

IN THE COURT OF APPEALS OF OHIO
SECOND APPELLATE DISTRICT
GREENE COUNTY

IN RE: E.V.

:
: C.A. No. 2026-CA-27
:
: Trial Court Case No. 2023-C-00075
:
: (Appeal from Common Pleas Court-
: Juvenile Division)
:
: **FINAL JUDGMENT ENTRY &**
: **OPINION**

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Pursuant to the opinion of this court rendered on September 25, 2026, the judgment of the trial court is affirmed.

Costs to be paid as stated in App.R. 24.

Pursuant to Ohio App.R. 30(A), the clerk of the court of appeals shall immediately send a copy of the court's ruling to each party and note that action on the docket. Additionally, pursuant to App.R. 27, the clerk of the court of appeals shall send a certified copy of this judgment, which constitutes a mandate, to the clerk of the trial court and note the service on the appellate docket.

For the court,

A handwritten signature in black ink, appearing to read "TG Hanseman", written over a horizontal line.

ROBERT G. HANSEMAN, JUDGE

TUCKER, J., and EPLEY, J., concur.

OPINION
GREENE C.A. No. 2026-CA-27

ROBERT L. SCOTT, Attorney for Appellant, Father
MEGAN A. HAMMOND, Attorney for Appellee Greene County Children Services
GARY C. SCHAENGOLD, Attorney for Appellee Mother

HANSEMAN, J.

{¶ 1} Father appeals from the judgment of the Juvenile Division of the Greene County Common Pleas Court that granted permanent custody of his child, E.V., to Greene County Children Services (“GCCS”). Father challenges the manifest weight of the evidence underlying the judgment. He argues that the trial court’s statutory findings were not supported by clear and convincing evidence that permanent custody was in E.V.’s best interests. Father also claims that the trial court failed to consider less restrictive alternatives to permanent custody or that a legally secure permanent placement could be achieved without granting permanent custody to GCCS. Finally, Father argues that GCCS failed to prove reasonable efforts of reunification had been attempted. For the reasons that follow, the judgment of the juvenile court is affirmed.

I. Facts and Course of Proceedings

{¶ 2} In December 2010, E.V. was born to Father and Mother, who were unmarried. Over the course of E.V.’s early childhood, she resided separately with Mother, maternal relatives, and Father. By the time E.V. was eleven years old, she was residing with Father. However, in 2021 Father became homeless. At that time, Father appeared at the home of E.V.’s paternal aunt to live with E.V. Later the same year, Father left, leaving E.V. in her aunt’s care. E.V.’s aunt gained custody of E.V., and E.V. lived with her aunt and uncle and their four children, E.V.’s cousins.

{¶ 3} On October 5, 2023, GCCS received a sex abuse complaint regarding E.V. and an older cousin residing in aunt's home. After a behavioral incident in October 2023, E.V. was removed from the home, and GCCS took emergency custody. GCCS filed a dependency complaint on October 26, 2023. The juvenile court adjudicated E.V. as a dependent child on November 9, 2023, and granted GCCS temporary custody.

{¶ 4} GCCS first placed E.V. in a group home in Dayton, Ohio, where E.V. remained until June 2024. E.V. was discharged from the group home and placed in a more secure residential treatment facility in Berea, Ohio. E.V. resided in the Berea residential treatment facility from June 2024 through April 2025. Following the recommendation of treatment providers, E.V. was placed in a second secure residential treatment facility in the State of Arkansas in April 2025.

{¶ 5} Regarding Father, at the time E.V. was placed in the first group home in Dayton, Father continued to be homeless. Yet he wanted custody of E.V. and agreed to work with GCCS. GCCS created a case plan for Father that required him to obtain housing and employment, complete a mental health and drug and alcohol assessment, follow any recommendations for treatment, attend monthly meetings with GCCS, and attend weekly two-hour supervised visits with E.V.

{¶ 6} Mother did not participate in a case plan with GCCS to gain custody of E.V. because of her marriage to a registered sex offender. GCCS attempted to find other relatives who could care for E.V., but it could not find an appropriate relative for placement. GCCS attempted to work with Father and obtained two extensions of temporary custody of E.V. On September 19, 2025, GCCS filed for permanent custody of E.V.

{¶ 7} The juvenile court held a hearing on January 13, 2026. By that time, E.V. was 15 years old. At the hearing, E.V. appeared virtually from Arkansas and made a statement

to the juvenile court that she wished to live with Father. E.V.'s two caseworkers testified, and E.V.'s court-appointed special advocate ("CASA") presented her oral recommendation, standing on her written reports that GCCS should be awarded permanent custody. Father testified at the hearing regarding his efforts at complying with his case plan and securing housing and employment. Besides himself as a placement option for E.V., Father also requested that his fiancée or his fiancée's parents take legal custody. Neither the fiancée nor the fiancée's parents had filed a motion for legal custody, though.

{¶ 8} While Mother did not seek custody of E.V., she attended the hearing and did not oppose Father's arguments regarding custody. Mother informed the juvenile court that E.V.'s maternal grandmother might be a possible placement for E.V. Though the maternal grandmother also appeared for the hearing, she did not testify or file a motion for legal custody. Maternal grandmother had also failed to return phone calls from GCCS during the time GCCS had temporary custody.

{¶ 9} On January 21, 2026, the juvenile court rendered its decision on the permanent custody of E.V. The court found that E.V. had been in the temporary custody of GCCS for more than 12 months out of a consecutive 22-month time period. The juvenile court applied each factor in R.C. 2151.414(B)(1)(d) and found that E.V.'s best interests would be served by granting GCCS permanent custody. The juvenile court further found that GCCS had made reasonable efforts to reunify E.V. with her family before the termination of Mother's and Father's parental rights. Father timely appealed.

{¶ 10} In his appeal, Father asserts the following five related assignments of error:

(1) THE TRIAL COURT ERRED IN GRANTING PERMANENT CUSTODY WHERE THE AGENCY FAILED TO ESTABLISH BY CLEAR AND

CONVINCING EVIDENCE THAT PERMANENT CUSTODY WAS IN THE CHILD'S BEST INTERESTS PURSUANT TO R.C. 2151.414(D).

(2) THE TRIAL COURT'S DECISION GRANTING PERMANENT CUSTODY WAS AGAINST THE MANIFEST WEIGHT OF THE EVIDENCE.

(3) THE TRIAL COURT ERRED BY FAILING TO ADEQUATELY CONSIDER LESS RESTRICTIVE ALTERNATIVES TO PERMANENT CUSTODY.

(4) THE AGENCY FAILED TO PROVE THAT REASONABLE EFFORTS AT REUNIFICATION WERE SUFFICIENTLY MADE PURSUANT TO R.C. 2151.419.

(5) THE TRIAL COURT'S FINDING THAT A LEGALLY SECURE PERMANENT PLACEMENT COULD NOT BE ACHIEVED WITHOUT A GRANT OF PERMANENT CUSTODY WAS NOT SUPPORTED BY CLEAR AND CONVINCING EVIDENCE.

II. Analysis

Standard of Review

{¶ 11} An appellate court applies the sufficiency-of-the-evidence and/or manifest-weight-of-the-evidence standards, as applicable, in reviewing a juvenile court's decision awarding permanent custody of a child and terminating parental rights under R.C. 2151.414. *In re Z.C.*, 2023-Ohio-4703, ¶ 18. The sufficiency of the evidence and manifest weight of the evidence standards are "distinct concepts and are "both quantitatively and qualitatively different."" *Id.* at ¶ 13, quoting *Eastley v. Volkman*, 2012-Ohio-2179, ¶ 10, quoting *State v. Thompkins*, 78 Ohio St.3d 380, 386 (1997), paragraph two of the syllabus. The sufficiency of the evidence standard is a "test of adequacy," whereas "weight of the evidence "is not a

question of mathematics, but depends on its *effect in inducing belief.*”” (Emphasis in original.) *Id.*, quoting *Thompkins* at 386-387, quoting *Black’s Law Dictionary* (6th Ed. 1990).

{¶ 12} “Whether the evidence is legally sufficient to sustain a verdict is a question of law.” *Id.*, quoting *Thompkins* at 386. “When applying a sufficiency-of-the-evidence standard, a court of appeals should affirm a trial court when the evidence is legally sufficient to support the jury verdict [or trial court’s decision] as a matter of law.” (Cleaned up.) *Id.*

{¶ 13} “But ‘even if a trial court judgment is sustained by sufficient evidence, an appellate court may nevertheless conclude that the judgment is against the manifest weight of the evidence.’” Z.C. at ¶ 14, quoting *Eastley* at ¶ 12. “When reviewing for manifest weight, the appellate court must weigh the evidence and all reasonable inferences, consider the credibility of the witnesses, and determine whether, in resolving conflicts in the evidence, the finder of fact clearly lost its way and created such a manifest miscarriage of justice that the judgment must be reversed and a new trial ordered.” *Id.* “In weighing the evidence, the court of appeals must always be mindful of the presumption in favor of the finder of fact.” *Id.*, quoting *Eastley* at ¶ 21.

Permanent Custody Under R.C. 2151.414

{¶ 14} We acknowledge that a parent has a “fundamental liberty interest” in the care, custody, and management of his or her child and an “essential” and “basic civil right” to raise his or her children. *Santosky v. Kramer*, 455 U.S. 745, 753 (1982); *In re Murray*, 52 Ohio St.3d 155, 157 (1990); accord *In re D.A.*, 2007-Ohio-1105, ¶ 8-9. However, a parent’s fundamental rights are not absolute. *D.A.* at ¶ 11. Rather, “it is plain that the natural rights of a parent . . . are always subject to the ultimate welfare of the child, which is the polestar or controlling principle to be observed.” *In re Cunningham*, 59 Ohio St.2d 100, 106 (1979),

quoting *In re R.J.C.*, 300 So.2d 54, 58 (Fla.App. 1974). Thus, the state may terminate parental rights when a child's best interest demands such termination. *D.A.* at ¶ 11.

{¶ 15} R.C. 2151.414 governs the termination of parental rights in Ohio. "[I]f a child has been in the temporary custody of one or more public children services agencies or private child placing agencies for twelve or more months of a consecutive twenty-two-month period, the agency with custody shall file a motion requesting permanent custody of the child." R.C. 2151.413(D)(1). After a hearing, trial courts must apply the two-part test outlined in R.C. 2151.414(B)(1) to determine whether to grant a motion for permanent custody to a public children services agency. The statute requires the trial court to find, by clear and convincing evidence, that (1) any one of the factors enumerated in R.C. 2151.414(B)(1)(a) through (e) exist and that (2) an award of permanent custody to the agency is in the best interest of the child. R.C. 2151.414(B)(1).

{¶ 16} "Clear and convincing evidence is that measure or degree of proof which is more than a mere 'preponderance of the evidence,' but not to the extent of such certainty as is required 'beyond a reasonable doubt' in criminal cases, and which will produce in the mind of the trier of facts a firm belief or conviction as to the facts sought to be established." *Cross v. Ledford*, 161 Ohio St. 469 (1954), paragraph three of the syllabus.

Factors of R.C. 2151.414(B)(1)(a) Through (e)

{¶ 17} With regard to the factors under (a) through (e) of R.C. 2151.414(B)(1), the court must find by clear and convincing evidence that the child either (a) cannot or should not be placed with either parent within a reasonable period of time; (b) is abandoned; (c) is orphaned and no relatives are able to take permanent custody of the child; (d) has been in the temporary custody of one or more public or private children services agencies for 12 or more months of a consecutive 22-month period; or (e) the child or another child in the

custody of the parent or parents from whose custody the child has been removed has been adjudicated an abused, neglected, or dependent child on three separate occasions by any court in this state or another state. R.C. 2151.414(B)(1)(a) through (e).

{¶ 18} Of relevance here, applying R.C. 2151.414(B)(1)(d), the juvenile court found clear and convincing evidence that E.V. had been in the temporary custody of GCCS for 12 or more months of a consecutive 22-month period. Because E.V. was in GCCS's temporary custody from November 9, 2023, (date of dependency adjudication) to January 13, 2026, (date of permanent custody hearing), the record sufficiently demonstrates that E.V. was in GCCS's custody 12 or more months of a consecutive 22-month period. *In re N.M.P.*, 2020-Ohio-1458, ¶ 22. That is all that is required. *Id.* Father does not dispute this factor on appeal.

Best Interest Factors Under R.C. 2151.414(D)(1)

{¶ 19} Father does dispute the juvenile court's determination that it was in E.V.'s best interest to have permanent custody granted to GCCS. When making the best-interest determination, R.C. 2151.414(D)(1) provides the following factors for the trial court to consider:

- (a) The interaction and interrelationship of the child with the child's parents, siblings, relatives, foster caregivers and out-of-home providers, and any other person who may significantly affect the child;
- (b) The wishes of the child, as expressed directly by the child or through the child's guardian ad litem, with due regard for the maturity of the child;
- (c) The custodial history of the child . . . ;

(d) The child's need for a legally secure permanent placement and whether that type of placement can be achieved without a grant of permanent custody to the agency;

(e) Whether any of the factors in divisions (E)(7) to (11) of R.C. 2151.414 apply in relation to the parents and child.

{¶ 20} “[A] court must consider “all relevant factors,” including [the] five enumerated statutory factors No one element is given greater weight or heightened significance.” *In re A.W.*, 2025-Ohio-5657, ¶ 53 (2d Dist.), quoting *In re C.F.*, 2007-Ohio-1104, ¶ 57, quoting *In re Schaefer*, 2006-Ohio-5513, ¶ 56.

R.C. 2151.414(D)(1)(a) – Interactions and Relationships of the Child

{¶ 21} The first factor in determining whether permanent custody is in a child's best interest requires a juvenile court to examine the child's interactions and relationships with the child's parents, siblings, foster caregivers, and others. R.C. 2151.414(D)(1)(a). Here the juvenile court considered E.V.'s relationships with Father, Mother, three older siblings, maternal grandmother, paternal grandmother, paternal aunt and uncle, and Father's fiancée's parents. The court noted that none of these relatives were possible placement options for E.V.

{¶ 22} Mother rendered herself ineligible as a placement option for E.V. because she resided with a registered sex offender, her husband. Maternal grandmother did not respond to GCCS's phone calls regarding placement or file a motion for legal custody of E.V.

{¶ 23} While the juvenile court considered that both Father and E.V. desired to be reunited and were bonded, the juvenile court also had evidence that Father had not resided with E.V. since 2021 and continued to be homeless.

{¶ 24} Paternal aunt and uncle could not take custody of E.V. because of sex abuse allegations regarding E.V. and their son. Paternal grandmother was unable to take custody because of her age and need to meet her husband’s daily physical and medical needs. E.V.’s three older siblings were all interviewed by GCCS. Though each expressed wanting a relationship, none were able to take custody of E.V.

{¶ 25} Father’s fiancée and her parents were suggested as placement options for E.V. But none had filed motions for legal custody of E.V. The juvenile court found that the fiancée lived with Father at a homeless shelter and that her parents had never met the child.

R.C. 2151.414(D)(1)(b) – Wishes of the Child

{¶ 26} The second factor in determining whether permanent custody is in a child’s best interest requires a juvenile court to examine the child’s wishes. R.C. 2151.414(D)(1)(b). The juvenile court considered E.V.’s statement at the hearing. The court noted that E.V.’s wishes—as expressed by her at the January 2026 hearing, her appointed attorney, and her CASA—confirmed that E.V. wanted to return to Father.

{¶ 27} The juvenile court also noted evidence that, in 2025, E.V. had expressed that she had no objection to GCCS obtaining permanent custody. The juvenile court also heard testimony from a GCCS caseworker that, in the fall of 2025, E.V. had stated that she felt Father was giving her “false hope” by making promises to her that he could not keep regarding her future with him.

R.C. 2151.414(D)(1)(c) – Custodial History

{¶ 28} The third factor in determining whether permanent custody is in a child’s best interest requires a juvenile court to examine the custodial history of the child. R.C. 2151.414(D)(1)(c). Regarding this factor, the juvenile court had evidence that E.V. was

in the custody of paternal aunt and uncle in 2021. From October 2023 to January 2026, E.V. was in the temporary custody of GCCS.

{¶ 29} As for E.V.'s placements while she was in GCCS's temporary custody, the juvenile court found that E.V. resided in a group home in Dayton between October 2023 to June 2024. From June 2024 through April 2025, E.V. resided in a secure residential treatment facility. Then from April 2025 to the January 2026 hearing, E.V. stayed in a second secure residential treatment facility in Arkansas. It was undisputed that though E.V. and Father were bonded, E.V. had not lived with Father since 2021.

R.C. 2151.414(D)(1)(d) – Legally Secure Permanent Placement

{¶ 30} The fourth factor in determining whether permanent custody is in a child's best interest requires a juvenile court to examine the child's need for a legally secure permanent placement and whether that type of placement can be achieved without a grant of permanent custody to the agency. R.C. 2151.414(D)(1)(d).

{¶ 31} While the phrase "legally secure permanent placement" is not defined in the Revised Code, courts generally interpret the phrase to mean "a safe, stable, consistent environment where a child's needs will be met." *In re Z.A.*, 2025-Ohio-5247, ¶ 23 (2d Dist.), quoting *In re K.M.*, 2023-Ohio-3203, ¶ 35 (4th Dist.). A legally secure permanent placement has also been described as "more than a house with four walls" and "generally encompasses a stable environment where a child will live in safety with one or more dependable adults who will provide for the child's needs." *In re M.B.*, 2016-Ohio-793, ¶ 56 (4th Dist.).

{¶ 32} In this case, the juvenile court specifically found clear and convincing evidence that a legally secure permanent placement for E.V. could not be achieved without a grant of permanent custody to GCCS. The court considered Father's history of homelessness and

housing issues and concluded that E.V. could not be reunited with Father at the time, in part, because of his “own treatment needs, housing and financial instability.”

{¶ 33} The record supports the juvenile court’s conclusion. Father testified that he lived in Sidney, Ohio, and that for the past two months he had been staying at a mission house, an emergency shelter for families. Prior to residing at the shelter, Father had resided at a counseling center in Portsmouth, Ohio, and at a different residential treatment center before the one in Portsmouth. Father had a history of housing instability going back to 2021, during which he had resided in his car, hotels, and in parks and tents throughout Dayton, Ohio. Though Father indicated that he had the option to reside with his fiancée’s parents, he was living with his fiancée at the emergency shelter in Sidney at the time of the January 2026 hearing.

{¶ 34} In addition to Father’s unstable housing, he had a history of unemployment that dated back to 2021. At the time of the hearing, Father had obtained employment through a temporary service agency. But as noted by the juvenile court, that occurred mere weeks before the hearing. Further, GCCS provided Father with bus passes to assist him in finding employment and attending job interviews, but he remained unemployed from 2023 to 2025. The record also indicates that though Father tested negative for illegal drugs in the months of September, October, and November 2025, he had a positive test result in December 2025 for methamphetamine, amphetamine, and alcohol—notwithstanding his testimony that he had been in treatment for approximately six months before the positive test result.

{¶ 35} In addition to Father’s overall instability, E.V.’s CASA testified (consistent with her reports) that E.V. needed a strong structured environment to address her ongoing emotional, behavioral, and psychological challenges. The hearing record indicates that E.V. had engaged in delinquent behavior, such as running away. E.V. had also threatened or

actively exhibited self-harming behaviors. In the CASA's opinion, Father, because of his instability, would not be able to provide ongoing support and structure consistent with E.V.'s daily mental and emotional needs.

{¶ 36} Aside from challenging the juvenile court's analysis of the best interest factors, Father argues that GCCS failed to present evidence that E.V.'s circumstances would meaningfully improve in GCCS's permanent custody. Evidence adduced at the hearing demonstrated that E.V. would likely be discharged from the Arkansas treatment facility in Spring 2026 and that her next placement was undetermined. The record shows that E.V.'s adoption prospects were unknown or unlikely considering her age and her mental, emotional, and behavioral issues. Given these facts, Father contends that the juvenile court erred by finding that a permanent placement could not be achieved without granting permanent custody to GCCS. However, juvenile courts are not required to factor adoption possibilities or the child's prospects at foster homes, housing, or group homes in its analysis. *In re T.R.*, 2008-Ohio-5219, ¶ 16.

R.C. 2151.414(D)(1)(e) – (E)(7) to (11) Factors

{¶ 37} "The factors in R.C. 2151.414(E)(7) through (11), which are referred to in R.C. 2151.414(D)(1)(e), involve a parent's having been convicted of or pleaded guilty to specific criminal offenses against the child, the child's sibling or another child who lived in the parent's household; a parent's withholding medical treatment or food from the child; a parent's repeatedly placing the child at substantial risk of harm because of alcohol or drug abuse; a parent's abandoning the child; and a parent's having had parental rights as to the child's sibling involuntarily terminated." *In re A.M.*, 2020-Ohio-5102, ¶ 19.

{¶ 38} The juvenile court determined that none of these factors applied. Therefore, we do not need to address them.

Less Restrictive Alternatives to Permanent Custody

{¶ 39} The best interest factors listed in R.C. 2151.414(D)(1) are not an exhaustive list, so juvenile courts may consider any other relevant factor in addition to the factors listed. *A.M.* at ¶ 19; R.C. 2151.414(D)(1) (“the court shall consider all relevant factors, including, but not limited to . . .”). One of the other relevant factors may be, as Father suggests, a less restrictive alternative to an award of permanent custody.

{¶ 40} Father argues that less restrictive alternatives should have been considered by the juvenile court instead of the most severe disposition of terminating his parental rights. Father contends that the juvenile court should have considered continued temporary custody to GCCS, legal custody to other extended relatives, such as Father’s fiancée or E.V.’s maternal grandmother, or a planned permanent living arrangement. However, we disagree.

{¶ 41} By the time the juvenile court held its hearing on January 13, 2026, it had already granted GCCS two extensions of temporary custody. The juvenile court was not authorized to grant any further extensions because it had exhausted the maximum number allowed—two. Juvenile courts are statutorily limited to two extensions of temporary custody. Juv.R. 14(B); R.C. 2151.353(G) (“the court shall not order an existing temporary custody order to continue beyond two years after the date on which the complaint was filed or the child was first placed into shelter care, whichever date is earlier, regardless of whether any extensions have been previously ordered pursuant to division (D) of section 2151.415 of the Revised Code.”); R.C. 2151.415(D)(4) (“No court shall grant an agency more than two extensions of temporary custody pursuant to division (D) of this section and the court shall not order an existing temporary custody order to continue beyond two years after the date on which the complaint was filed . . .”).

{¶ 42} Regarding the grant of legal custody to Father's fiancée, maternal grandmother, or another relative, the juvenile court was not authorized to consider any of them because none of them had filed a motion for legal custody before the hearing. *In re Grooms*, 2004-Ohio-6782, ¶ 22 (2d Dist.); *In re A.K.-R.N.*, 2023-Ohio-4172, ¶ 18 (12th Dist.); *In re Perez*, 135 Ohio App.3d 494, 497 (9th Dist. 1999); R.C. 2151.353(A)(3) (the person who wishes to have legal custody must file a motion prior to the dispositional hearing).

{¶ 43} A planned permanent living arrangement was also not available to the juvenile court as a less restrictive alternative because E.V. was 15 years old. A child must be at least 16 years old to be ordered into a planned permanent living arrangement. R.C. 2151.353(A)(3)(d)(5) (court may place a child in a planned permanent living arrangement "if the court finds, by clear and convincing evidence, that a planned permanent living arrangement is in the best interest of the child, that the child is sixteen years of age or older, and that one of the following [statutory factors] exists"); Juv.R. 34(D)(5).

{¶ 44} In sum, on review of all of the relevant best interests of the child factors before the juvenile court in this case, we conclude that there is competent, credible evidence upon which the juvenile court reasonably could have determined with a firm belief that E.V.'s best interests were served by an award of permanent custody to GCCS. Therefore, the decision of the juvenile court is not against the manifest weight of the evidence, nor is it unsupported by clear and convincing evidence. Father's first, second, third, and fifth assignments of error are overruled.

Reasonable Efforts

{¶ 45} Father also argues that GCCS failed to prove that it had made reasonable attempts to reunify E.V. with her family. The law requires that a public children services agency has the burden of proving that it has made reasonable efforts to reunify a family

before terminating parental rights. *In re C.F.*, 2007-Ohio-1104, ¶ 4. We have defined “reasonable efforts” to mean “a good faith effort which is “an honest, purposeful effort, free of malice and the desire to defraud or to seek an unconscionable advantage.” The issue is not whether [the Agency] could have done more, but whether it did enough to satisfy the “reasonableness” standard under the statute.” *In re N.M.*, 2016-Ohio-318, ¶ 54 (2d Dist.), quoting *In re S.F.*, 2013-Ohio-508, ¶ 21 (2d Dist.), quoting *In re Secrest*, 2002-Ohio-7096, ¶ 13 (2d Dist.).

{¶ 46} By contrast, we have stated that “[r]easonable efforts” does not mean all available efforts. Otherwise, there would always be an argument that one more additional service, no matter how remote, may have made reunification possible.” *Id.* at ¶ 53, quoting *In re K.M.*, 2004-Ohio-4152, ¶ 23 (12th Dist.). *Accord In re C.O.*, 2015-Ohio-4290, ¶ 43 (2d Dist.).

{¶ 47} The juvenile court determined that GCCS did make reasonable efforts. In large part, the juvenile court based its decision on two factors—first, the need to provide E.V. with ongoing and escalated residential treatment programs to address her mental, emotional, and behavioral issues; and second, Father’s lack of success in meeting his case plan objectives.

{¶ 48} Father argues that GCCS failed to adequately communicate with him or refer him to housing, employment, and treatment assistance. But evidence before the juvenile court indicated that when GCCS caseworkers implemented a case plan with Father, he was living in his vehicle. One of the case plan objectives was for Father to meet monthly with the caseworker, yet Father did not or could not comply with this objective because of his lack of housing and transportation. The evidence adduced at the hearing demonstrated that Father’s cellphone would sometimes be off or not working and that the caseworker would

not be able to contact or meet with Father for months at a time. When a caseworker met with Father, bus passes were provided to Father because he said that he had job interviews scheduled. Despite Father's interviews, he remained unemployed between October 2023 and November 2025. Father had at least one job opportunity, but he turned it down and did not gain employment until weeks before the January 2026 hearing.

{¶ 49} In addition to providing Father bus passes, GCCS made referrals for Father to make his scheduled visits with E.V. While E.V. was in a group home in the Dayton area, though, Father did not regularly attend face-to-face visits. Nevertheless, as the juvenile court found, Father regularly had telephone contact, including when E.V. was placed in out-of-town residential treatment facilities. GCCS also requested that Father complete mental health and drug and alcohol assessments and follow up with any recommended treatment. GCCS did not make a referral for Father, but Father attended drug and alcohol in-patient treatment and counseling. He had a positive drug screen in December 2025.

{¶ 50} Father also argues that GCCS should have exhausted all relative and non-relative placement options as part of its reasonable efforts. As discussed above, GCCS contacted all known relatives and determined that none were a placement option for E.V. Father contends that his fiancée's parents were an available option, but GCCS did not learn of them until just before the January 2026 hearing. Father also indicates that maternal grandmother was a placement option for E.V. The evidence before the juvenile court reveals that GCCS made a phone call to maternal grandmother that she failed to return. Given the record before the juvenile court, the court did not err in concluding that GCCS had made reasonable efforts to reunify E.V. with Father. Father's fourth assignment of error is overruled.

III. Conclusion

{¶ 51} Having overruled Father's five assignments of error, the judgment of the juvenile court is affirmed.

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TUCKER, J., and EPLEY, J., concur.