
ORANGE COUNTY SOCIAL SERVICES AGENCY CFS OPERATIONS MANUAL

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Absent Parent Search/Relative Search

Purpose To provide guidelines to search for parents and adult relatives of a child involved in dependency proceedings.

Approved This policy was approved by Gary Taylor, Director of CFS, on April 27, 2016. *Signature on file.*

Most Recent Revision This revision of the Policy and Procedure (P&P):

- Specifies a subsequent search will be initiated when new information becomes available regarding alleged parents
- Clarifies which adult relatives CFS must attempt to identify and locate
- Adds a provision that a *Relative Information List (F063-25-628)* may be submitted to support family finding efforts
- Reminds staff to refrain from including personally identifiable information (PII) on the search declaration
- Provides updated forms to notice incarcerated parents
- Includes two new attachments:
 - Attachment 1—Suggested Guidelines for Relative Notification
 - Attachment 3—Arranging Transportation for Incarcerated Parents

Background Providing timely notice of dependency proceedings is a fundamental constitutional right of procedural due process. For that reason, Children and Family Services (CFS) has created a Search Unit to assist with locating absent parents (i.e., whereabouts unknown) to provide notice of their child's dependency proceedings.

To implement the provisions of Assembly Bill (AB) 938 (2009), Search staff also assist with locating adult relatives of children placed into protective custody, for notification purposes.

Definitions For purposes of this P&P, the following apply:

Due Diligence (for parent searches): As it relates to satisfying the legal requirements for notice of dependency proceedings, acting in a prudent manner to exhaust all reasonable efforts (accessible resources and leads) to locate and notice a parent whose whereabouts are unknown.

Due Diligence (for relative searches): As it relates to completing an investigation to identify, locate, and notify adult relatives of a child placed into protective custody, due diligence may include using Internet search tools to locate relatives

Preliminary Search: An abbreviated search conducted at the time a child is placed into protective custody, to locate parents prior to the Detention/Initial Petition hearing.

Initial Search: A search conducted in due diligence, to locate and notice parents of a (Pretrial/Trial) Jurisdictional/Dispositional hearing (JD hearing).

Subsequent Search: A search conducted in due diligence, to locate and notice a newly identified alleged parent of an upcoming Status Review hearing.

.26 Search: A search conducted in due diligence, to locate and notice parents of a WIC § 366.26 Selection and Implementation hearing (WIC § 366.26 hearing).

Personally Identifiable Information (PII): Information that can be used alone, or in conjunction with any other information, to identify a specific individual (i.e., client). PII includes any information that can be used to search for or identify clients, or can be used to access their files, such as names, Social Security Numbers, dates of birth, driver license numbers or identification card numbers.

POLICY

Parent Searches

In accordance with California Rule of Court 5.534(l), to assist with meeting notice requirements, CFS will conduct the following searches, as needed, for an alleged/presumed/ biological parent whose whereabouts are unknown:

A. **Preliminary Search:**

Pursuant to best practice, Search staff may obtain and review copies of each completed *Application for Petition (F063-28-43)* after a child has been placed into protective custody.

If the whereabouts are unknown of a parent indicated on an *Application for Petition (F063-28-43)*, Search staff will use available case information to conduct a preliminary search for the parent.

Contact information obtained as a result of preliminary search activities will be provided to the Dependency Intake Senior Social Worker (SSW), pursuant to program protocol, no later than noon, one business day following the date the child was placed into protective custody.

B. **Initial Search:**

Pursuant to CFS Policy, if the whereabouts of a parent are unknown at the time of the Detention hearing, Search staff will conduct an initial search for the parent.

To request, the Court Officer will email the *Detention Disposition Sheet (F063-28-18)* to the Search Unit to inform that a search declaration is required for the (Pretrial/Trial) JD hearing. The *Detention Disposition Sheet (F063-28-18)* will include:

- Search efforts ordered by Court
- Date of the Pretrial/Trial hearing(s)

Search staff will review all Detention Hearing Reports and *Detention Disposition Sheets (F063-28-18)* received to check for those in attendance at the hearing. If a parent is not present for the hearing and his/her address is unknown, Search staff will complete an *Absent Parent Search Referral (F063-28-109)*.

Note: The Dependency Investigations SSW is responsible for ensuring an *Absent Parent Search Referral (F063-28-109)* has been completed when an initial search is required. This includes instances when a new alleged parent, whose whereabouts are unknown, is identified during the jurisdictional/dispositional investigation.

C. **Subsequent Search:**

Pursuant to CFS Policy, if a new alleged parent is identified after the JD hearing and his/her whereabouts are unknown, Search staff will conduct a subsequent search.

Note: If an initial search was conducted prior to the JD hearing, and the parent's whereabouts remain unknown, a new search is not required for each Status Review hearing. However, a subsequent search will be conducted for newly identified parents or when new information is obtained regarding the possible whereabouts of an alleged parent.

To request, the assigned SSW will submit an *Absent Parent Search Referral (F063-28-109)* to the Search Unit, along with any *Court/Search Acco (F063-25-1120)*, detailing prior search efforts (if applicable).

The referral will be submitted at the time the new alleged parent is identified and no later than 15 business days prior to the date of the next scheduled Status Review hearing.

D. **.26 Search:**

Pursuant to WIC § 294(f), if a WIC § 366.26 hearing is calendared and the whereabouts of a parent remain unknown, Search staff will conduct a .26 search.

To request, the assigned SSW will submit an *Absent Parent Search Referral (F063-28-109)* to the Search Unit, along with any *Court/Search Acco (F063-25-1120)*, detailing prior search efforts (if applicable).

To meet the requirements for due diligence attempts at notice, and documentation of these efforts for Court, the referral will be submitted within two business days of Court calendaring a WIC § 366.26 hearing (i.e., at the time Family Reunification [FR] services are terminated or an order denying FR services is made) and no later than 30 calendar days prior to the Notice Review.

Note: If an *Absent Parent Search Referral* (*F063-28-109*) is received by the Search Unit, a Search worker may be given secondary assignment in CWS/CMS until the search is completed.

Relative Search

Pursuant to WIC § 309(e), within 30 days of a child being placed into protective custody, CFS will attempt to identify and locate all adult relatives of the child (i.e. grandparents, custodial parents of a sibling of the child, adult siblings, and other adult relatives of the child) for notification purposes (see CFS P&P [Jurisdictional/Dispositional Hearing Report \[G-0310\]](#)).

As part of the relative notification process, Search staff will, as soon as possible but no later than seven calendar days from receipt of a *Resource Family Approval (RFA) Emergency Placement Assessment (EPA) Information Sheet* (*F063-25-773*) or *Relative Information List* (*F063-25-628*), attempt to locate known relatives whose whereabouts are unknown. For further guidelines, refer to [Attachment 1—Suggested Guidelines for Relative Notification](#).

Note: A *Relative Information List* (*F063-25-628*) may be submitted to Search as necessary and appropriate to support family finding efforts (e.g., action item resulting from a Team Decision Making meeting or Permanency Roundtable meeting). Refer to CFS P&P [Maintaining Connections with Important Persons \(D-0410\)](#) for additional guidelines regarding family finding efforts.

Refer to the “Search Efforts” Policy section for a list of available search resources that may be used to locate a relative.

Search Efforts

Pursuant to WIC § 309(e), when conducting a search to locate a parent or relative, Search staff will exercise due diligence, as defined for parent and relative searches, respectively.

Exception: Due diligence efforts are not required for preliminary searches for a parent, given the timeframe within which these searches are conducted.

Refer to [Attachment 2—Search Resources](#) for a listing of available resources which may be used to conduct parent or relative searches.

Per CFS policy, the following search guidelines also apply:

- A. The *Same Name Letter* (*F063-25-486*) may be used when attempting to locate and verify a person’s relationship to the child.

- B. In accordance with CFS P&P [Confidentiality—CFS Client Records \(F-0105\)](#), Search staff will maintain confidentiality in search correspondence sent outside CFS. PII regarding the child, and information regarding dependency action taken on behalf of the child, will not be disclosed.

Note: Use only the forms listed in this P&P for search-related purposes, as the forms included were developed to meet confidentiality requirements.

- C. Search staff will adhere to any orders issued by the Juvenile Court regarding search efforts.

Note: The assigned SSW will inform Search staff of any court orders relevant to Search staff's involvement in the case.

- D. **For parent searches only**, Search staff may attempt field contacts, if appropriate, with consideration to the source of information regarding the parent's possible whereabouts and any Court-ordered search efforts.

Note: Consult Search Supervisor, as needed, regarding appropriateness and feasibility of attempting field contacts.

Searching Online Social Networking Websites

Per CFS policy, the Search Unit may access online social networking websites (e.g., Facebook®, Myspace®, LinkedIn®, Twitter®, etc.) to search for parents and/or relatives.

Note: While use of online social networking websites may serve as a viable search tool, it does not constitute proper legal notice.

When accessing social networking websites for business-related tasks, Search staff will, in accordance with the County Executive Office (CEO) Information Technology P&P [County Social Media Use Policy \(SM-001\)](#):

- A. Use only those county-approved websites outlined in the CEO Information Technology P&P [County Approved Social Media Networks and Standards \(SM-003\)](#).
- B. Sign in to websites using an established and official CFS/Search Unit account. This account will be used strictly for business-related activities, and not for personal use.

If an account has not already been set-up, consult the Search Supervisor and Program Manager (PM) to request an account be created.

- C. Maintain a log of the following, pursuant to program protocol:
- Website(s) accessed
 - Date/Time
 - Name(s) searched

D. Represent Social Services Agency (SSA) in a professional manner and adhere to the same standards, guidelines, and expectations that apply in the performance of assigned duties. See CFS P&P [Standard Operating Procedures \(B-0216\)](#).

E. Not disclose any client record information, including PII and referral/case information that may be used to identify a client. See CFS P&P [Confidentiality—CFS Client Records \(F-0105\)](#).

Note: “Posting” confidential client record information on the Internet is a violation of state law and SSA policy, and may subject an employee to prosecution, personal liability, and/or discipline. “Posting” refers to submitting messages that may include comments and/or links to online information including, but not limited to, websites, video, images, documents, computer applications, etc.

F. When attempting to verify a person’s relationship to the child, send a “private message” or email, incorporating language verbatim from the *Same Name Letter* (F063-25-486).

Note: Given the public nature of social media and the potential for third parties to gain access to information communicated through social media, “posting” messages is prohibited.

Refer to CEO Information Technology P&P [County Social Media Participation Guidelines \(SM-002\)](#) and [Countywide Website & Social Media Policies](#) for detailed guidelines and standards regarding a County employee’s use of social media.

**Communicatin
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Search Efforts**

A. **Assigned SSW:**

During an initial search, subsequent search, or .26 search for a parent, Search staff and the assigned SSW will make best efforts to maintain ongoing communication to ensure:

- Coordination of search efforts
- Consistent and accurate information is used for notice and evidence presented to Court
- Search staff are aware of potential safety concerns

Search staff are encouraged to initiate contact with the assigned SSW at the onset of a parent search to gather information that may be relevant to the search. Following completion of the search, the assigned SSW will be contacted with the results of the search.

The assigned SSW will promptly notify the Search Unit if contact is made with a parent during an active search or if new information becomes available that may assist with locating or establishing contact with the parent.

B. County Counsel:

If a parent's whereabouts become known during a .26 search, and notice through personal service is required but unable to be provided by Search staff, the Search Unit will contact County Counsel to provide location information regarding the parent.

Notice of Hearing

Per CFS policy, if a parent is located or an address reasonably believed to be valid has been obtained, Search staff will provide notice of dependency proceedings, or due diligence attempts at notice, as required by law.

A. Jurisdictional/Dispositional Hearing:

For an initial search, a *Notice of Hearing Letter (F063-28-143)* will be used to notice an absent parent of a (Pretrial/Trial) JD hearing. Pursuant to WIC § 291, notice will:

- Be sent at least 10 days prior to the hearing, whenever possible
- Be sent by certified mail, return receipt requested
- Include a copy of the petition
- Include a *Statement Regarding Parentage (JV-505)* with return envelope if recipient is an alleged parent

Verification that notice was provided will be documented in the declaration of due diligence prepared for the (Pretrial/Trial) JD hearing.

Note: In accordance with Penal Code § 2625, when a parent is incarcerated, the assigned social worker will send a [JV-450 – Order for Prisoner’s Appearance at Hearing Affecting Parental Rights](#) and [JV-451 – Prisoner’s Statement Regarding Appearance at Hearing Affecting Parental Rights](#) to the parent’s facility to apprise the parent of the right to be present or to waive physical appearance. For further guidelines, refer to [Attachment 3—Arranging Transportation for Incarcerated Parents](#).

B. **Status Review Hearings:**

For a subsequent search, an *Absent Parent Letter (F063-28-105)* will be used to notice an absent parent of the next scheduled Status Review hearing. Pursuant to WIC § 293, notice will:

- Be sent not earlier than 30 days or later than 15 days prior to the hearing
- Be sent by certified mail, return receipt requested
- Include a *Statement Regarding Parentage (JV-505)* with return envelope if recipient is an alleged parent who came forward after initial parentage findings were made

Verification that notice was provided will be documented in the declaration of due diligence prepared for the Status Review hearing.

C. **WIC § 366.26 Hearing:**

For a .26 search, the *Notice of Hearing on Selection of a Permanent Plan (JV-300)* will be used to notice an absent parent of a WIC § 366.26 hearing. Pursuant to WIC § 294, notice will be provided regardless of the recommendation and will:

- Be provided at least 60 days prior to the hearing
- Be provided by either:
 - Certified mail, return receipt requested
 - Personal service to the parent, if located during field contact
 - Substitute service (in-person delivery) to a competent person, at least 18 years of age, who resides at the parent’s residence (requires further notice to the parent, by first-class mail)
- Include a *Statement Regarding Parentage (JV-505)* with return envelope if recipient is an alleged parent who came forward after initial parentage findings were made

Verification that notice was provided will be documented via the *Proof of Service Under Section 366.26 of the Welfare and Institutions Code* (JV-310), filed with Court prior to the Notice Review hearing.

To meet the higher standard of legal notice for cases involving a recommendation to terminate parental rights (i.e., Adoption), Court may order notice through the parent's attorney of record or a publication process, after a due diligence finding is made.

Note: In accordance with Penal Code § 2625, when a parent is incarcerated, the assigned social worker will send a [JV-450 – Order for Prisoner’s Appearance at Hearing Affecting Parental Rights](#) and [JV-451 – Prisoner’s Statement Regarding Appearance at Hearing Affecting Parental Rights](#) to the parent's facility to apprise the parent of the right to be present or to waive physical appearance. For further guidelines, refer to [Attachment 3—Arranging Transportation for Incarcerated Parents](#).

Declaration of Due Diligence

Pursuant to CFS policy, following an initial search or subsequent search, evidence of due diligence will be provided to Court in the form of a declaration of due diligence. Pursuant to WIC 294(f), a declaration of due diligence will also be provided to Court following a .26 search.

Exception: For .26 searches only, if a parent is located and notice is served in person through County Counsel, a declaration of due diligence may not be required. Consult Search Supervisor for direction.

The declaration of due diligence will be:

- A. Created and saved in CWS/CMS, pursuant to program protocol, and include:
 - All search activities completed and the results of those activities
 - An indication as to whether notice was provided
 - Specify date and method of service (e.g., certified mail, personal service, etc.)
 - Documentation that a *Statement Regarding Parentage* (JV-505) was included with notice provided to alleged parents
 - Any statements regarding allegations of paternity

obtained during parent interviews (see CFS P&P [Parentage \[G-0602\]](#))

- All addresses used to notice the parent (i.e., address summary)

Do not include PII on the search declaration, as Court will reject any documents containing PII.

Note: Additional guidelines apply if the search declaration is prepared for a safely surrendered baby case. See Policy section in CFS P&P [Safely Surrendered Babies \(A-0409\)](#).

- B. Prepared and signed, under penalty of perjury, by the Search worker who conducted the search.
- C. Submitted to the Court Typist by the clerical deadline, no later than noon, one business day prior to the scheduled hearing date.
- D. E-filed with the Juvenile Court, as follows:
 - For an initial search or subsequent search, the declaration of due diligence will be e-filed at least one business day prior to the scheduled hearing date
 - For a .26 search, the declaration of due diligence will be e-filed at least one business day prior to the Notice Review hearing

For guidelines regarding e-filing court report documents, including use of e-signatures, refer to CFS P&P [Electronic Signing and Filing of Court Reports \(B-0217\)](#).

Note: Any completed and returned *Statement Regarding Parentage (JV-505)* will be forwarded to the Court Officer for consideration by Court at the scheduled hearing.

- E. Provided to County Counsel by the Court Officer, on the scheduled hearing date.
- Note:** The Court Typist will prepare and forward two copies of the declaration of due diligence to the Court Officers Unit for distribution at Court.
- F. Filed in accordance with CFS P&P [Referral and Case Filing \(E-0102\)](#):

- On the *Court/Search Acco (F063-25-1120)*, for inclusion in the child's Service Folder
- On the right side of the child's Legal File

Documentation Search activities completed during an initial search, subsequent search, or .26 search for a parent, will be documented by Search staff as indicated below.

Relative search efforts will be documented on the *Relative Information List (F063-25-628)* or *RFA EPA Information Sheet (F063-25-773)*. Refer to [Attachment 1—Suggested Guidelines for Relative Notification](#) for further guidelines.

A. **Absent Parent Checklist:**

Search activities completed and responses received may be recorded on the *Search for Absent Parent Checklist (F063-28-109A)*.

B. **CWS/CMS:**

The declaration of due diligence will be saved as a document in the child's CWS/CMS case.

C. **Court/Search Acco:**

Supporting documentation of search efforts will be filed on the *Court/Search Acco (F063-25-1120)*, including but not limited to:

- Copies of all letters and notices mailed, as well as forms used to document search activities (e.g., *Search for Absent Parent Checklist [F063-28-109A]*)
- Clearance results obtained from any CLETS screening, database, or internet search
- Documentation of unsuccessful attempts (letters and notices returned unopened and undeliverable)
- A copy of the declaration of due diligence (placed at the top of the *Court/Search Acco [F063-25-1120]*)

Following completion of the search, the *Court/Search Acco (F063-25-1120)* will be forwarded to the assigned SSW for inclusion in the child's Service Folder.

Note: After forwarding the *Court/Search Acco (F063-25-1120)* to the assigned SSW, any letters and notices returned unopened and undeliverable will be forwarded to the assigned SSW for filing.

REFERENCES

Attachments and CWS/CMS Data Entry Standards	Hyperlinks are provided below to access attachments to this P&P and any CWS/CMS Data Entry Standards that are referenced.
	<ul style="list-style-type: none">• Attachment 1—Suggested Guidelines for Relative Notification• Attachment 2—Search Resources• Attachment 3—Arranging Transportation for Incarcerated Parents• CWS/CMS Data Entry Standards—Relative Notifications• CWS/CMS Data Entry Standards—Creating Collaterals
Hyperlinks	Users accessing this document by computer may create a direct connection to the following references by clicking on them.
	<ul style="list-style-type: none">• CFS P&P Birth Certificates: Foster Child (D-0401)• CFS P&P CLETS (B-0116)• CFS P&P Confidentiality—CFS Client Records (F-0105)• CFS P&P Notices of Hearing (G-0507)• CFS P&P Jurisdictional/Dispositional Hearing Report (G-0310)• CFS P&P Maintaining Connections with Important Persons (D-0410)• CFS P&P Parentage (G-0602)• CFS P&P Safely Surrendered Babies (A-0409)
Other Sources	Other printed references include the following: None.

FORMS

Online Forms	Forms listed below may be printed out and completed, or completed online, and may be accessed by clicking on the link provided.				
	<table><thead><tr><th>Form Name</th><th>Form Number</th></tr></thead><tbody><tr><td>Fax Cover Sheet for Criminal Clearances (CII)</td><td>F063-28-306</td></tr></tbody></table>	Form Name	Form Number	Fax Cover Sheet for Criminal Clearances (CII)	F063-28-306
Form Name	Form Number				
Fax Cover Sheet for Criminal Clearances (CII)	F063-28-306				

Field Worksheet	F063-04-36
Absent Parent Search Referral	F063-28-109
Search for Absent Parent Checklist	F063-28-109A
Postal Clearance	F063-28-103
Employer Letter	F063-28-101
Sheriff Letter	F063-28-102
Consulate Letter	F063-25-487
Same Name Letter	F063-25-486
Same Name Letter (Spanish)	F063-25-486Sp
Absent Parent Letter	F063-28-105
Absent Parent Letter (Spanish)	F063-28-105Sp
Relative Letter	F063-28-107
Relative Letter (Spanish)	F063-28-107Sp
Relative Information List	F063-25-628
Relative Notification Letter	F063-25-627
Relative Notification Letter (Spanish)	F063-25-627Sp
Relative Notification Letter (Vietnamese)	F063-25-627VN
RFA Emergency Placement Assessment Information Sheet	F063-25-773
Application for Petition	F063-28-43
Detention Disposition Sheet	F063-28-18
Relative Information	JV-285
Confidential Information	JV-287
Transportation Order Request	F063-25-460
Notice of Hearing Letter	F063-28-143
Notice of Hearing Letter (Spanish)	F063-28-143Sp
Notice of Hearing on Selection of a Permanent Plan	JV-300
Notice of Hearing on Selection of a Permanent Plan (Spanish)	JV-300 S
Proof of Service Under Section 366.26 of the Welfare and Institutions Code	JV-310

Hard Copy Forms

Forms that may be completed in hard copy (including multi-copy NCR forms) are listed below. **For reference purposes only**, links are provided to view these hard copy forms, where available.

Form Name	Form Number
Statement Regarding Parentage	JV-505
Statement Regarding Parentage (Spanish)	JV-505 S
Court/Search Acco	F063-25-1120

CWS/CMS Forms Forms that may **only** be obtained in CWS/CMS are listed below. **For reference purposes only**, links are provided to view these CWS/CMS forms, where available.

Form Name	Form Number
None.	
<u>Order for Prisoner's Appearance at Hearing Affecting Parental Rights</u>	JV-450
<u>Prisoner's Statement Regarding Appearance at Hearing Affecting Parental Rights</u>	JV-451

Brochures Brochures to distribute in conjunction with this policy may include:

Brochure Name	Brochure Number
None.	

LEGAL MANDATES

[Welfare and Institutions Code \(WIC\) Sections \(§§\) 290.1–297](#) provide notice requirements for all parties related to dependency proceedings.

[Welfare and Institutions Code § 309\(e\)](#), [All County Letter \(ACL\) 09-86](#), and [ACL 16-16](#) provide that within 30 days of a child being placed into protective custody, an investigation be completed, in due diligence, to identify and locate all adult relatives of the child, for notification purposes.

[Welfare and Institutions Code § 316.2](#) provides that Judicial Council form *Statement Regarding Parentage* (JV-505) be included with the notice of hearing provided to all alleged parents.

[Welfare and Institutions Code § 11478.1](#) authorizes the California Parent Locator Service and Central Registry to release an absent parent or relative's social security number, most recent address, and place of employment to child welfare agencies.

[Welfare and Institutions Code § 16504.5](#) gives child welfare agencies access to state summary criminal history information via the California Law Enforcement Telecommunications System (CLETS) to locate an absent parent/guardian.

[Family Code §§ 17212](#) and [17506](#) authorize the California Parent Locator Service and Central Registry to release relevant contact information regarding a parent and relative to child welfare agencies for the purposes of identifying, locating, and notifying parents

of children involved in juvenile dependency proceedings, establishing paternity, and assessing the appropriateness of placement with a non-custodial parent.

[Code of Civil Procedure § 2015.5](#) provides the language for signing under penalty of perjury as to the truth of a declaration submitted to Court.

[Penal Code § 2625](#) gives the notice requirements for parents who are incarcerated in a state prison or county jail, in custody of the California Rehabilitation Center or Youth Authority, or are confined in a state hospital or other facility due to a court finding them insane at the time of committing a criminal offense

[ACL 14-75](#) details authorization for child welfare agencies to request information from the Federal Parent Locator Service when attempting to locate non-custodial parents and relatives.

California Rules of Court [5.534\(f\)](#) provides that a *Relative Information* (JV-285) and *Confidential Information* (JV-287) be provided to relatives.

California Rules of Court [5.534\(l\)](#) provides that at each dependency hearing, Court determine whether notice was provided, as required by law.

California Rules of Court [5.695\(f\) and \(g\)](#) provide that at the Dispositional hearing, Court consider whether an investigation was completed in due diligence to identify and locate all adult relatives of the child, for notification purposes.

Paul H. (2003) 111 Cal. App. 4th 753 reversed a Sacramento County court order to terminate parental rights because of failure to serve father with JV-505, which allows him to indicate his position about paternity.

Wilford J. (2005) 131 Cal. App. 4th 742 directs that parents must be advised of the nature of the hearing to consider the notice of hearing adequate.

DeJohn B. (2000) 84 Cal. App. 4th 100, 106 directs that notice must be given to parents at each step of dependency proceedings, until their parental rights have been terminated.

Claudia S. (2005) 131 Cal. App. 4th 236, 247 directs notice to parents for due process purposes, affording them an opportunity to present their objections.

J.H. (2007) 158 Cal. App. 4th 174 summarizes that if reasonable efforts are made to locate a missing parent through systematic investigation and inquiry conducted in good faith, failure to give notice will not render dependency proceedings invalid.