

HOW TO USE THIS TOOL

How you can use this tool in trial or appellate advocacy will largely depend on your jurisdiction. For example, you may be able to include the clinical summaries below (or your own synthesis/analysis of them) in your:

- Motion for custody to a kinship resource
- Guardianship petition for a kinship resource, or your client's motion in support of a that person's guardianship petition
- Permanency plan, or opposition to the agency's permanency plan
- Adoption plan or opposition to an adoption plan
- Motion for visits with the kinship resource
- Other motion, petition, memorandum, or
- Appellate brief to educate your appellate court on the importance of kinship placements.

There are other ways, outside of court, you can use this toolkit to affect the outcome of your case or even to effectuate long-term change. For example, you may be able to provide this tool to:

- Your expert
- Your child client's therapist/mental health provider
- Your child client's residential/group home case manager
- A guardian ad litem, CASA, probation officer, or other "neutral" investigator in order to educate (and persuade) them
- The agency social worker or other staff in order to educate (and persuade) them.
- Any workgroup or committee in your jurisdiction, including those that include judicial officers, to further educate them on this issue.

Further, if you have provided this information to your own expert, you may, depending on the jurisdiction, be able to examine the expert on it. If you have provided it to one or more of the other persons listed above, your jurisdiction may permit you to examine or cross-examine them as to whether they read it and whether they pursued (or failed to pursue) a kinship placement.

In any event, regardless of jurisdiction, counsel should be able to *speak* to judges and social workers about the benefits of kinship placement (as set forth in section III, below). Decisions in child welfare cases should be guided by social science research.

Please note that we are including URLs to all cited articles. Some URLs link to complete articles; others link to abstracts, where the complete article can be ordered from the author or from a proprietary database.