

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 joint sibling placement
- Motion for sibling visitation
- Permanency plan, or opposition to the agency's permanency plan
- Adoption plan, or opposition to an adoption plan
- Administrative appeal regarding agency decisions regarding siblings
- Other motion, petition, or memorandum
- Appellate brief to educate your appellate court on the importance of sibling relationships

There are also 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
- Legislators who are considering bills regarding sibling placement or visitation

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 placements where siblings could be together or at least have frequent visits and other forms of contact.

In any event, regardless of jurisdiction, counsel should be able to *speak* to judges and social workers about the benefits of the sibling connection. Decisions in child welfare cases should be guided by social science research.

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