted), *rev. denied* (Minn. July 19, 2024). And a “parent’s love and desire to care for her children does not outweigh her children’s needs for basic care and adequate nutrition.” *Id.* (quotation omitted); *see* Minn. Stat. § 260C.301, subd. 7 (“Where the interests of parent and child conflict, the interests of the child are paramount.”).

Here, the district court determined that the termination of mother’s parental rights was in O.M.G.’s best interests. The district court found that O.M.G. “is not old enough to express a preference.” The district court also found that mother “loves the child and desires to retain parental rights.” And the district court found that mother “substantially maintained visitation with the child” and that “there is a bond with the child.” The district court, however, found that mother “will not be able to care for the child for the reasonably foreseeable future.” The district court emphasized that mother did not have a job or independent housing and that her “prognosis for sustained recovery was low.” As the district court found, mother “continues to place herself in situations and around people that are actively using [drugs]” and “lacks insight” into her need to find “healthy coping strategies.” The district court ultimately determined that O.M.G.’s need for “a stable, safe, and drug-free environment” outweighed “the preference of mother.”

Mother challenges the district court’s best-interests determination, which we discuss in three parts. First, mother argues that the district court did not explain how her lack of

independent housing and employment supported its best-interests determination. We disagree. The district court found that grandmother's house was "not appropriate for the child" based on mother co-sleeping with O.M.G., mother smoking around O.M.G., and the presence of other drug users in grandmother's home. And mother's unemployment limits her ability to obtain stable, independent housing for O.M.G.

Second, mother contends that the district court did "not address whether the child's need for stability and permanency could be achieved through less-restrictive alternatives to termination."⁵ Mother cites no authority to support her argument that the district court must address less restrictive alternatives to termination in its best-interests analysis. *See Schoepke v. Alexander Smith & Sons Carpet Co.*, 187 N.W.2d 133, 135 (Minn. 1971) (stating that an assignment of error based on "mere assertion" and unsupported by any authority is forfeited "unless prejudicial error is obvious on mere inspection"). And the relevant statute does not require the district court to consider any alternative other than termination so long as clear and convincing evidence establishes one statutory ground for termination, the county made reasonable efforts to reunite the parent and child, and termination is in the child's best interests. Minn. Stat. § 260C.301, subds. 1(b), 7-8; *J.H.*, 968 N.W.2d at 600.⁶

⁵ Mother also argues that her "lack of unsupervised visitation and financial support" for the child "do not meaningfully advance the best-interests analysis." The district court, however, did not appear to consider these facts in reaching its determination.

⁶ This court has rejected a similar argument in a nonprecedential opinion. *See In re Welfare of Child of T.R.*, No. A17-0801, 2017 WL 3977534, at *3 (Minn. App. Sept. 11, 2017) (rejecting parents' argument that a district court must consider less restrictive alternatives to terminating parental rights and declining to analyze those alternatives).

Third, mother argues that “the district court failed to make particularized findings demonstrating that it meaningfully balanced the child’s interest in preserving the parent-child relationship against competing interests” or that “mother will be unable to parent in the ‘reasonably foreseeable future.’” She urges that the district court failed “to account for her current circumstances,” including her “participation in inpatient treatment” and its impact on “her ability to address the issues identified by the [county] and the timeline for potential reunification.”

A district court need not “go into great detail” in its best-interests analysis. *W.L.P.*, 678 N.W.2d at 711 (affirming the district court’s best-interests decision based on W.L.P.’s “history of substance abuse” and the GAL’s opinion that W.L.P. “should have at least two years of demonstrated sobriety” before the child was returned to her). And although mother argues that the district court relied on her child-protection history, we disagree because the district court balanced the three best-interests factors based on current circumstances.

The district court determined that O.M.G. has a bond with mother and that mother desired to retain her parental rights. The district court then weighed these interests in preserving the parent-child relationship against O.M.G.’s competing interests for safety and stability. The district court found that the “interests of the parent and child conflict because the child is in need of a stable, safe, and drug-free environment.” And the district court acknowledged that mother was in substance-abuse treatment but found that “her prognosis for sustained recovery was low.” Based on mother’s housing instability, unemployment, and unresolved chemical-dependency issues, the district court determined

that mother was “unable to provide a stable, safe, and drug-free environment now or in the foreseeable future.”

The record supports the district court’s findings as well as its best-interests determination. The GAL testified that termination of mother’s parental rights was in O.M.G.’s best interests because mother’s positive drug tests posed a risk to O.M.G.’s “overall safety and well-being.” Given the “considerable deference” afforded to the district court’s findings, *R.V.M.*, 8 N.W.3d at 696 (quotation omitted), we conclude that district court did not abuse its discretion in determining that termination was in O.M.G.’s best interests.

Affirmed.