

SUMMARY STATEMENT

Idaho Dep't of Health and Welfare v. Doe

Docket No. 46476

The Idaho Supreme Court affirmed a Lincoln County magistrate court's judgment terminating the parental rights of Jane Doe ("Mother") to her minor children. The children were placed in the custody of the Idaho Department of Health and Welfare (the "Department") following a March 2016 petition under the Child Protection Act. After the filing of the petition, Mother stipulated to an unstable home environment. The court then ordered Mother to follow a case plan provided by the Department. Roughly eight months later, the State filed a motion to terminate Mother's parental rights based on her failure to comply with the case plan. After holding a trial, the court terminated Mother's parental rights.

Mother timely appealed and argued that the Department did not make adequate efforts to reunify the family and that the Court erred by finding that the Department's efforts were reasonable. She also argued that termination was not in the best interests of the children. The Idaho Supreme Court held that inquiry into the Department's efforts at reunification and aiding a parent with a case plan is not statutorily relevant on appeal of the termination of parental rights. The Court also held that Mother failed to show that the trial court's finding that termination of Mother's parental rights was in the best interests of the children was not supported by substantial, competent evidence.