

Judges' Roles in Promoting Youth-Centered Legal Permanency

ABA Center on Children and the Law

National Council of Juvenile and Family Court Judges

Quick Overview

This judge's action alert:

- ✓ defines youth-centered legal permanency,
- ✓ highlights how legal permanency options for youth are changing to be more youth-centered,
- ✓ explains how judges can support youth-centered legal permanency,
- ✓ highlights brain science research as it relates to permanency for youth, and
- ✓ shares additional resources on youth-centered legal permanency.

“How can we justify making decisions about children that substantially impact their future without hearing from them? ... We owe these young people the chance to weigh in on what should happen to them.”

—Madelin F. Einbinder, Presiding Judge,
Family Division, Ocean Village, NJ¹

A growing movement to study and hear from youth who have experienced the child welfare system is reshaping what legal permanency should look like for adolescents. Youth-led groups and organizations² are ensuring the child welfare system is viewed through the lens of youth who have been there. An undercurrent is a need for youth-centered legal permanency options that integrate youths' individual and collective voices, current knowledge and research, and developmental science as it relates to permanency for youth.

What is youth-centered legal permanency?

Developed with youth's involvement

The importance of engaging youth in their case planning and court hearings to review their permanency plans is essential to give them a sense of agency and a voice in the process. Federal law requires that youth be involved in their case planning and that protections exist for transition-age youth to ensure they are consulted about their transition in an age-appropriate manner.³ State statutes, policies, and court rules and protocols also increasingly require youth participation in their child welfare court hearings.⁴ Many resources have emerged over the last decade that provide guidance on meaningfully engaging youth in court and involving them in placement decisions.⁵ Current practice supports treating youth as experts in their cases and giving them opportunities to express their views and wishes and valuing them as partners in their permanency planning.⁶

Youth who are treated like partners often feel empowered to speak up for themselves. A youth who feels comfortable talking one-on-one with the judge may also feel at ease talking to their teacher, resource caregiver, attorney, social worker, and others who are part of their child welfare journey. For many youth, these individuals become part of their team and set the tone for how they participate by informing them of their rights, encouraging them, and supporting their involvement.⁷

Involves peer mentors/advocates

Peer mentors/advocates are youth who have experienced the child welfare system who help youth currently involved to navigate the system and meet their case plan goals. Involving peer mentors/advocates is a best practice in child welfare to provide system-involved youth with someone who can relate to and empathize with their situations, provide guidance and advocacy, and serve as a mentor.⁸ Peer mentors play a valuable role advising youth about the court process and key decisions, helping them understand the permanency options available to them, and ensuring their concerns and input are considered and addressed in decisions.⁹

The Children’s Law Center in Los Angeles, CA, hires peer advocates through its [Peer Advocate Program](#) to be part of their legal team to mentor youth and help advocate for them in court. In Allegheny County, PA, the [Youth Support Partners](#) program hires young adults who have experienced the child welfare system to educate and empower youth about their role in planning for their futures and help them understand legal mandates, court hearings, and legal documents.

Informed by youth who have experienced the child welfare system

In a 2019 Information Memorandum, the U.S. Children’s Bureau asked child welfare agencies, dependency courts, and court improvement programs to “listen to families and youth served by the child welfare system and integrate their voices into all aspects of child welfare planning and improvement.”¹⁰ It further called on all child welfare professionals, including judges and attorneys, to “strengthen the role of family and youth voice.”¹¹ In 2020, the American Bar Association adopted Policy Resolution 115,¹² which calls for the active participation of children and youth who have experienced child-serving legal systems, including the child welfare system, in reform efforts of those systems.

Listening to families and youth builds trusting relationships, strengthens their capacity to recognize and express their needs, and entrusts them to make decisions about their lives and where they will live. Tapping into the individual and collective experiences of youth and families who have navigated the child welfare system uncovers firsthand insights about areas for reform and possible solutions. As youth voices are elevated in these arenas, they are influencing what permanency looks like for current and future system-involved youth. National and local youth

advocacy programs¹³ and state youth advisory boards¹⁴ can be helpful resources to identify former foster youth who can share insights and recommendations about permanency for youth in the child welfare system in your community.

A core need of all youth in the child welfare system is for positive relationships and connections to caring adults that continue for the long term.

Emphasizes maintaining positive relationships and connections pre and post child welfare system involvement

A core need of all youth in the child welfare system is for positive relationships and connections to caring adults that continue for the long term. Permanency options are shifting to focus on a greater emphasis on kin-based placements and supportive connections with siblings and relatives. Further, there is a growing recognition of the need to support youth to maintain ties to their parents, even if they cannot return home. Explaining to children and youth that parents need help and support is not shaming the parents but supporting them.¹⁵

Establishing supportive relationships with caring adults that continue once the child leaves the child welfare system is also a critical aspect of permanency for many youth. These relationships must not only be viewed as potential placement resources but as ones that can support the youth’s success (e.g., helping the youth mitigate the emotional and physical effects of out-of-home care, encouraging a sense of cultural identity and community, helping the youth prepare for adulthood) and offer support in times of need.¹⁶

Promotes healthy development

Youth are more likely to thrive in placement settings that promote normal, healthy adolescent development. Engaging youth in their case planning and key decisions and hearing their voices supports their brain development and promotes positive youth development.¹⁷ Youth are able to practice critical developmental tasks by envisioning, creating, planning, and leading the steps needed to achieve permanency.¹⁸ When youth are supported and protected in their placements, they experience opportunities for positive growth and maturation, develop a sense of identity and self, form healthy relationships with peers and adults, and have enriching engagements with the world.¹⁹

Helps youth heal and build resilience

In a study²⁰ of transition-age youth in foster care, youth were asked to identify features that would help them manage their transitions. Top features the youth identified related to their physical, emotional, and mental health. Many youth wanted more resources, support, and strategies to address the trauma they experienced and to heal relationships. Placement options that support youth who have experienced trauma help build their resilience through healing relationships and experiences.²¹ Factors that support healing and resilience include: supportive relationships, family relationships, support from at least one caring adult, feeling connected to a positive role model/mentor, peer support, competence, having talents/abilities nurtured and appreciated, self-efficacy, self-esteem, school and community connectedness, and spiritual belief.²² In addition to these factors, empowering youth to take control of and make choices about their healing on their own terms and at their own pace is key.²³

How are legal permanency options changing to support youth-centered legal permanency?

Expanding and strengthening relative and kinship care

Youth generally do best when placed with family members or close family friends, when they cannot return home. The Family First Prevention Services Act of 2018 (FFPSA) emphasizes that children who cannot safely live with their parents should be placed in the most family-like, least-restrictive setting possible to meet their needs.²⁴ The FFPSA prioritizes maintaining the child's connections to relatives and kin as established in the Fostering Connections to Success and Increasing Adoptions Act of 2008. While relative/kin placement has long been prioritized as a placement option for children and youth who cannot reunify with parents, lack of financial support and services through the child welfare system challenged relatives' and kin's efforts to serve in this role.

Recent federal and state reforms, including updating state licensing requirements for relative/kin caregivers and increasing access to state kinship navigator program funds and supports, are strengthening the ability of relatives and kin to serve as permanency resources for youth.²⁵ In Allegheny County, Pennsylvania, for example, kin caregivers are licensed and paid in line with foster caregivers, receive training, and are provided respite care and counseling and emotional support. The investment attracts and retains kin caregivers and benefits children and youth in their care.²⁶

Expanding traditional legal permanency options—**SOUL Family Permanency Option**

The SOUL Family Permanency Option (SOUL Family), currently being piloted in Kansas, is a permanency option developed by youth who have experienced the child welfare system with support from the Annie E. Casey Foundation. SOUL Family establishes a legal connection between a youth and at least one caring adult who provides support during and after

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the youth's transition from the child welfare system. SOUL Family differs from adoption or guardianship by allowing the youth to maintain legal ties with his or her birth parents and siblings while establishing a new legal connection to a caring adult that carries the legal status of a familial relationship and continues throughout the young person's lifetime. SOUL Family offers choices when maintaining connections with a youth's family and community is healthy and desirable for the youth.²⁷

Reforming/ending group institutional placements

Research shows that older youth age 16 and up are more likely than younger children to experience group or congregate care as their first placement in the child welfare system.²⁸ A 2020 study of the experiences of youth placed in institutions concluded that such placements: "failed to meet the mandate of child welfare, were carceral, were punitive, were traumatic and unfit for healthy adolescent development, shielded youth from building relationships, and made youth feel like they didn't have a way out."²⁹ Recent federal law and policy calls for reduced reliance on group care placements by states for children in foster care by narrowing eligibility criteria and limiting states' ability to use federal Title IV-E funds for such placements.³⁰ As states shift away from reliance on group or congregate placements, it is increasingly clear that most youth do better in family-based placements with appropriate supports.³¹

Reducing use of Another Planned Permanent Living Arrangement (APPLA)

APPLA emerged as a permanent placement for older youth for whom reunification, adoption, or

What Adolescent Brain Science Tells Us*

What does the brain have to do with permanency? Because brain development is rapidly changing during adolescence, a youth's environment, relationships, and experiences can profoundly affect the developing brain. A youth's identity, sense of security, view of self and others, and ability to regulate emotions and process thoughts are influenced by brain development. Healthy brain development takes place in the context of positive, nurturing relationships and connections with others.

Key Highlights

- Adolescence is a critical period of brain development, a window of opportunity.
- The adolescent brain is extremely malleable and is heavily influenced by the youth's environment and experiences.
- During adolescence, a youth shifts from relying on the emotional center of the brain to making decisions using the prefrontal cortex.
- Neural integration occurs as different regions of the brain connect and communicate with one another.
- Strong brain connections lead to healthy habits and positive relationships, which promotes optimal brain development. Chronic stress, trauma, experiences of institutional/racial inferiority, and unhealthy habits interfere with healthy brain development

3 R's—Relationships, Rewards, Regulation

Three aspects of the adolescent brain undergo rapid change and should be considered when engaging and empowering youth in court. Consider how youth:

- Regulate emotions and impulses—Take time to prepare youth and give them time to

consult others about decisions to foster positive experiences and avoid becoming emotionally aroused.

- **Develop and maintain healthy, supportive relationships**—Provide a support person or mentor and ensure relationships with you, attorneys, caseworkers, and other court professionals are positive to help them feel supported, not judged.
- **Respond to rewards**—Allow youth to make mistakes without being punished or being treated differently than their non-foster peers.

Permanency Considerations

- Reduce childhood trauma, loss, grief.
- Promote safe environment for healing.
- Avoid/address systemic trauma—separation from family, loss of stability, fears about future.
- Provide nurturing, loving relationships and positive connections.
- Ensure consistent caregiving.
- Engage/empower youth in permanency decisions.

*Source: ABA Center on Children and the Law, Youth Engagement Project. [Adolescent Brain Science Toolkit](#), 2019.

guardianship could not be achieved. It was designed to allow a youth to live independently in a stable, secure living arrangement with connections to significant adults while still under child welfare agency supervision. While this placement option ensures youth have the support of at least one caring adult, it does not provide a legal, permanent relationship for youth. Reducing use of APPLA in favor of permanency options that offer legal permanency, such as the SOUL Family permanency option discussed above, is an improvement.

Reinstating parental rights

Reinstating parental rights can be a viable legal permanency option for youth who have left or aged out of the child welfare system without achieving legal permanence. According to the National Conference of State Legislatures, 22 states permit reinstatement of parental rights through legislation.³² Thirteen of these states allow a petition to be filed requesting reinstatement of parental rights if a child has not achieved a permanent placement in a set time period. The statutes permit courts to consider reinstating parental rights if the parent has made substantial progress toward addressing the conditions that led to termination of

Laws & Policies

Federal laws

- [Family First Prevention Services Act](#)
Prioritizes family-like, least-restrictive placement settings for children, particularly kinship care, and discourages group placements.
- [Preventing Sex Trafficking and Strengthening Families Act of 2014](#)
Requires consulting children aged 14 and older in the development and revision of their child welfare case plans.
- [Fostering Connections to Success and Increasing Adoptions Act of 2008](#)
Prioritizes maintaining a child's connections to relatives and close friends.

National policies

- Children's Bureau. [IM-19-03: Engaging, empowering, and utilizing family and youth voice in all aspects of child welfare to drive case planning and system improvement](#), August 1, 2019.
Emphasizes the role of family and youth voice in a well-functioning child welfare system and encourages child welfare agencies, courts, and court improvement programs to work together to ensure family and youth voice are critical in child welfare program improvement efforts.
- [NCJFCJ Enhanced Resource Guidelines](#)
Requires courts to meaningfully engage youth in court proceedings and stresses the role of the judge in reassuring the child that the process will be fair and the child's voice will be heard.
- [ABA Policy Resolution 115](#)
Encourages judges to engage youth who have experienced the child welfare system in legal system reform, authentically engage youth in their legal proceedings, and remove barriers to youth engagement in court.
- [ABA Policy Resolution 613](#)
Establishes a presumption of child presence in all child dependency proceedings.

parental rights; the parent can provide the child with a safe home; reinstatement is in the child's best interests; and the parent and child agree to reinstatement.³³ Permitting parents whose rights have been terminated to file to re-adopt their children is a suggested alternative if a state's reinstatement statute does not give the parent standing as a party to petition for reinstatement or allow the parent to have legal representation during the reinstatement proceeding.³⁴

Many youth want to maintain relationships with their parents, siblings, and extended families even if they cannot live together.

What is my role as a judge?

✓ Engage and involve youth in permanency planning

Federal law requires courts to meaningfully engage with youth about proposed permanency and transition plans.³⁵ The [NCJFCJ Enhanced Resource Guidelines](#) emphasize ensuring the voices of the people the court serves are heard in the court process. Strategies³⁶ to engage and empower youth include:

- Creating a presumption of presence³⁷ at child welfare court hearings and ensuring youth attend and participate (unless exceptions exist). Consider developing a child-in-court protocol³⁸ policy,³⁹ or court order.⁴⁰ Consider providing an incentive for children's attendance, such as a toy or gift card.⁴¹
- Ensuring the youth receives age-appropriate notice of the hearing.
- Ensuring the youth has been prepared for court, understands the purpose of the hearing, knows who will attend and their roles, and understands his or her rights.
- Welcoming the youth and addressing the youth by name.
- Encouraging the youth to have a peer mentor or advocate who can provide support and advice about permanency planning.
- Building rapport with the youth and asking if the youth has questions throughout the hearing.
- Engaging with the youth about the permanency plan, preferences, status, changes, etc. Always ask what the youth wants to see in a permanent placement. Focus on other issues important to the youth,

including where they are living, school, and with whom they want to be connected.

- Allowing the youth to meet with you in chambers, or privately with their attorney or advocate, to discuss any sensitive issues or questions.
- Providing regular breaks and check-ins with the youth.
- Ensuring the youth understands the court’s decisions, next steps, and can ask any follow-up questions.
- Giving the youth opportunities to share feedback on their experience in the child welfare system and placements, and their experiences in court.
- Maintain contact with the child after the hearing. In Hawaii, family court judges in O’ahu mail handwritten birthday cards to all children in their cases with McDonald’s gift certificates. This extra outreach helps youth feel valued by the judge beyond their court appearance.⁴²

✓ **Prioritize family relationships and connections in all placements for youth**

Many youth want to maintain relationships with their parents, siblings, and extended families even if they cannot live together. Regular family time should be arranged for youth who desire it with their parents and siblings and other important connections. If the youth cannot return home and another permanency plan is pursued, maintaining family relationships should be prioritized when safe and appropriate. Ensuring youth have adult connections who will serve as sources of support during and after child welfare system involvement is also key.

✓ **Prioritize least-restrictive, family-like settings over group/institutional placements for youth**

Unless a youth meets specific criteria for long-term placements in group/institutional placements under the FFPSA, the youth must be placed in the least-restrictive, family like setting.⁴³ Prioritize kin and foster family home settings. Ask youth where they want to live and explore what needs to happen to make that placement a reality. Be mindful of the transition youth who have been in group/institutional care placements for some time may be experiencing as the system shifts from these care settings to more family-like placements. Recognize the impact that all transitions—removal from home, living placement changes—have a traumatic effect and understand that behavior changes are a natural result of those transitions.

Resources

Adolescent brain science

- [The Road to Adulthood: Aligning Child Welfare Practice with Adolescent Brain Development](#)
- [The Promise of Adolescence: Realizing Opportunity for All Youth](#)
- [Promoting Brain Gains for Youth Emerging from Foster Care \(Video\)](#)
- [The Adolescent Brain Toolkit](#)

Federal guidance

- [Family First Prevention Services Act of 2018: A Guide for the Legal Community](#)
- [Implementing the Older Youth Permanency Provisions of the Strengthening Families Act: The Court’s Role](#)

Permanency planning

- [SOUL Family Permanency Option for Older Youth in Foster Care](#)
- [Away From Home: An in-depth report on the experiences and perspectives of young people who have recently lived in institutional placements in foster care](#)
- [New Opportunities for Kinship Families: Action Steps to Implement the Family First Prevention Services Act in Your Community](#)
- [Reducing Congregate Care Placements: Strategies for Judges and Attorneys](#)

Youth engagement/empowerment

- [ABA Youth Engagement Project Resources](#)
- [Strategies for Engaging Youth and Families with Lived Experiences](#)
- [Strategies for Authentic Integration of Family and Youth Voice in Child Welfare](#)

✓ **Involve families in residential group placements for youth**

For youth who qualify for residential group placements, ensure parents and family connections understand the need for the placement and have input and receive updates about the youth’s care and specialized treatment regimens. Maintaining family connections in these placements is just as important as other placements and regular family time should be arranged.

✓ Support youth who transition from foster care

Youth who will age out of the foster care system, or choose to live independently, are entitled to supports to make the transition. Federal law includes protections and supports for these youth, typically starting at age 14, to assist with their successful transitions to adulthood.⁴⁴ Transition supports can include financial, housing, education, employment counseling, independent living skills, and other services and programs aimed at helping youth become independent. Ensure these youth are informed of the benefits and resources that are available to support them. They should be involved in designing their transition plans and have opportunities to give feedback.

Consider holding an event to inform and support these youth. For example, a Hawaii family court holds a biannual event for youth aged 14-18 who are likely to age out of foster care. At this event—“Teen Day”—youth are informed of available resources, watch a mock court hearing, hear a presentation, talk with former foster youth who have aged out, have lunch, and engage with judges.⁴⁵

✓ Engage in permanency planning reforms in your community

Steps to take:

- Include youth who have experienced the child welfare system in discussions with the child welfare community about permanency planning reforms. Determine what youth-centered legal permanency looks like in your child welfare community. What’s missing? What needs to change? Ensure youth are partners in identifying needs, implementing changes, and evaluating the effectiveness or ongoing need for change.
- Support implementation of the FFPSA’s provisions in your community, particularly relating to ensuring family relationships and connections are prioritized in placements for youth, expanding support for relative/kinship placements, and reducing congregate care.
- Ensure youth have input about their permanency plans and decisions are being made with them not for them.
- Explore alternative permanency options for youth like the SOUL Family Permanency Option and reinstatement of parental rights.

Youth-centered legal permanency includes youth in the conversation about permanency from the day they enter the child welfare system. They are not just present in court but meaningfully engaged in permanency planning. As the judge overseeing permanency for youth, supporting a youth-centered framework for achieving legal permanency takes keeping youth in the forefront of decision making. Hear their voices, seek their input, prioritize their relationships and connections, surround them with supportive people and resources, and be open to creative solutions rather than only relying on the typical permanency options and underlying assumptions used in the past.

Endnotes

1. Judge Madelin F. Einbinder. [“CIP Talk: The Judge and Child Partnership: Engaging Youth in Court Hearings,”](#) March 2022.
2. *E.g.*, [Think of Us, Jim Casey Youth Opportunities Initiative](#), Capacity Building Center for States’ [Young Adult Consultant program](#), [California Youth Connection](#), Juvenile Law Center’s [Youth Fostering Change](#), [NACC National Advisory Council for Children’s Legal Representation](#), [FosterClub](#), Selfless Love Foundation’s [One Voice Impact](#).
3. §§471(a)(16), 475(1)(B) and 475(5) of the Social Security Act; See also ABA Center on Children and the Law, Youth Engagement Project. [Federal Laws Supporting Youth in Foster Care Transitioning to Adulthood](#), 2019.
4. *See, e.g.*, ABA Center on Children and the Law, Youth Engagement Project, [Resources](#) (“Youth Engagement in Court”).
5. *Ibid.*; *See also*, National Council of Juvenile and Family Court Judges. [Strategies for Engaging Youth and Families with Lived Experiences](#), 2020.
6. *See, e.g.*, Madelin F. Einbinder’s CIP Talk, [“The Judge and Child Partnership: Engaging Youth in Court Hearings,”](#) which highlights the expectation that youth participate fully in the judge’s decisions relating to permanency; The 2021 revised version of the National Association of Counsel for Children’s [Recommendations for Legal Representation of Children and Youth in Child Abuse and Neglect Proceedings](#) is co-designed by NACC and youth with lived experience and ensures youth voice is woven throughout the practice recommendations.
7. Malufau, Malia E., Youth-In-Court Facilitator, Hawai’i Child Welfare Program, William S. Richardson School of Law, September 8, 2022.
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9. *Ibid.*
10. Children’s Bureau. [IM-19-03: Engaging, empowering, and utilizing family and youth voice in all aspects of child welfare to drive case planning and system improvement](#), August 1, 2019.
11. *Ibid.*

12. American Bar Association. [Policy Resolution 115](#), adopted August 2020.
13. E.g., Juvenile Law Center's [Advocates Transforming Youth Systems, With Lived Experience Foster Care Advocacy Project, Foster Care Alumni of America, National Foster Care Youth & Alumni Policy Council](#).
14. See Child Welfare Information Gateway, [State Youth Advocacy/Advisory Boards & Foster Care Alumni Associations](#).
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16. Think of Us. [AGED OUT: How We're Failing Youth Transitioning Out of Foster Care Insights and Recommendations](#), December 17, 2020, 79; Mandelbaum, Randi. "Re-examining and Re-defining Permanency from a Youth's Perspective." *Capital University Law Review* 43, spring 2015, 259.
17. Youth.gov. [Positive Youth Development](#).
18. Jim Casey Youth Opportunity Initiative. [The Adolescent Brain: New Research and Its Implications for Young People Transitioning from Foster Care](#), 2011; See also ABA Center on Children and the Law. [Adolescent Brain Toolkit](#).
19. National Academies of Sciences, Engineering, and Medicine. [The Promise of Adolescence: Realizing Opportunity for All Youth](#), 2019.
20. Think of Us, *Aged Out*, December, 2020.
21. Conradi, Lisa. "[Supporting the Mental Health of Trauma-Exposed Children in the Child Welfare System](#)." *ABA Child Law Practice*, Jan. 2015.
22. Ibid.
23. Think of Us, *Aged Out*, Dec. 2020, 33.
24. ABA Center on Children and the Law. [The Family First Prevention Services Act of 2018: A Guide for the Legal Community](#), December 2020, 13.
25. Ibid., 13-14.
26. Chiamulera, Claire. "[Reducing Congregate Care Placements: Strategies for Judges and Attorneys](#)," *ABA Child Law Practice Today*, September 5, 2018.
27. Annie E. Casey Foundation. "[SOUL Family Permanency Option for Older Youth in Foster Care](#)," May 2022; The Annie E. Casey Foundation. [SOUL Family: A Proposed Legal Permanency Option for Older Youth in Foster Care](#), 2021.
28. Annie E. Casey Foundation, Center for State Child Welfare Data. [Using Congregate Care: What the Evidence Tells Us](#), September 29, 2021.
29. Think of Us. [Away From Home: Youth Experiences of Institutional Placements in Foster Care](#), July 2021.
30. Family First Prevention Services Act of 2018, Sec. 50741, codified at 42 U.S.C. § 672(k).
31. See, e.g., "[Reducing Congregate Care Placements: Strategies for Judges and Attorneys](#)," for strategies shared by Judge Kim Berkely Clark to dramatically reduce reliance on congregate care in Allegheny County, PA.
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34. Taylor Adams, LaShonda. "Backward Progress Toward Reinstating Parental Rights." *N.Y.U. Review of Law & Social Change* 41, 2017, 507.
35. 42 U.S.C.A. § 675(5).
36. ABA Center on Children and the Law, Juvenile Law Center & Youth Fostering Change. [Strategies to Support Meaningful Youth Engagement in Court](#), undated.
37. At its 2022 Midyear Meeting, the American Bar Association House of Delegates passed [ABA Policy Resolution 613](#) establishing a presumption of child presence in all child dependency proceedings.
38. The Berrien County, Michigan Trial Court, Family Division developed a child-in-court protocol. See Chiamulera, Claire. "[Implementing a Child-in-Court Protocol in Berrien County, Michigan](#)," *ABA Child Law Practice Today*, March 1, 2021.
39. See, e.g., [Engaging Youth in Court: Sample Court Policy](#).
40. See, e.g., [Colorado Youth in Court Order](#).
41. Malia E. Malufau, September 8, 2022.
42. Ibid.
43. ABA Center on Children and the Law, Dec. 2020, 18.
44. ABA Center on Children and the Law. [Quick Reference Guide: Federal Laws Supporting Youth in Foster Care Transitioning to Adulthood](#), 2019.
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Funding for this alert was provided by the U.S. Department of Justice Office of Juvenile Justice and Delinquency Prevention through Award #2018-CT-FX-K001 to the National Council of Juvenile and Family Court Judges. Points of view or opinions expressed are those of the report contributors and do not necessarily represent the official position or policies of the funder or the National Council of Juvenile and Family Court Judges.