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Statistically Speaking:
**Youth in Foster Care Articulate What They Need from Legal Counsel;
Will Attorneys Respond?**

Kerease Epps and Allison Green†*

I. INTRODUCTION

High-quality legal representation is in the child welfare spotlight, and for good reason: policymakers are responding to a growing body of research showing that zealous lawyering is an incredibly effective investment to prevent unnecessary foster care entry and expedite positive outcomes. The U.S. Children’s Bureau’s recent expansion of Title IV-E reimbursement to include independent attorney representation for children and parents further encouraged states to examine legal service delivery models and leverage these funds to elevate the quality of representation. While government leaders, non-profit advocates, and academics have all contributed to an evolving definition of high-quality child welfare lawyering,¹ key client perspectives have been absent from much of the conversation.

Responding to this gap in research, a recent set of studies published in the *Children and Youth Services Review* have explored attorney advocacy from the perspectives of youth in foster care, alumni of the system, and dependency attorneys. The results provide important insights and implications for child welfare law improvement and redesign. This article will summarize this multi-part empirical research arc and examine areas of accord and disagreement between key stakeholders. Finally, the article will recommend policy and practice changes based on the research findings and suggest next steps for the legal field.

II. RESEARCH SUMMARY

A. *Perspectives of Youth in Foster Care*

In 2017, researchers from more than five universities across the country embarked on an exploratory study to better understand how youth experiencing foster care assess their legal representation. The researchers surveyed 100 youth with current or prior foster care experience and found that participants “perceived a lack of quality communication and interaction with their legal representatives.” Most participants placed high value on communication from their attorney, regardless of the case outcome.

Qualitative feedback from the youth provided insight into the significance of relationship, communication, and “a supportive exchange” with clients. “Youth clearly

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¹ See, e.g., the Quality Improvement Center on the Representation of Children in the Child Welfare System (QIC) at www.improvechildrep.org, the Family Justice Initiative (FJI) at www.familyjusticeinitiative.org, and the National Association of Counsel for Children (NACC) at www.naccchildlaw.org.

indicate[d] that knowing their lawyers is not enough,” and emphasized that attorneys should intentionally prioritize frequent and quality client engagement, take time to learn and understand the client’s needs, explain the legal framework, and routinely facilitate client participation during court hearings. Overall, “youth who had more contact with their attorneys, either by phone or in person, had better perceptions of their legal representation” and the method of communication (telephone vs. in person), was not statistically significant.

Two authors of the 2017 study conducted further research on this topic through a 2018 group concept mapping study with current foster youth and alumni. The study “was guided by one primary research question: *How do foster youth and alumni conceptualize effective legal representation for young people in foster care?*” Through a facilitated exercise, thirty-one participants “conceptualized effective legal representation via six unique clusters: (1) *Legal Skills*; (2) *Foster Care Knowledge*; (3) *Youth/Attorney Relationship*; (4) *Attitude About Foster Care*; (5) *Contact*; and (6) *Communication*.” Among these, participants rated *Communication*² as the most important and most feasible attribute, followed by *Contact*.³ The high value placed on these two competencies affirmed the initial findings of the 2017 research—communication is key in the eyes of young people involved in dependency matters. A sample of some of the research statements used to define attributes is depicted below.

Table 2
Statement examples by cluster.

Cluster	Statement examples ^a
Legal Skills	36. Effective legal representation is having a lawyer who is competent. 7. Effective legal representation is a lawyer who has a good record of representing youth. 2. Effective legal representation is someone who knows youth rights.
Foster Care Knowledge	41. Effective legal representation is someone who knows that better legal representation can result in fewer placements. 40. Effective legal representation is a lawyer who has been trained to work with foster youth. 46. Effective legal representation is someone who understands foster care systems.
Youth/Attorney Relationship	38. Effective legal representation is having a lawyer who youth can trust. 21. Effective legal representation is a lawyer who believes the youth.
Attitude About Foster Care	17. Effective legal representation is a lawyer who helps youth manage frustrations about court. 6. Effective legal representation is a lawyer who is trying to make things better for youth in foster care. 25. Effective legal representation is an attorney who treats each case as unique, not just like every other one.
Contact	44. Effective legal representation is an attorney who doesn't make youth feel bad for not wanting reunification. 18. Effective legal representation is ensuring that youth receive the name and contact information for their lawyer. 26. Effective legal representation is someone who meets with youth prior to a court hearing. 11. Effective legal representation is having a lawyer assigned in a timely fashion.
Communication	32. Effective legal representation is a lawyer who takes the time to explain things to me. 15. Effective legal representation is having a lawyer who correctly represents the client's concerns and interests. 48. Effective legal representation is a lawyer who listens to youth.

^a The numbers ascribed to each statement are for reference only and are not the result of any statistical computation.

Reprinted from Children and Youth Services Review, Vol. 91, J. Jay Miller, Jacquelynn F. Duron, Jessica Donohue-Dioh, & Jennifer M. Geiger, Conceptualizing effective legal representation for Foster youth: A group concept mapping study, Pages 271-278, Copyright 2018, with permission from Elsevier.

² “Communication” was defined by clustering statements such as “Effective legal representation is a lawyer who takes the time to explain things to me,” “Effective legal representation is having a lawyer who correctly represents the client's concerns and interests,” and “Effective legal representation is a lawyer who listens to youth.”

³ “Contact” was defined by clustering statements such as “Effective legal representation is ensuring that youth receive the name and contact information for their lawyer,” “Effective legal representation is someone who meets with youth prior to a court hearing,” and “Effective legal representation is having a lawyer assigned in a timely fashion.”

Group concept mapping (GCM) is an integrated, mixed-method research approach that utilizes non-metric multidimensional scaling and hierarchical cluster analyses to analyze qualitative data. The study's GCM results are depicted below.

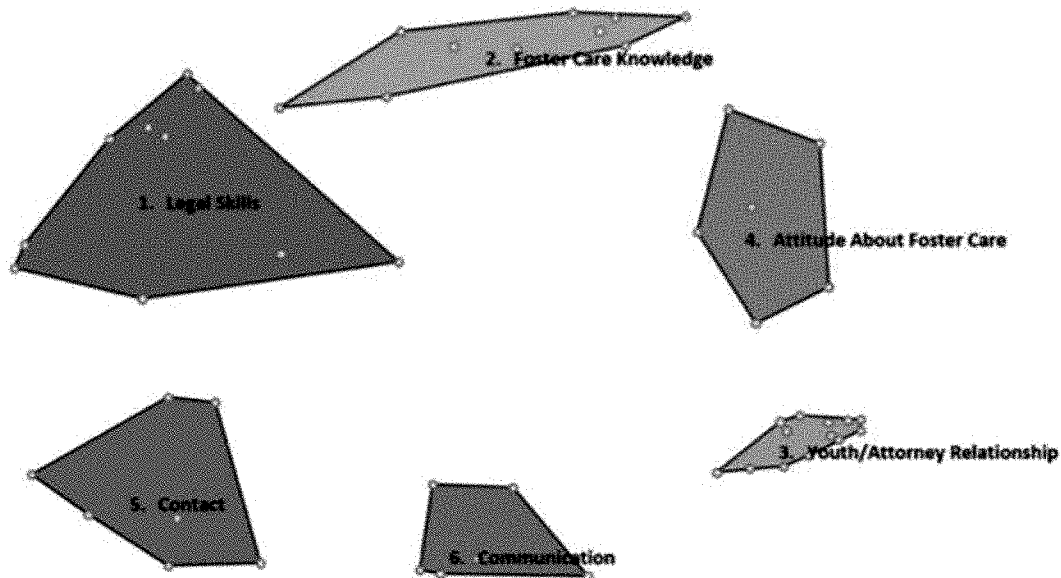


Fig. 2. Point cluster map.

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B. Perspectives of Attorneys

The most recent phase of research, an exploratory study published in March 2020, was borne out of a partnership between the study authors and the National Association of Counsel for Children (NACC).⁴ The study surveyed 934 child welfare attorneys from across the country to assess their perceptions of the quality and efficacy of their own profession. Specifically, the study employed six attributes similar to those originally gleaned during the 2018 concept mapping study to assess practitioner agreement. In sum, the research sought to determine whether attorneys and their child clients agree on the important hallmarks of dependency representation.

The responses yielded several intriguing findings. First, reported work hours correlated with placing increased value on five out of six of the domains. Attorneys who worked more hours on dependency cases were more likely to assess all attributes, except *Communication*, as important. Second, the study found a statistically significant correlation

⁴ Founded in 1977, the NACC is a non-profit membership and advocacy organization dedicated to advancing justice for children and families through high-quality legal representation. For more information, visit: <https://www.naccchildlaw.org>.

between the attorneys' models of representation and their assessment of the attributes. "Those who worked in best interest jurisdictions scored ALL of the domains significantly lower than the other two models (i.e., the state expressed interest model and the hybrid model) except in the area of competence."⁵ Third, finances made a difference. Respondents who agreed with the statement "I cannot make ends meet" scored *Quality*, *Communication*, *Contact*, and *Competence* significantly lower than all other respondents. Finally, longer tenures in the field were negatively associated with quality, contact, relationship, and competence. "These findings indicate that the longer one has been practicing with foster youth, the more negatively they perceive these aspects of legal representation."

Overall, when comparing the attorney and client studies, striking differences emerged. Attorneys perceived *Impact* as the priority attribute of legal representation. However, *Communication* and *Contact*, rated most highly by youth, were ranked third and fourth by attorneys. These results point to a likely disconnect between child welfare attorneys and their client population regarding what high-quality legal representation entails and how it can be improved.

III. POLICY AND PRACTICE RECOMMENDATIONS

These studies present important information for the continued development of child welfare lawyering. The feedback from the child client population sends a central theme, loud and clear: COMMUNICATE. To improve client satisfaction and engage in high-quality child welfare lawyering, attorneys must increase contact and enhance communication with the young people they represent. Child welfare leaders and policymakers can build and support systems that reflect this priority through: (1) rethinking legal education; (2) redesigning attorney training and oversight; and (3) revamping policy.

A. Rethinking Legal Education

Like any legal specialty, education and ongoing training for child welfare attorneys should be responsive to the needs articulated by the client community. The hallmarks of *Contact* and *Communication* underscored in the research create an opportunity to rethink how law school curricula and ongoing attorney CLE meetings might be redesigned to better prepare practitioners to embed these activities in their daily practice.

First, law schools, especially the more than sixty-two schools that house child welfare law clinics, should consider implementing lessons on *Communication* and *Contact* in their related coursework. This might begin in clinical settings and family law classes, but should also extend to legal ethics classes. To graduate from an accredited American law school, students must fulfill at least one ethics requirement. Law schools should use this course as an opportunity not only to expose students to the typical ethical quandaries (e.g., assessing for conflicts of interest and navigating client confidentiality), but also to elevate the role of attorneys as counselors and advisors. While the Model Rules of Professional Responsibility acknowledge that in some instances, "fully informing the

⁵ Although the Attorney Perspectives exploratory study was national in scope, the research regarding youth perspectives was limited to one jurisdiction operating under an attorney guardian *ad litem* model. Therefore, further research is needed to understand whether the model of practice impacts the experience of legal services delivery for represented youth in care.

[child] client . . . may be impracticable,” this is not a blanket proviso; communication, even for clients of diminished capacity, can and should be guided by Rule 1.14. This is especially true in jurisdictions that have already established a minimum age for juvenile prosecution, thereby drawing a bright line as to responsibility, maturity, and capacity to competently engage with counsel.

The 2017 and 2018 studies illuminate how Rule 1.14 can be robustly applied. The research not only elevates *Contact* and *Communication* as key attributes, but also provides further definition for those concepts. According to youth participants in the 2018 concept mapping study, “effective legal representation” includes *Contact* activities such as “ensuring that youth receive the name and contact information for their lawyer,” providing “someone who meets with youth prior to a court hearing,” and “having a lawyer assigned in a timely fashion.” Notably, the latter two of these measures can be effectuated with equal efficiency even for pre-verbal and non-verbal children. These are baseline duties of counsel that might be logically incorporated into and emphasized throughout ethics coursework.

Furthermore, youth participants defined *Communication* as a lawyer “who takes the time to explain things,” “who correctly represents the client’s concerns and interests,” and “who listens to youth.” Although ordinarily a “lawyer is not expected to give advice until asked by the client,” there is no prohibition on doing so, and—perhaps more importantly—the value to the client may lie more in the listening than the advising. For lawyers representing child clients in the dependency system, execution of their duties under Rules 1.4, 1.14, and 2.1 would likely be well-served by an introduction to these concepts during their initial legal ethics education.

B. Redesigning Dependency Attorney Training and Oversight

The 2018 concept mapping study also offers a framework for re-envisioning onboarding, oversight, and evaluation for child welfare practitioners. The youth participants identified six domains that might be used to better design learning to respond to the needs of the client community: *Legal Skills*, *Foster Care Knowledge*, *Attitude About Foster Care*, *Youth/Attorney Relationship*, *Communication*, and *Contact*.

This article is not intended to provide a fulsome picture of the depth, breadth, and variety of onboarding and continual education for dependency attorneys across states and counties nationwide. However, this research arc should prompt child welfare law trainers, as well as law office managers, Court Improvement Program coordinators, and other policymakers to review their current offerings and ask whether they coincide with the skills that youth in foster care and alumni of foster care have articulated are most salient to high-quality legal representation.

1. Trainings

Trainings on the law and related social science—e.g., mental health, trauma, substance use disorder, and more—are common content during state and national level child welfare trainings. The NACC’s own treatise, *Child Welfare Law and Practice*, heavily emphasizes these topics in its nearly 1100 pages. Among these topics, communication training might necessitate deeper emphasis than it typically garners. This might begin with lessons on developmentally-staged interviewing (which is already

integrated in many jurisdictions), but progress to deeper and more novel areas of learning, for example: effectively utilizing through virtual platforms, active and empathetic listening techniques to develop “a supportive exchange,” and ensuring authentic youth participation during court hearings and other case events.

The National Quality Improvement Center on Children's Representation (QIC-ChildRep) study, a six-year federally funded project that concluded in 2016, “provided empirical evidence that specialized child welfare law training and coaching can positively impact attorney behavior and result in more effective representation of children.” This random-assignment experimental design study found that attorneys trained in the QIC Six Core Skills and supported to practice according to the QIC-ChildRep model changed how they represented children, thus resulting in measurable improvement in case outcomes. The model emphasizes the importance of the child's attorney getting to know the client (“enter the child's world”) and the attorney's role in providing legal counsel and advice to the child client. For example, attorneys employing this model in one study site in Georgia, “were more likely to speak, e-mail or text the child client, and meet in person with the child.” Such contact with the child improved the rate of permanency so that children exited from care sooner. The exit to permanency rate was greater for the treatment group—17% faster in Georgia and 16% faster in Washington State. The effect was even greater in the first six months of a case—a 20% faster rate in Georgia and 40% faster rate in Washington State.

From 1995 to 1997, the Centers for Disease Control and Prevention (CDC) and Kaiser Permanente partnered to conduct the Adverse Childhood Experiences (ACEs) study, one of the largest investigations of childhood abuse and neglect. ACEs are potentially traumatic events that occur in childhood (0–17 years) such as experiencing violence, abuse or neglect, and witnessing violence in the home. Also included are aspects of the child's environment that can undermine their sense of safety, stability, and bonding, such as growing up in a household with substance misuse, mental health problems, or instability due to parental separation or incarceration of a parent, sibling, or other household member. Many foster-involved youth have experienced several such instances as well as removal from their homes. As a result, ACEs training should be required for attorneys who represent children. These attorneys are uniquely positioned to employ the strategies identified by the CDC to prevent or mitigate ACEs, including: “connecting youth to caring adults and intervening to lessen immediate and long-term harms.” Established ACEs trainings are designed to equip individuals with the tools to address the needs of children with high ACEs scores. Training in this area will support the call from youth and alumni of foster care to improve the quality of communication, as attorneys will be equipped with the tools to foster relationships in a responsive and understanding manner.

2. Oversight

From this training foundation, children's law office managers, state-level judicial leaders, and policymakers might logically build out methods for attorney supervision, compensation, and evaluation. Managers should pay special attention to building expectations around routine client contact. This may include increasing the frequency of routine communication with child clients; even if there is no formal case update to provide, attorneys should check-in with the clients to solicit information, offer legal advice as needed, and ensure youth are aware that the advocate's attention remains on the case in

between case hearings and milestones. Even if there has been no change to case goals or permanency process, under Rule 1.4(a)(3) of the Model Rules of Professional Conduct, the ethical duty to communicate the *status quo* remains active. Frequent communication between case events will also bolster the attorney's ability to assess and advocate for client well-being measures.

In many jurisdictions, dependency attorneys are only compensated for their in-court time or are paid a flat rate for the case, regardless of its length or complexity. Neither of these financing structures incentivizes out-of-court *Communication* and *Contact*, the very activities youth participants have collectively requested. Legal service delivery systems might begin to address this by ensuring that local standards of practice call for frequent client contact, including between hearings and outside of major case events. From there, financing schemes must be adjusted to compensate attorneys for this time as well. If available funding is a concern, a recent policy change by the U.S. Children's Bureau permitting partial federal reimbursement for children's legal representation provides a pathway to action.⁶

Compensation alone, however, will not ensure that attorneys attend to and prioritize *Communication* and *Contact* in their casework. High-quality legal representation must include attorney oversight and evaluation processes that center this activity in their paradigm. Within law offices, attorney managers should regularly inquire about and assess the lawyer's frequency of client contact and overall responsiveness. Due to the inherent complexities of child welfare cases, practitioners may express reluctance to be measured on the end results of specific cases. Instead of permanency outcomes, measuring the frequency and quality of client contact may be a fair and relevant way to assess work that is within the attorney's locus of control.

Although self-reporting is always valuable, feedback surveys may offer another helpful tool for understanding if the level of current contact meets the client's needs. Survey drafters might even consider the inquiries from the 2017 and 2018 studies as a starting point.⁷ Because surveys evaluating attorney representation are commonly disseminated at the conclusion of the legal matter, high-quality legal service delivery systems must also include a mechanism for clients to elevate concerns or grievances while a case is active.

For solo practitioners whose practice may be evaluated by the judiciary or administrative officers of the courts, attorney-client privilege may create boundaries around assessing frequency and quality of communication. In these cases, proxy measures are still available. For example, the 2017 study found that "[t]he second element of the youth's attorney relationship is a desire to be involved in the court process." Court employees involved in attorney evaluation might use court observations to assess youth engagement:⁸ "Was the child client present?" If not, was an appropriate justification proffered for the youth's absence? If in-person participation was not feasible, did the attorney request accommodations for virtual or telephonic participation? If the client is present for the hearing, do they demonstrate an understanding of the proceeding? Do they share information with the court that indicates advanced preparation? Judicial officers can

⁶ For more information on this change, visit <https://www.naccchildlaw.org/page/TitleIVforLegalRepresentation>.

⁷ See 2017 study, TABLE 3 and 2018 study, TABLE 2.

⁸ Arkansas and Washington already include court observation in their attorney evaluation model.

also assist in these efforts by inquiring about the attorney's most recent visit with the child client.

C. Revamping Policy

Finally, child welfare advocates should consider this research in light of the ongoing call to reauthorize the Child Abuse Prevention and Treatment Act (CAPTA), the only current legislation that provides a federal hook to state accountability around children's legal representation. As currently written, CAPTA requires "that in every case involving a victim of child abuse or neglect which results in a judicial proceeding, a guardian ad litem, who has **received training appropriate to the role**, including training in early childhood, child, and adolescent development, and who may be an attorney or a court appointed special advocate who has received training appropriate to that role (or both), shall be appointed to represent the child." However, the law does not further elucidate what training "appropriate to that role" should include. Although it rightfully emphasizes a need for targeted learning around developmental stages, it does not specify any other key domains arising from the 2018 survey of foster youth and alumni of care, nor does it include any guidelines—even aspirational ones—for the frequency and quality of client contact.

With this research as a foundation, federal policy advocates might consider how CAPTA—overdue for revision at the time of this writing—might be reauthorized with amended language that emphasizes client communication and contact as key components of this role. Just as governors are required to provide assurances that their state system is assigning these advocates, they should also be called upon to assure that all youth in care are assigned a licensed attorney who communicates with them at least monthly.

Likewise, to sufficiently respond to the findings of these studies, policy reform must also address caseloads. If attorneys are to engage in the robust communication and contact for which clients have voiced a need, they must be adequately resourced. The careful data analysis of the QIC-ChildRep project supports the commonsense conclusion that caseload limits what an attorney can do for a child; its findings demonstrated success with an adjusted caseload of sixty cases. Similarly, "[i]n a very detailed systematic study, a Pennsylvania workgroup carefully broke down the tasks and expected time required throughout the life of a case and matched that to attorney hours available in a year." They concluded that caseloads for children's lawyers should be set at sixty-five per full time lawyer. A comprehensive caseload analysis and recommendation is outside the scope of this article and, in fact, may be best generated at the state level, shaped by local practice considerations. However, CAPTA could address this by requiring assignment not only of a licensed, trained attorney, but also one "who has adequate time and resources to provide effective legal representation in the proceeding"; the NACC and other advocates have pushed for such language.

IV. CONCLUSION

Further research is needed to broaden and deepen the understanding of the attorney's role; for example, perspectives of parents' counsel, tribal counsel, and other parties would form an even more comprehensive picture of high-quality child

representation. Additionally, the field is lacking key demographic data about the roles that have been important for social work agencies, education, and other sectors. A nationwide dependency attorney census (or, at minimum, state-level censuses) to capture a current picture of the workforce would provide a baseline for more tailored training, supervision, and policy strategies.

Still, these recent studies provide new and illuminating information that can guide needed changes to the provision of legal services to young people in foster care, and ultimately help attorneys be more responsive to their clients' needs and desires. Removed from their homes and communities and often lacking placement stability and a clear path to permanency, youth in foster care are a vulnerable population. Dependency attorneys are uniquely positioned to act as a vessel for the voices of these youth, which begins with the responsibility to listen. The research has shown that when there is clear and consistent communication between the client and attorney, legal representation can positively impact the overall foster care experience.

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