

SUPERIOR COURT OF PENNSYLVANIA

In the Interest of N.L., a Minor

2026 Pa. Super. 72 · No. No. 1631 MDA 2025 · Decided April 10, 2026

SUMMARY

The Pennsylvania Superior Court affirmed an order continuing juvenile court supervision over N.L., a dependent individual, after his twenty-first birthday. The court held that jurisdiction could continue because N.L.’s transition plan was not fully implemented or funded, including the absence of secured Social Security benefits. The court relied on Pennsylvania Rule of Juvenile Court Procedure 1631(e) and Interest of R.P. in concluding that approval of a transition plan requires more than merely developing the plan.

CASE DETAILS

COURT	Superior Court of Pennsylvania
WRITING FOR THE COURT	Judge Dubow; Judge Bowes; Judge Neuman
JURISDICTION	Pennsylvania Superior Court
DECIDED	April 10, 2026
DOCKET	No. 1631 MDA 2025
DISPOSITION	affirmed
PROCEDURAL POSTURE	York County Children and Youth Services Agency, joined by N.L.'s guardian ad litem, appealed from the juvenile court's order denying termination of court supervision after N.L. turned 21 and requiring CYS to fund N.L.'s placement until social security benefits were secured.
STANDARD OF REVIEW	Dependency determinations are reviewed for abuse of discretion; factual findings and credibility determinations supported by the record are accepted, but legal inferences and conclusions are reviewed independently. Questions concerning standing and jurisdiction are reviewed de novo under a plenary scope of review.
PRECEDENTIAL VALUE	published and precedential
PARTIES	York County Children and Youth Services Agency, N.L.'s guardian ad litem v. N.L., a minor

TOPICS

guardianships

guardianship procedure

appellate jurisdiction

mootness

standard of review

PRACTICE AREAS

juvenile dependency

family law

guardianship

QUESTIONS PRESENTED

1. Whether a juvenile court automatically loses jurisdiction over a dependency proceeding when the dependent turns 21.
2. Whether the juvenile court could continue supervision after N.L.'s twenty-first birthday because the transition plan lacked secured income and was not adequately funded.
3. Whether the appeal should be dismissed as moot after the juvenile court later accepted the transition plan and terminated supervision.

HOLDINGS

1. A juvenile court is not automatically and irrevocably stripped of jurisdiction over a dependency proceeding when the dependent turns 21.
2. The juvenile court properly continued jurisdiction because N.L.'s transition plan was not complete or feasible without a secured source of income and funding for the adult placement.
3. The appeal was not dismissed as moot because the jurisdictional issue was capable of repetition and apt to elude appellate review.

KEY QUOTATIONS

“cannot terminate its supervision without approving an appropriate transition plan” (at 5)

“The juvenile court’s approval is meaningless if funding is not in place to support the transition plan.” (at 7)

FACTUAL BACKGROUND

N.L., a non-verbal autistic and intellectually challenged individual, was adjudicated dependent in 2018 and placed in residential treatment. The juvenile court approved a transition plan anticipating adult residential placement at age 21, but the plan encountered difficulties involving paperwork, placement requirements, communication with N.L.'s guardian, and failure to apply for social security benefits. N.L. moved to an adult group home before turning 21, but no benefits had been secured and the facility had received no room-and-board payments. The juvenile court therefore continued supervision and ordered CYS to fund the placement until benefits were activated.

PROCEDURAL HISTORY

N.L. was adjudicated dependent in 2018 and remained under juvenile court supervision while transitioning toward adult residential placement. Shortly before and after N.L.'s twenty-first birthday, the juvenile court declined to terminate supervision because the transition plan lacked secured funding and ordered CYS to pay placement costs pending receipt of social security benefits. CYS appealed, and the Superior Court affirmed. The

record was supplemented to show that the juvenile court later accepted the transition plan and terminated supervision, but the Superior Court retained and decided the appeal under the capable-of-repetition exception to mootness.

DISPOSITION

affirmed

CASES CITED

- In re R.P., 344 A.3d 783, 787, 790-793 (Pa. Super. 2025)
- In re Adoption of A.M.W., 289 A.3d 109, 116 (Pa. Super. 2023)
- In re J.M., 219 A.3d 645, 650 (Pa. Super. 2019)
- In re R.D., 44 A.3d 657, 680 (Pa. Super. 2012)

OPINION

In the Int. of: N.L., a Minor 2026 Pa. Super. 72

DUBOW, J.

J-A07017-26 2026 PA Super 72

IN THE INTEREST OF: N.L., A MINOR : IN THE SUPERIOR COURT OF
: PENNSYLVANIA

APPEAL OF: YORK COUNTY : CHILDREN AND YOUTH SERVICES : AGENCY : : No.
1631 MDA 2025 Appeal from the Order Entered November 7, 2025 In the Court of Common
Pleas of York County Juvenile Division at No(s):

CP-67-DP-0000216-2018

BEFORE: BOWES, J., DUBOW, J., and NEUMAN, J.

OPINION BY DUBOW, J.: FILED: APRIL 10, 2026

Appellant York County Children and Youth Services Agency (“CYS”), joined by N.L.’s guardian ad litem (“GAL”), appeals from the November 7, 2025 order entered in the York County Court of Common Pleas in which the juvenile court denied Appellant’s request to terminate court supervision for N.L. when N.L. became 21 years old and ordered CYS to pay for N.L.’s new placement until N.L.’s legal guardian, Robert Stump, secured social security benefits for N.L.1 CYS argues that the juvenile court did not have jurisdiction to continue N.L.’s dependency following his 21st birthday because CYS had “developed” an appropriate transition plan. The trial court disagreed, finding _____ 1 While an order continuing a child’s goal and placement is not final or appealable, this order is appealable because it concerns the continuation of court supervision of a child adjudicated dependent. after a dependent’s 21st birthday. See Int. of R.P., 344 A.3d 783, 793 (Pa. Super. 2025) (addressing the issue of continuing juvenile court jurisdiction after dependent’s 21st birthday). J-A07017-26 that although CYS had “developed” a transition plan, Mr. Stump had not properly applied for social

security benefits to pay for the plan and thus, N.L. did not have an acceptable transition plan. After careful review, we affirm. The relevant facts and procedural history are as follows. On June 18, 2018, the juvenile court adjudicated N.L. dependent due to concerns about his mother's lack of supervision and inability to manage his special needs.² The court placed N.L. at The Woods, a residential treatment facility focused on lower functioning children and adults with autism. On June 24, 2022, when N.L. was almost 18 years old, the court held a hearing and approved a transition plan for N.L. that contemplated a transition to an adult residential facility when N.L. turned 21. The juvenile court requested that the Orphans' Court appoint a legal guardian for N.L.'s estate due to N.L.'s limited ability to address the paperwork necessary for continued placement and social security benefits. The Orphans' Court appointed Mr. Stump as N.L.'s legal guardian. The juvenile court continued to approve the transition plan at subsequent permanency review hearings, but identified difficulties in the transition, including "complex paperwork and difficulties with waiting lists and requirements for the limited adult residential facilities" as well as "a lack of communication with the guardian appointed by the Orphans' Court." Juvenile Ct. Op., 12/16/25, at 3. _____ 2 N.L. is non-verbal autistic and intellectually challenged. -2- J-A07017-26 On June 23, 2025, during a permanency review hearing, the juvenile court learned that "no one had ever applied for [N.L.'s] social security benefits," "which would be necessary [to] determin[e] funding for implementing the transition plan[.]" Id. The juvenile court referred the case to the Orphans' Court in order to review whether Mr. Stump was meeting the needs of the child. The Orphans' Court found that Mr. Stump was "properly managing [N.L.'s] placement" but acknowledged that N.L. did not have any finances and had not yet obtained social security benefits.³ Orphans' Ct. Order, 8/13/25, at 2. On September 19, 2025, a few months before N.L. turned 21, N.L. transitioned to adult placement at a group home through Community Options. Mr. Stump, however, had not yet obtained social security benefits for N.L., so there were no funds to pay the facility. On November 6, 2025, four days before N.L.'s 21st birthday, the juvenile court held a status review hearing. A Community Options program specialist testified that it had been "challenging getting in regular contact with [] N.L.'s _____ 3 Although Orphans' Court found that Mr. Stump properly managed N.L.'s estate, we question this conclusion in light of the fact that Mr. Stump was generally unresponsive to those assisting N.L. and, more importantly, had not even started the process of applying for social security benefits a few months before N.L. turned 21. Although the Orphans' Court's finding is not before us, we emphasize that if Mr. Stump remains as the guardian of N.L.'s estate, the Orphans' Court has the responsibility to oversee Mr. Stump's stewardship regularly to ensure that he is meeting his obligations and if not, appoint a new guardian for N.L.'s estate. -3- J-A07017-26 legal guardian," that the facility was "still waiting for N.L.'s awards letter to be kicked in with his social security benefit[.]" and that "since N.L.'s moving in in September, [] room and board payment ha[d] not been submitted[.]" N.T. Hr'g, 11/6/25, at 10-11. The court ordered CYS to fund the transition plan because there were no social

security benefits in place. Because of its concern regarding N.L.'s lack of funding for his transition plan, the court, relying on *Interest of R.P.*, 344 A.3d 783, 790 (Pa. Super. 2025), declined to terminate jurisdiction and scheduled an expedited review hearing for February 2026. This timely appeal followed. CYS and the juvenile court complied with Pa.R.A.P. 1925. On appeal, CYS raises the following issue for our review: "The [juvenile] court erred as a matter of law and abused its discretion by extending juvenile court jurisdiction in N.L.'s dependency case after his 21st birthday based on its reliance on [] *Int[erest] of R.P.*" CYS's Br. at 7. "Generally, the standard of review in dependency cases is for an abuse of discretion insofar as the appellate court must accept the [lower] court's findings of fact and credibility determinations if supported by the record, but need not accept the court's inferences or conclusions of law." *Int. of R.P.*, 344 A.3d at 787. To the extent the instant case involves questions pertaining to standing and jurisdiction, our standard of review is *de novo*, and our scope of review is plenary. See *In re Adoption of A.M.W.*, 289 A.3d 109, 116 (Pa. Super. 2023); *Int. of J.M.*, 219 A.3d 645, 650 (Pa. Super. 2019). -4- J-A07017-26 Here, N.L. is now over the age of 21 and no longer falls within the Juvenile Act's technical definition of a "child." See 42 Pa.C.S. § 6302 (indicating that "child" is individual who is under the age of 21 and meets certain criteria). However, this Court recently held that "nothing in Section 6302 suggests that a [juvenile] court in a dependency proceeding is automatically and irrevocably stripped of jurisdiction as soon as the subject individual turns twenty-one years old." *Int. of R.P.*, 344 A.3d at 790. This case implicates Rule 1631(e), which governs the requirements for termination of court supervision for individuals over the age of 18. Pa.R.J.C.P. 1631(e). "In pertinent part, [CYS] must prepare and file a transition plan incorporating the decision-making and input of the subject person." *Int. of R.P.*, 344 A.3d at 791 (citing Pa.R.J.C.P. 1631(e)(2)). The transition plan must include the following: The transition plan must, at a minimum, address and document several vital considerations concerning the dependent's transition into self-sustained life by virtue of the end of the individual's court supervision, including, *inter alia*: (1) specific housing plans following discharge from dependency; (2) a description of any income sources; (3) specific plans for educational and vocational goals; (4) employment goals and status; (5) a description of the individual's continued medical and behavioral health needs; and (6) a description of any other needed support services.

Id. (citing Pa.R.J.C.P. 1631(e)(2)(i)-(v), (viii)). "Thereafter, the court is required to 'review the transition plan' and ensure that [CYS] has satisfied these requirements." *Id.* (citing Pa.R.J.C.P. 1631(e)(3)). In *Interest of R.P.*, we determined that, even if the dependent turns 21, the juvenile court "cannot terminate its supervision without -5- J-A07017-26 approving an appropriate transition plan" and "can only discharge the person from its supervision after all of the above listed requirements have been met." *Id.* (citing Pa.R.J.C.P. 1631(e)(4), (f)) (internal quotation marks omitted); see also *id.* at 793 (court erred in terminating jurisdiction where "the record indicat[ed] that significant questions remained at the time of discharge regarding [the 21-year-old's] future housing, income, education, employment, health needs, and support services"). CYS

argues that Superior Court’s analysis in *Interest of R.P.* does not apply to these facts because the juvenile court in this case finalized N.L.’s transition plan while the juvenile court in *Interest of R.P.* had not “finalized or ratified” R.P.’s transition plan. *CYS’s Br.* at 8. As a result, this Court, in *Interest of R.P.*, remanded the appeal “with instructions that dependency jurisdiction could be terminated once an appropriate transition plan was approved.” *Id.* In contrast, the juvenile court found that the analysis in *Interest of R.P.* applied to this case. *Juvenile Ct. Op.* at 4. The juvenile court emphasized that further court supervision was required to ensure feasible permanent placement for N.L. because “as of June 2025, no one could respond to questions regarding [N.L.]’s social security benefits” and “until such time as [the benefits] begin, [N.L.] does not have a source of income necessary to terminate jurisdiction.” *Id.* at 5, 7. Further, the court explained that: [The transition plan] must have “a description of the child’s sources of income.” [Pa.R.J.C.P. 1631(e)(2)(ii).] Without the source of income being in place, not maybe possibly might be in -6- J-A07017-26 place at some point in the future[, t]he transition plan is not complete. In this specific case, at the time of the last hearing, the representative from the residential placement for the youth raised the following concerns: 1) Behavioral issues related to transitioning to the placement; 2) A monthly payment for room and board for \$712.15 per month[;] . . . and 3) Payment for clothing, laptop needed for communication and other miscellaneous expenses. *Id.* at 7 (emphasis in original). We wholeheartedly agree with the juvenile court’s analysis, commend the juvenile court’s stewardship over this matter, and conclude that it did not abuse its discretion by continuing to assert jurisdiction over N.L. to ensure that N.L.’s transition plan was properly funded. Although *CYS* argues that the juvenile court erred in maintaining jurisdiction because the juvenile court “approved” the transition plan, this argument is disingenuous. The juvenile court’s approval is meaningless if funding is not in place to support the transition plan. The record is clear that at the time of the November hearing, Mr. Stump, who had only started the application process a few months earlier, had not secured social security benefits for N.L. and was unresponsive to calls from his placement.⁴ With the lack of funding and an unresponsive guardian for N.L.’s estate, the juvenile court properly extended its jurisdiction to oversee that N.L.’s transition plan is properly funded. If the juvenile court had not maintained jurisdiction, it is uncertain that Mr. Stump would meet his _____

4 Even *CYS* admits that “[m]inimal efforts were made by [Mr. Stump] to secure any entitlement to social security benefits [] until August 2025 when [Mr. Stump] was brought before the judge of the Orphans’ Court to determine whether or not he was adequately serving N.L.” *CYS’s Br.* at 9, n. 1. -7- J-A07017-26 obligations as the guardian of N.L.’s estate and ensure that N.L.’s transition plan was fully funded.⁵ We, therefore, affirm the court’s November 7, 2025 order. Order affirmed. Judgment Entered. Benjamin D. Kohler, Esq. Prothonotary Date: 04/10/2026

5 We note that on March 18, 2026, the trial court provided a supplemental record indicating that Mr. Stump had filed the necessary paperwork for social security benefits and the social security agency was funding N.L.’s transition costs. On

March 4, 2026, the juvenile court, thus, accepted CYS's transition plan and terminated its supervision of N.L. We, however, will not dismiss this appeal on the grounds of mootness because the jurisdictional issue is "capable of repetition and apt to elude appellate review." In re R.D., 44 A.3d 657, 680 (Pa. Super. 2012). Furthermore, based on our review of the supplemental record, we share the juvenile court's outrage that CYS had not issued any payment to Community Options despite the November 7, 2025, order requiring CYS to fund N.L.'s transition plan until social security benefits were activated. We, however, leave it to the juvenile court to impose any sanctions it deems necessary. -8-