

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)