



ASSOCIATION OF
FAMILY AND
CONCILIATION COURTS



eNEWS

President's Message: Testing the Boundaries

His Honour Judge Peter Boshier, Wellington, New Zealand

There were some raised eyebrows following reports that in June this year Judge Lisa Gorcyca of Oakland County (Michigan) sent three siblings, aged 14, 11 and 9, into a juvenile detention centre for refusing to meet their father for lunch.

[Read more](#)

Parenting Coordination and Child Custody Trainings

AFCC, in collaboration with the University of Baltimore School of Law [Sayra and Neil Meyerhoff Center for Families, Children and the Law](#), is pleased to offer two two-day training programs in Baltimore. Debra K. Carter, PhD, will present *Construction of an Effective Parenting Coordination Process: Structure, Tools and Techniques*, November 30-December 1, and Philip M. Stahl, PhD, ABPP, will present *Complex Issues in Family Law and Child Custody*, December 2-3. Each program is eligible for up to 12 hours of continuing education credit. A room block at the [Wyndham Baltimore Mt. Vernon](#), 0.6 miles from the training site, will be held through October 30. A substantial discount is available when you register for both programs. [More information](#), [register now](#)

Final Days to Register for Columbus

Do You Hear What I Hear? Listening to the Voice of the Child November 5-7, 2015, Hyatt Regency Columbus

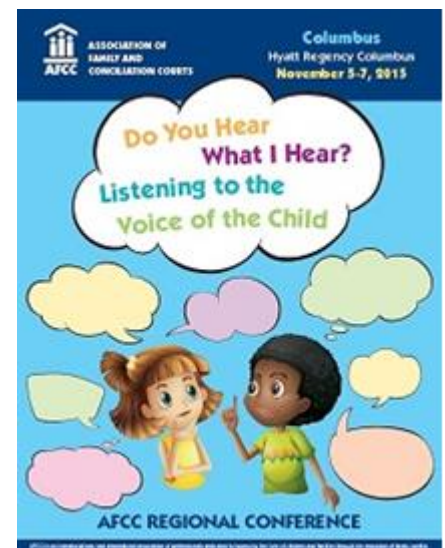
Make check-in even smoother by pre-registering online. If you are already registered, be on the lookout for attendee emails, which contain important information for accessing session handouts before the conference and helpful information about onsite logistics. [Register today](#), [more information](#)

AFCC to Recognize Achievements of Professor Nancy Rogers

AFCC will present a Special Commendation to Professor Nancy Rogers for more than three decades of pioneering work in dispute resolution and she will deliver the conference luncheon address on Friday November 6. Professor Rogers is former Attorney General of Ohio, former Dean of The Ohio State University Moritz College of Law and the current holder of the Michael E. Moritz Chair in Alternative Dispute Resolution at the Moritz College of Law. She has co-authored three law school texts on dispute resolution and a

MONTHLY E-NEWSLETTER
VOL. 10 NO. 10
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Upcoming Conferences



AFCC Regional Conference

*Do You Hear What I Hear?
Listening to the Voice of the Child*
November 5-7, 2015
Hyatt Regency Columbus
Columbus, Ohio
[Program Brochure, Online Registration](#)

AFCC 53rd Annual Conference

*Modern Families:
New Challenges, New Solutions*
June 1-4, 2016
Sheraton Seattle Hotel
Seattle, Washington
[More information](#)

AFCC 12th Symposium on Child Custody Evaluations

November 3-5, 2016
Sheraton Atlanta Hotel
Atlanta, Georgia

mediation treatise, and served as reporter for the Uniform Mediation Act.

Last Call for Exhibits and Advertising

It's not too late to exhibit onsite in Columbus or advertise with a registration packet insert. [Find out more](#)

Point Counterpoint: Play Therapy and Child Custody Evaluation

This point counterpoint examines the role of play therapy in child custody evaluations. Ms. Trubitt is a private practitioner who provides play therapy and family therapy. She is the author of *Play Therapy Goes to Court*. Dr. Martindale is in private practice as a forensic psychological consultant, and was the reporter for the [AFCC Task Force on Model Standards of Practice for Child Custody Evaluation](#).

- [A Call for Humility in a Small World](#)—Anita Trubitt, MSW, LCSW
- [Much is Forgotten in 123 Years](#)—David Martindale, PhD, ABPP
- [A Final Word](#)—Anita Trubitt, MSW, LCSW



Seattle Program Brochure Deadline December 4 Modern Families: New Challenges, New Solutions—June 1-4, 2016

The next AFCC annual conference is still months away, but now is the time to start planning your sponsorship and advertising participation. The deadline for inclusion of print advertising and sponsor listings in the printed version of the conference brochure is December 4. The printed brochure is mailed to over 25,000 interdisciplinary professionals. Early commitment ensures you the best placement—sponsors are listed by level, then commitment date, which is also a consideration for exhibit placement. [Find out more](#)

Free Audio from Martha McCarthy's Keynote on Same-Sex Marriage and Parenting and More from AFCC-AAML

AFCC members can now access free audio recordings of plenary sessions from the recent AFCC-AAML Conference including: *The Defacto Parent in the Modern Family: A Status Report* and *How to*

AFCC Trainings

The graphic features the AFCC logo at the top, which includes a stylized house icon and the text 'AFCC ASSOCIATION OF FAMILY AND CONFLICT RESOLUTION COORDINATORS'. Below the logo, it states 'In collaboration with University of Baltimore School of Law Saym and Neil Meyerhoff Center for Families, Children and the Courts'. Two training titles are listed: 'Construction of an Effective Parenting Coordination Process: Structure, Tools and Techniques' by Debra K. Carter, PhD, dated November 29-December 1, 2015; and 'Complex Issues in Family Law and Child Custody' by Philip M. Stahl, PhD, ABPP, dated December 2-3, 2015. The University of Baltimore Student Center address is provided. At the bottom, a dark blue banner contains the AFCC mission statement: 'AFCC is an interdisciplinary and international association of professionals dedicated to improving the lives of children and families through the resolution of family conflict.'

Construction of an Effective Parenting Coordination Process: Structure, Tools, and Techniques

Debra K. Carter, PhD
November 30–December 1, 2015
University of Baltimore
Baltimore, Maryland
[More information, online registration](#)

Complex Issues in Family Law and Child Custody

Philip M. Stahl, PhD, ABPP
December 2–3, 2015
University of Baltimore
Baltimore, Maryland
[More information, online registration](#)

AFCC Chapter Annual Conferences

Ontario Chapter Annual Conference

October 23, 2015
Toronto Reference Library, Yonge Street
Toronto, Ontario
[More information](#)

Arizona Chapter Annual Conference

January 29–31, 2016
Hilton Sedona Resort
Sedona, Arizona

Try a Case Without Destroying the Family. [Log in](#) to listen or download and save for later. Additional session recordings are available for purchase through [Digital Conference Providers, Inc.](#) A limited number of USB drives containing conference session handouts are available for purchase: \$20 for members, \$40 for non-members, shipping fees apply. Contact the AFCC office at 608-664-3750 or afcc@afccnet.org to order.

Member News

Ken Waldron, Monona, Wisconsin, and Allan R. Koritzinsky have written a new book, [Game Theory and the Transformation of Family Law](#), in which principles derived from game theory—the scientific study of how and why people make decisions—are applied to family law. Game theory lends itself to the practice of family law in the traditional divorce system, one that can lead people to rational but self-defeating and sometimes destructive decision-making.

Merle H. Weiner, Philip H. Knight Professor of Law at the University of Oregon School of Law, has written a new book, [A Parent-Partner Status for American Family Law](#), in which she argues that marriage and other legal structures governing parental relationships are outdated given the demographics of American families. She proposes the creation of a new “parent-partner” legal status that would encourage supportive partnerships and discourage reproduction among uncommitted couples. In the companion book, written for a general audience, [Living Life as Parent-Partners](#), Professor Weiner provides how-tos for parents to live as parent partners.

Staff News

Carly Kreger, our communications coordinator, is leaving AFCC and relocating to Minneapolis, Minnesota. Carly has been with AFCC since 2013. We wish her the best!

Make the Most of Your Membership

How to change your password and update your member profile

This how-to tutorial will show you how to change your password and update your member profile. Members can log in to the Member Center to access the member directory, pay dues, register for conferences and trainings, and access member only resources like the online *Family Court Review* archives. [View the tutorial](#)

Webinars of Interest

Court Research and Domestic Violence Webinars

The Resource Center on Domestic Violence: Child Protection and Custody is offering a free webinar series, *Current Court Research and Its Implications for Domestic Violence Victims. The Self-Represented Litigant Phenomenon: Implications for Justice Seekers and Justice Providers in Domestic Violence Cases*, will be held this Wednesday, October 21, 12:00-1:30pm Eastern. The other webinar

[More information](#)

California Chapter Annual Conference

February 19–21, 2016
InterContinental Mark Hopkins
San Francisco, California
[More information](#)

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Are you a member?
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AFCC offers member benefits that promote excellence in practice.

[View member benefits](#)

Ask the Experts

Is there a topic you would like to see covered by an AFCC Ask the Experts piece?

[Email your suggestion](#)

The opinions expressed in articles published or linked to in the AFCC eNEWS are those of the authors and do not necessarily reflect the positions of the Association of Family and Conciliation Courts.

Readers are welcomed and encouraged to forward this e-newsletter to interested colleagues. [Learn more or subscribe](#)

Editor:

Erin Sommerfeld
editor@afccnet.org



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in the series, *Research Update: Practice and Decision-Making in Custody Cases Involving Domestic Violence*, was recorded and is available for download. [Register or view recorded webinars](#)

SIJS Webinars for State Court Judges

The ABA Working Group on Unaccompanied Minor Immigrants is offering a free, webinar series for state court judges, *The Role of the State Court in the Special Immigrant Juvenile Process*. The first, *Primer on the State Court Judge's Role in Special Immigrant Juvenile Classification*, will be held next Tuesday, October 27, 12:00-1:00pm Eastern. To learn more about Special Immigrant Juvenile Status, see the [May 2015 AFCC eNEWS piece on SIJS and Family Courts](#). [More information](#), [register for the webinars](#)

Family Law in the News

Childhood Stress May Prime Pump for Chronic Disease Later

Allison Aubrey, NPR News

We might not be able to remember every stressful episode of our childhood. But the emotional upheaval we experience as kids—whether it's the loss of a loved one, the chronic stress of economic insecurity, or social interactions that leave us tearful or anxious—may have a lifelong impact on our health. [Read more](#)

Utah Supreme Court Sets High Bar for Grandparent Visitation Orders

Pamela Manson, The Salt Lake Tribune

In 2000, the US Supreme Court ruled a "mere disagreement" over a child's best interests cannot override the presumption in favor of a fit parent's decision regarding grandparent visitation. This week, the Utah Supreme Court ruled that grandparents seeking to override parents must present proof that a visitation order is narrowly tailored to advance a compelling governmental interest—such as protecting children against substantial harm. [Read more](#)



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President's Message: Testing the Boundaries

His Honour Judge Peter Boshier, Wellington, New Zealand

There were some raised eyebrows following reports that in June this year Judge Lisa Gorcyca of Oakland County (Michigan) sent three siblings, aged 14, 11 and 9, into a juvenile detention centre for refusing to meet their father for lunch.

The transcript of the case naturally reveals much more background. But for me, the question arises as to whether it was appropriate to send the children to a juvenile detention centre even if, as appears to be the case, the mother had severely alienated the children from their father. I understand that after a short period in the detention facility, the children were removed by the judge, sent to a summer camp and completed an intensive five-day parental alienation therapy treatment programme.

A very recent report on the case suggests that the custodial situation has changed dramatically. The children are now living with their father, who has applied for a no contact order between the children and the mother, citing the mother's alienating behaviour in support of his application.

On hearing the facts of this case, I was immediately reminded of our discussions at the 2010 AFCC Annual Conference in Denver, the focus of which was alienation and possible means of response. My initial impression was that the judge's actions here were extreme and questionable. Upon reflection, I wonder whether the judge was in fact able to carefully manage a complex situation in a way that ultimately promoted the children's welfare by restoring their father to them. I am interested in the case because I think it raises two significant issues.

First, we must contemplate what steps can legitimately be used when a parent is conscientiously flouting a court order. What are the acceptable limits in the use of coercive power? I ask this question because some court users believe that judicial responses are often too weak.

The second question that arises is what role are the children playing in decision making and how are their voices heard? In alienation cases, determining what the children's views truly are is often easier said than done.

The case illustrates some of the challenges currently being faced in the field of family law and how difficult it is to balance competing factors such as the views of children

on the one hand, and their best interests and welfare on the other. I am encouraged that AFCC has acknowledged that such issues exist and that they can prove controversial. Most importantly, AFCC is promoting the necessary debate and discussion on the correct approach to be taken in such challenging cases.

All of this brings me to the forthcoming regional conference in Columbus, Ohio, between 5-7 November. The theme for this conference is *Do You Hear What I Hear? Listening to the Voice of the Child*. Some of the sessions helpfully focus us on understanding what the issues are in relation to how and when to take children's voices into account and the degree of professional judgment that is required to manage that challenge. For instance, one workshop is entitled "Who is Really Talking to the Judge? Cutting Through the Parent Speak." Another is entitled "Can I Trust the Child's Voice?" And, our plenary session on Friday has as its subject "The Voice of the Child: Who is Hearing What?" An impressive group of presenters will help inform and educate us in the highly important aspect of children's input and how it is to be interpreted in the context of individual cases.

It is often said that only about five percent of family law cases filed actually make it to trial. That sounds about right to me, but what this means is that judges hear the really difficult cases where tough decisions may be required.

AFCC continues to offer a broad range of services to support our members to understand the dynamics and challenges of family law. The necessity and value of this support is clear when we refer to alienation cases, when knowing when and how to look beyond the relevant child's expressed views may be very important.



AFCC Regional Conference

Do You Hear What I Hear? Listening to the Voice of the Child

November 5-7, 2015 | Columbus, Ohio | Hyatt Regency

Exhibit Tables and Advertising Opportunities

About the Association of Family and Conciliation Courts

AFCC is an interdisciplinary and international association of professionals dedicated to improving the lives of children through the resolution of family conflict. Founded in 1963, AFCC is made up of more than 5,000 members from 25 countries. For more than 50 years, AFCC has served as a leader in family court innovation and reform in areas including parenting coordination, mediation, child custody evaluation, family law education and domestic violence.

About the Conference

Join AFCC in the heart of Ohio for an outstanding interdisciplinary program, featuring the latest research, programs, policy and practice. This year's conference program addresses critical issues associated with the voice of the child: how to interview and understand children's responses, taking into account age and language ability; ethical and legal obligations for professionals who interview and represent children; and how to responsibly bring the child's voice into court and dispute resolution processes.

- Approximately 300 attendees, including conference participants, faculty, and AFCC leadership.
- This program is geared toward interdisciplinary professionals working with families experiencing separation, divorce and child custody issues. These professionals include attorneys, mental health professionals, custody evaluators, parenting coordinators, mediators, judges and court services and court connected program staff.
- Food and beverage breaks in the exhibit area.

Hotel and Lodging

The Hyatt Regency Columbus is located in the heart of the city, connected to the Greater Columbus Convention Center and an easy walk to the trendy Arena District, a lively neighborhood with numerous bars, restaurants and shops. Huntington Park, the Ohio State University Campus, State of Ohio Capital Building and the popular Short North Arts and Entertainment District are also close by.

Make your reservation today! The Hyatt Regency is offering a special rate to conference attendees of \$139/night for single or double occupancy. On October 12, 2015, any unreserved rooms in the AFCC block will be released and the special rate will no longer be guaranteed. **Rooms frequently sell out before the room block is released!** Make your reservation online at <https://resweb.passkey.com/go/afcc112015> or call 1-800-233-1234 and mention group code AFCC.

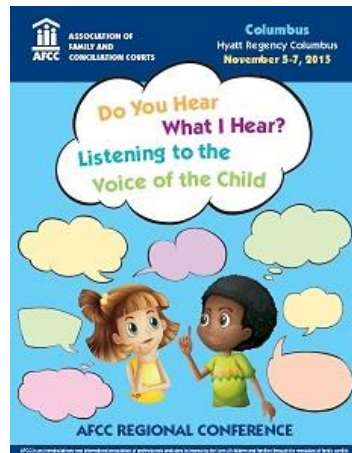
Exhibit Onsite

\$575 AFCC Member/\$725 Non-Member, payment and agreement received by September 1, 2015.

\$625 AFCC Member/\$775 Non-Member, payment and agreement received after September 1, 2015.

Onsite exhibits offer the best opportunity to introduce your products and services to the interdisciplinary community of professionals who attend AFCC conferences. Onsite exhibits include:

- Six foot table and two chairs in the exhibit area
- One conference registration* (sessions, materials, meals and networking functions)
- Recognition and link in the *AFCC eNEWS*, circulation 19,000+
- Listing on attendee USB drive
- Promotion via AFCC social media channels



*Exhibits include registration for one. One additional person may staff the booth or exhibit only, for no additional fee. This person will not receive a name badge, and will not be able to attend sessions or food/beverage functions. If more than one person will attend sessions, an additional conference registration is required.

Exhibit space is sold first-come, first-served. It is to your advantage to sign-up and pay early. The date your payment and agreement are received is one of the factors influencing table placement. Take advantage of the early sign-up discount by submitting your agreement and payment by September 1, 2015. Exhibit table rates increase after September 1, 2015. In order to be listed on attendee materials, your agreement and payment in full must be received by September 28, 2015. All exhibits must be paid for in full prior to attendance.

Exhibit Area

The exhibit area will be located on the second floor foyer in a high traffic area, near the AFCC registration desk and session rooms. Food and beverage breaks will be placed so as to draw attendees through the exhibit area.

Tentative Conference Schedule

[Diagram of hotel meeting space](#)

Wednesday, November 4, 2015

6:00pm-8:00pm Registration

Thursday, November 5, 2015

7:00am-8:00am Exhibit Set Up (Foyer)

8:00am-5:00pm Registration and Exhibit Forum (Foyer)

8:00am-9:00am Coffee and Rolls for Institute Registrants (Foyer)

9:00am-5:00pm Pre-Conference Institutes (Fairfield, Madison, Knox, Marion, Morrow)

10:00am-10:30am Break (Foyer)

12:00pm-1:30pm Lunch (on your own)

3:00pm-3:30pm Break (Foyer)

5:00pm-6:00pm Welcome Reception (Foyer)

Friday, November 6, 2015

7:30am-5:00pm Registration and Exhibit Forum (Foyer)

7:30am-8:30am Coffee and Rolls (Foyer)

8:30am-10:00am Opening Session (Delaware)

10:00am-10:30am Break (Foyer)

10:30am-12:00pm Workshops 1-5 (Fairfield, Madison, Knox, Marion, Morrow)

12:00pm-1:30pm Luncheon (Delaware)

1:30pm-3:00pm Workshops 6-10 (Fairfield, Madison, Knox, Marion, Morrow)

3:00pm-3:30pm Break (Foyer)

3:30pm-5:00pm Workshops 11-15 (Fairfield, Madison, Knox, Marion, Morrow)

Evening Taste of Columbus (off-site)

Saturday, November 7, 2015

7:30am-3:00pm Registration and Exhibit Forum (Foyer)

7:30am-8:30am Coffee and Rolls (Foyer)

8:30am-10:00am Plenary Session (Delaware)

10:00am-10:30am Break (Foyer)

10:30am-12:00pm Workshops 16-20 (Fairfield, Madison, Knox, Marion, Morrow)

12:00pm-1:30pm Lunch (on your own)

1:30pm-3:00pm Workshops 21-24

3:00pm-4:00pm Tear Down

Registration Packet Inserts

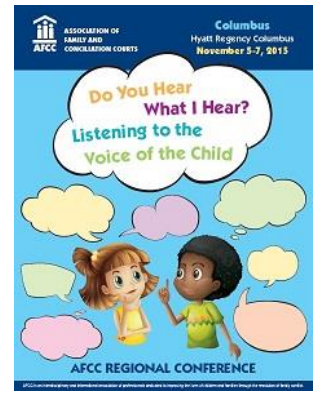
\$100 AFCC Members / \$150 Non-Members

A packet insert is an economical way to share your information with all conference attendees. Your marketing piece is distributed with all conference registration packets (tote bags). This item can be a flyer or something like a pen or a magnet, as long as it is a single item. Items must be shipped in one box and arrive at the hotel on November 2, 2015, for packet assembly. Complete shipping instructions will be provided by AFCC six weeks prior to the conference dates. The deadline to register for a packet insert is October 22, 2015.



ASSOCIATION OF
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AFCC Exhibit Tables and Advertising November 5-7, 2015 | Columbus, Ohio | Hyatt Regency



Please type or print clearly:

Organization Name _____

Onsite Exhibitor Name _____ Email _____

Coordinator (Main Contact) Name _____ Email _____

Phone _____ Address _____

City _____ State/Province _____ Postal Code _____

Include contact information on attendee USB drive? Yes No Yes, with the following changes: public phone, general email and website _____

Please note your selections

AFCC New Member Special

Join AFCC for the first time for **\$150** (\$10 savings) and pay the member rate for your exhibit!

Exhibit AFCC Member, paid before September 1, 2015, **\$575**

Exhibit AFCC Member, paid after September 1, 2015, **\$625**

Exhibit Non-Member, paid before September 1, 2015, **\$725**

Exhibit Non-Member, paid after September 1, 2015, **\$775**

Packet Insert AFCC Member, **\$100**

Packet Insert Non-Member, **\$150**

Total \$ _____

Method of Payment Visa MasterCard AMEX Discover

Payment in full must be received prior to attendance.

Card Number _____ Exp _____ Sec Code _____

Name on Card _____ Authorized Signature _____

Exhibit Cancellation Policy: All requests for refunds must be made in writing. Written notice of cancellation received by fax or postmarked by October 12, 2015, will be issued a full refund minus a \$100 service fee. Written notice received by October 22, 2015, will have the \$100 service fee deducted and the balance issued as a credit for future AFCC conferences, publications, or membership dues. No refunds or credits will be issued for cancellations received after October 22, 2015.

Continued next page, signature needed

Packet Insert Agreement: Instructions for shipping your packet insert will be sent to the coordinator contact via email approximately six weeks prior to the conference. For those registering less than six weeks from the conference dates, instructions will be sent after your payment has been processed. Packet inserts are limited to ONE box shipped to the conference hotel. Materials must be shipped to arrive at the hotel on November 2, 2015. Shipping fees and any fees incurred for packages arriving early, more than one package, or that are incorrectly labeled are the responsibility of the individual, not AFCC. No refunds will be provided for materials that do not arrive in time for packet assembly. Items arriving late will be set out at the take one table. The deadline to register for a packet insert is October 22, 2015. If you wish to have items printed locally and delivered to AFCC at the hotel, arrange for delivery to the AFCC conference area of the hotel on November 2, 2015. Items delivered locally must have the complete address information provided by AFCC clearly listed on the outside of the box.

Exhibit Agreement: Exhibitors assume entire responsibility and agree to protect, defend, indemnify and hold harmless AFCC, the Hyatt Regency, its owners, and each of their respective parent organizations, subsidiaries, affiliates, employees, officers, directors, and agents against all claims, losses or damages to persons or property, governmental charges or fines and attorney's fees arising out of or caused by the sole gross negligence of the hotel and its employees and agents. Exhibitors shall obtain and keep in force during the term of the installation and use of the exhibit premises, policies or comprehensive general liability insurance and contractual liability insurance. Exhibitors acknowledge neither AFCC, nor the hotel, nor its owners maintain insurance covering the exhibitor's property and that it is the sole responsibility of exhibitors to obtain business interruption and property damage insuring any losses by exhibitors.

AFCC will not be liable for the fulfillment of this agreement if exhibit space cannot be provided due to damage to the building or exhibit space by fire, water, smoke, accident, strikes, the authority of law, or any other cause beyond its control. AFCC will, in the event of cancellation due to one of those causes, reimburse exhibitors for the exhibit fees less all legitimate expenses incurred by AFCC in connection with the exhibits. Exhibitors are responsible for any charges incurred for any special services or requirements including, but not limited to, electrical service, power strips and extension cords, audio-visual equipment, internet or telephone lines.

Exhibitors must confine all demonstrations and promotional activities to their exhibit space. No signs or displays may be placed in common or conference areas. Exhibitors are responsible for obtaining any necessary state or local permits, licenses, or certificates. AFCC is not able to accommodate splitting or sharing of exhibit tables or conference registrations. Anyone attending a conference function must be registered for the conference and must wear their name badge at all times. Shipping instructions for exhibit materials will be provided approximately six weeks prior to the conference. All shipping and storage fees are the responsibility of the exhibitor.

A signed exhibit agreement and payment in full must be received before participation can be confirmed or a space is reserved. Specific table assignments will be made at the discretion of AFCC, taking into consideration sponsorship and advertising participation, order in which agreement and payment were received and other necessary conditions.

AFCC reserves the right to determine which exhibitors to accept based upon space limitations, relevance, appropriateness, timeliness, or other similar criteria. All accounts must be paid in full prior to the conference. Participation implies acceptance of the terms listed herein.

I understand that AV costs, such as electrical, internet, and packaging handling, are not included and may require an additional fee paid to the hotel or an AV service provider. Such fees will be at the exhibitor's expense. AFCC is not responsible for any additional costs.

Signature _____ **Date** _____

Please return completed signed form and payment to:
AFCC | 6525 Grand Teton Plaza | Madison, WI 53719 | esommerfeld@afccnet.org | Fax: 608-664-3751

Questions?
Contact AFCC Marketing and Communications Manager, Erin Sommerfeld, 608-663-3750, esommerfeld@afccnet.org.



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eNEWS

A Call for Humility in a Small World

Anita Trubitt, LCSW, MSW, MEd, RPT, Kailua, Hawaii

For more than 25 years, my most important professional affiliations have been with AFCC and APT (Association for Play Therapy). The latter has guided my work as a clinician; the former as a court-appointed custody evaluator, GAL or parenting counselor. When I was asked by a divorce attorney to undertake my first custody evaluation many years ago, the then recently-published *Solomon's Sword* (Schutz, et al, 1989), and still a fine example today, was my first "bible". Shortly after that, I discovered and joined AFCC. I have presented several times at conferences of both organizations. AFCC's journal has been my primary resource in clinical and forensic work, as most of the children I see in therapy live in two homes and have parents who are in litigation over their custody.

As a child and family therapist in private practice for more than 30 years, the observation of children and their parents in the playroom, in spontaneous and structured activity, is an important part of my on-going assessment of the family. Equally important is the obtaining of a detailed family history, learning about parents' expectations and discipline styles, communicating with children's teachers about how they are doing in school, inviting children to draw themselves and then their family, observing the themes and patterns in their spontaneous play with doll house, art materials, and in the sand tray. All of these contribute to my understanding of the child, and guide my on-going treatment as a clinician.

My first court-ordered appointment to conduct a child custody evaluation was in 1987, years before the AFCC published its 2005 *Model Standards of Practice for Child Custody Evaluation*. With no restriction on its inclusion, it seemed a natural evolution to incorporate some play therapy activities into the comprehensive protocol described by Schutz, et al. Their book, in fact, lays out several play tasks for parents and children as part of their evaluation. The field was newer then and we were all looking for relevant and responsible ways of obtaining information about the child that would help us in the daunting task of determining their best interests. I have had collegial exchanges with others at AFCC who have asked how it is possible to evaluate young children without including the observation of their play. Several have shared that they incorporated projective play as part of their assessments. I would venture a guess that this is still true for many clinicians who perform child custody evaluations.

When I wrote my self-published book, *Play Therapy Goes to Court* (2004), AFCC published a brief description in the *AFCC NEWS*. David Martindale, William Austin and Lorraine Martin, leadership of the task force that was then in the process of writing the

AFCC Model Standards, wrote a critical response. At the same time, several other AFCC members who read their critique wrote to me with their questions about how a clinician might incorporate play and projective material in their forensic work, and said there needs to be dialog about this.

While I appreciate and respect AFCC, it should be also understood that the Model Standards, for which Dr. Martindale served as Reporter, have not been adopted by all, including many of the judges in our family court. There are likely many clinicians, some perhaps long-time members of AFCC, who still rely on play therapy modalities to first engage the child in a more natural circumstance, then observe their play behavior, make tentative inferences about it, and note if it is consistent with other pieces of the evaluation. By “play behavior”, I include the observation of projective play activities of the individual child, and structured play activities that include parent and child. What we are looking for in such inclusion is redundancy and consistency in all the data we have gathered in the course of the evaluation.

Here are what other experts have to say about what children’s play can tell us:

Schutz et al, (1989): “The direct observation of interaction between parents and children provides some of the most important data we obtain in our evaluation process. It is also the method that has received the least research attention...The structured observational format consists of five discrete segments, each with its own task: (1) free play, (2) teaching tasks, (3) cooperation task, (4) problem-solving task and (5) clean up.”

Garbarino, (1992, p. 169): “The information children give us through their play and stories has to be interpreted in light of their developmental status, their current life situation, and their history. In other words, children must be viewed within the context of their total life experience. The onus is on the adults to make intelligent and sensitive use of what children tell them through their play and stories. And the adults must depend on their knowledge and skill to use that information wisely.”

Stahl, (1994, p.70): “It is quite rare that a child will simply come into my office and talk about the issues in his life without engaging in an activity at the same time. These activities can be symbolic or non-symbolic, but in each instance they allow the child to feel more comfortable with the evaluation and express himself in some way...I find the use of two dollhouses often stimulates play that is connected with the sharing of two households for the child...These and other play experiences give some clues as to the quality of the relationship between a child and parent...We can ask children to draw a family doing something, which may represent their family experiences. This provides an understanding not only of the child’s place within the family, but also of the way that he perceives the relationship between each of his parents.”

Gitlin-Weiner, Sandgrund, and Schaefer, (2000, pp.8,9): “Despite the difficulties inherent in the use of play assessment techniques, they present much that cannot be acquired from formal testing techniques. Although play assessment can be used by itself, more typically it is used to support, complement, contradict, or elaborate the information obtained through other means and sources. In general, the greater the consistency of information from multiple sources, the greater the confidence in the

conclusions drawn from the data. Multiple sources of information safeguard against over-statements or over-exclusions in deductions drawn from a limited sample of behavior as observed in the laboratory play assessment.”

In his more recent book (Stahl, 2011, p106), he explains that his earlier views on using play therapy techniques have changed, and that while he believes “it is possible to use play as a means of gaining rapport and helping reduce the child’s anxiety, I have come to believe that there is tremendous risk in relying on children’s play as a means of gathering accurate family data.” In his chapter on interviewing children, Stahl raises many important considerations and strategies for gathering information from a school-age child, but these do not sufficiently differentiate between the older and younger child in obtaining relevant material for the evaluation. My position is that it is to this younger age group (3–6 years) that the inclusion of play into the process could provide us with more useful information, but only if it supports other data we have gathered from many other sources.

The research of Marsha Kline Pruett and Kyle Pruett (1999) is of special interest in its use of several play therapy methods with a small sample of children, age six and under. The purpose was to “examine how children’s perspectives are influenced both by the legal process of divorce and by what their parents inform them, purposefully or unintentionally, about the legal and mental health professionals who inhabit their world of divorce.”

Departing from the more widely used methodology of questioning parents about their children’s adjustment to the divorce, these authors were interested in the perceptions of the children themselves, and what might be learned about their capacity to express their perceptions through their play.

In the 1.5 hour home-based interviews, individual children were instructed to draw several pictures, including a picture of a person, of their family and of “divorce.” In addition to the drawings, two different doll houses were supplied, along with furniture, family dolls, pet figures and vehicles. The children were asked to set up the houses in any way they wished, and to use the play materials to act out a day, from waking up to going to bed, when they saw both their mom and dad.

“The majority of play sequences grouped themselves into three themes: (1) back and forth between houses, (2) lawyer play and courtroom drama, and (3) safety and security at home. The lower the conflict and the greater the child’s emotional resources, the less constricted the play themes and narratives; the greater the stress expressed by the child, the less complex and coherent the play” (p. 1546).

The children’s perceptions of lawyers and judges and what they do were also elicited in the interview, along with advice children thought judges should give to their parents, and what judges could do to make things easier for the family. Children’s responses indicated considerable “misinformation about divorce as an event and a process. What they did know was often inappropriate, frightening and confusing.” The authors conclude that “greater awareness is needed of the child’s desire to be heard during the process, to feel safe and less lonely, and to stay in touch with both parents and

extended families. Age-appropriate explanations of psychological and legal aspects of the divorce process are likely to support children's positive adjustment and mental health."

In a follow up article, "Get Over It: Perspectives on Divorce from Young Children," by Ebling, Pruett and Pruett (2009), in which they describe the quantified measures used (p.678) they state as follows: **"Our indirect method for learning about young children's wishes and concerns—identification of play themes—was far more fruitful than direction questioning. The direct questions were likely too complicated, abstract, or fraught for this age group. The high frequency of irrelevant responses we received to direct questions is instructive to our findings: our findings should admonish clinicians, researchers, or evaluators from over-relying on verbal methods in assessing young children. In contrast, children's play was quite revealing."** (my emphasis)

In "A Comprehensive Guide to Child Custody Evaluations, Mental Health and Legal Perspectives, author Joanna Bunker Rohrbaugh (2008) includes "interviewing Techniques and Questions for Ages 3–5: Structured Questions and Play with Follow-up Questions (p.293) which are similar to those suggested by D. Skafte in "Child Custody Evaluations: A Practical Guide (1985). These included play with stuffed animals and two separate houses, calling mom and calling dad on toy phones, changing yourself into an animal of your choice, three stated wishes and the "Island Game" in which a magical elf gives a girl or boy the choice of having one person come to live with them.

My appreciation of AFCC extends far beyond being given this opportunity to address some important differences in what constitutes an acceptable evaluation. The crafting of a set of Model Standards for evaluating the custody of a child, first done in 1994 and again in 2005, has contributed enormously to my understanding of the complex and responsible demands of this work. The commitment to utilizing only evidence that meets the stringent test of reliability and validity is a goal I support, while still seeking a way to include some of the techniques, methods and strategies that do not yet meet that test. This is the primary purpose for this submission, and illustrates the fundamental difference between Dr. Martindale's position and mine. This continues to be a search which I believe other clinicians support, because the currently accepted methodologies do not as yet have all the answers, especially in assessment measure for children under five or six years of age.

I would suggest that the four-level model of clinical inferences proposed by Timothy Tippins and Jeffrey Wittmann in "Empirical and Ethical Problems with Custody Recommendations: A Call for Clinical Humility and Judicial Vigilance" (2005) does provide us with guidelines for a responsible way in which to use our inferences in making recommendations to the court. I offer these examples from my own practice by way of illustrating how I have used them:

LEVEL I—(What the clinician observes)

report examples:

- “The child spontaneously blurted out that she wanted to live with her father because ‘my mother makes me eat all my vegetables and my father lets me eat whatever I want’.”
- “Her younger brother chose two adult family dolls, one male and one female, and used the male to kick the female across the floor.”
- “Father argued with the girl that the house they were building together was too big and when she stopped arguing with him that it wasn’t, she built a separate space for her room outside of the house.”

LEVEL II (What the clinician concludes about the psychology of a parent, child or family)

report examples:

- “Mother may be more concerned about the nutritional needs of this overweight child than father.”
- “Mother reported that father had been physically abusive to her and the child may have witnessed it.”
- “Child building her own room outside of father’s house may be an indication that she is not getting her needs met inside the house.”

LEVEL III (What the psychologist concludes about the implications of Level II conclusions for custody-specific variables)

report example:

- “Mother appears to be more attentive to, and accepting of, the children’s needs than father; there is evidence that he has been attempting to alienate the children from their mother; the parental time share needs to be very specific so that the children’s relationship with mother is not compromised.”

LEVEL IV (The psychologists conclusions about the custody-related “should” in the matter)

report examples:

- “As mother does not have a residence large enough to accommodate the children at this time, it has already been agreed by the parents that they will continue to live primarily with father. Mother shall pick up the children every afternoon after school, assist them with their homework and return them to father’s home by 6 pm. Children should be with her every Saturday from 9 am to 8 pm.”

- “If joint legal custody is awarded, a GAL shall be appointed to assist parents in making decisions about their children when they cannot agree.”
- “The children shall be in therapy until clinically discharged.”

As we continue to work on behalf of the best interests of children, we might well heed these authors’ “call for clinical humility and judicial vigilance” as we continue to humbly acknowledge the limits of our confidence in a field that is terribly complex, and that we hesitate just a little when we find ourselves believing that we have the last word.

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eNEWS

Much is Forgotten in 123 Years

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In 1892, writing on the topic of fingerprint analysis, Sir Francis Galton called attention to the issues that, in today's terminology, are referred to as inter-judge reliability and test/re-test reliability. Galton discussed differences in individual judgments (inter-judge reliability) and consistencies (or lack thereof) in successive analyses of the same fingerprint (test/re-test reliability).

The 123 intervening years have taken their toll on our collective memory, and, in 2015, we find evaluators extolling the virtues of assessment procedures that lack reliability and, as result, also lack validity. Henry Murray is generally viewed as one of the pioneers in the field of projective assessment. When Christiana Morgan and Murray, colleagues at the Harvard Psychological Clinic, wrote the first article about the Thematic Apperception Test (Morgan & Murray, 1935), the title chosen by them was: "A method for investigating fantasies: The Thematic Apperception Test." It is noteworthy that many evaluators who, today, employ the TAT describe the stories told by evaluatees as stories that reflect the evaluatees' *perceptions* of important interpersonal relationships, not as stories that reflect their fantasies. When Murray wrote the *Thematic Apperception Test Manual* (Murray, 1943), he cautioned that "TAT responses reflect the fleeting mood as well as the present life situation of the subject," adding that users "should not expect the repeat reliability of the test to be high..." (p. 18).

Trubitt has asserted that when an evaluator employs the *Family as Animals in the Sand* technique, the "sandtray... becomes a 3-dimensional representation of the child's perception of the family. . ." (Trubitt, 2004, p. 6). The observations offered by Murray regarding stories told in response to TAT cards are applicable to children's play. It cannot be safely assumed that a child's sand-tray play reflects perceptions (as opposed to wishes or fantasies). Neither can it be safely assumed that what a child displays in play on a particular occasion would be displayed on a different occasion, having been transported by a different parent, or having had a particularly good or bad morning at the day care center. Of equal importance is the fact that there are no published data establishing that two or more evaluators observing particular episodes of play generate the same (or reasonably similar) interpretations of the observed play.

Trubitt has also asserted that "[w]here [children] put the family doll that represents themselves tells us where they feel most comfortable or safe" (p. 6). If we presume that "where [children] feel comfortable or safe" is where children wish to be, when children feel

neither comfortable nor safe in their current placement, their doll placement decision would reflect a wished-for placement, not a perception of their current placement.

In the *AFCC eNEWS* article to which I am responding, Trubitt has written: “The commitment to utilizing only evidence that meets the stringent test of reliability and validity is a goal I support, while still seeking a way to include some of the techniques, methods and strategies that do not yet meet that test.” In 2006, Trubitt opined that she had found “a way to include some of the techniques, methods, and strategies” that do not meet “the stringent test of reliability.” She offered the following advice to colleagues: “[C]ontinue to use play therapy methods.... We do not have to mention its use at all in the report to the court” (Trubitt, 2006, p. 5).

Trubitt practices in Hawaii, and Hawaii Rule of Evidence 705 is taken from Federal Rule of Evidence 705, and experts “may in any event be required to disclose the underlying facts or data on cross-examination.” Thus, if Trubitt were to decide not to mention her use of play therapy methods in her report, she would be required to disclose (and defend) those methods on cross-examination. The rights of those who might wish to challenge the manner in which evaluators have developed their opinions are dramatically interfered with when evaluators fail to fully disclose the methods that they employed in formulating their opinions. No constructive purpose would be served if Trubitt’s advice were to be followed, and evaluators employing play therapy methods were to decide not to disclose their use of those methods in their reports. It is likely that such a practice would lead to otherwise avoidable litigation. When evaluators’ reports contain all the information reasonably needed by the litigants, their attorneys, and the court, the probability of pre-trial settlements is likely to be increased.

The wording of Hawaii Rule of Evidence 703 has also been taken from Federal Rule of Evidence 703; however, Hawaii elected to add a sentence that reads: “The court may, however, disallow testimony in the form of an opinion or inference if the underlying facts or data indicate lack of trustworthiness.”

In its decision in *State v. Montalbo*, 828 P.2d 1274 (1992), the Supreme Court of Hawaii offered commentary on the factors to be considered in making decisions regarding the admissibility of proffered evidence. Those factors included whether: “the procedures used are generally accepted as reliable if performed properly [and] the procedures were applied and conducted properly in the present instance” (at 1280, 1281). It is my position that no generally accepted interpretive rules (i.e., procedures) guide interpretive conclusions of the type found in Trubitt’s (2004) text.

Following research conducted on 72 children between the ages of two and four, DeLoache (1995) concluded that young children do not perceive dolls as symbolic representations of themselves. If that is the case, it is even less likely that animals in a sand tray are treated by children as symbolic representations of themselves.

Trubitt asserts that, in her work, she has employed the “guidelines for a responsible way in which to use our inferences in making recommendations to the court” provided by

Tippins and Wittmann (2005). Tippins and Wittmann have perused the examples furnished by Trubitt, and they disagree.

In their abstract, Tippins and Wittmann (2005) state that it is their intention to put forward the argument that where the empirical foundation for evaluator conclusions is tenuous or non-existent, those “opinions should be routinely excluded from the fact-finding process” (p. 193). In personal correspondence, Tippins and Wittmann have stated: “There is more to the Tippins & Wittmann model than simply formatting the report in accordance with the four-level structure posited in our article. The essential feature of our model is its proscription of inferences that cannot be supported by empirical research. Accordingly, if an evaluator wished to state that because the child played in X manner, conclusion Y may be drawn, adherence to our model would require that the evaluator cite research demonstrating that such conclusion can be reliably drawn. Expressing the inference without such empirical support would not adhere to our model.”

In her article, Trubitt includes Stahl’s position statement that “it is possible to use play as a means of gaining rapport and helping reduce the child’s anxiety, [but] . . . there is tremendous risk in relying on children’s play as a means of gathering accurate family data” (Stahl, 2011, p. 106). I conclude by expressing my agreement with Stahl. Play is an indisputably useful communication facilitation mechanism. It is not a reliable data gathering method.

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eNEWS

A Final Word

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Dr. Martindale chides me for suggesting we can omit observations about children's play from our custody evaluation reports. The drawings of self and family, the family as animals in the sand, the setting up of two doll houses, one representing mother's house, the other father's house are but a small piece of a many-faceted evaluation, that includes parent questionnaires and interviews, observations of parent-child interactions in the playroom and in the home visit, collateral contacts with teachers, counselors, pediatricians. While it is surprising how often these play examples are consistent with the other data, it is understood that they never form the sole basis of our recommendations to the court. We collect a mountain of material and we therefore have to be selective about what we include. It is understandable that we would select those examples that best support our own position, as Dr. Martindale has done in his overall assessment of my work. Perhaps this is why he omitted comment on the extensive research of Pruett, Pruett and Ebling and their examples of how very revealing children's play can be.

My primary purpose in submitting this article is to generate discussion, most specifically about what options are available to us as we observe, evaluate and recommend for the best interest of children under the age of five. My thanks to AFCC for this invitation.



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Special Immigrant Juvenile Status and Family Courts

Howard Davidson, Director, American Bar Association's Center on Children and the Law

State courts with jurisdiction over the care and custody of children play a critical role in protecting abused, neglected or abandoned immigrant youth. Special Immigrant Juvenile Status (SIJS) is a form of humanitarian relief that can provide eligible youth protection from deportation and future harm. Involvement of a state court is unique to SIJS among forms of federal immigration relief; youth cannot even file an SIJS petition with federal authorities without first securing a state court order that includes specific findings. Particularly given the recent numbers of unaccompanied youth entering the United States, state courts must be aware of SIJS to protect particularly vulnerable immigrant youth in a timely and effective manner.

At the conclusion of this article is a request for your assistance. Over 68,000 unaccompanied children, largely from Central America, came to the United States in the 12 months ending August 31, 2014. Most were fleeing gangs, domestic violence, drug wars, violence, poverty, and other dangerous conditions. Most of these children and youth have been dispersed throughout the country, placed by the US Department of Health and Human Services, Office of Refugee Resettlement (ORR) with adult "sponsors." Sponsors are often extended family members, and are sometimes protective parents. These youth also may be or have been in federal custody: in ORR youth shelters, group homes, or foster homes. Youth in a variety of these settings could become involved in the family court (custody/guardianship), child welfare (dependency) or delinquency systems.

Some unaccompanied immigrant children and youth qualify for protection from deportation called Special Immigrant Juvenile Status (SIJS). For over 20 years, SIJS has provided eligible abused, neglected, and abandoned undocumented youth with a pathway to lawful permanent residency. SIJS is unique among forms of federal humanitarian relief because state courts play a critical role.

To be eligible for SIJS, a youth must be unmarried, under age 21 at the time he or she files a petition with US Citizen and Immigration Services (USCIS), under "juvenile" court jurisdiction, and in possession of a qualifying court order. The "juvenile" court that issues this order need not be the formal "juvenile court" but rather is broadly defined as a court with jurisdiction under state law to make determinations about the custody or

care of a child. The court may be a juvenile, family, probate, orphans, guardianship, dependency, delinquency, or other court.

State courts were entrusted with this critical role because of the expertise they have in areas concerning the care and custody of children. Although these courts may commonly hear the types of cases through which SIJS predicate findings are sought (custody, guardianship, etc.), some courts may feel uncertain about ruling on an “immigration” case. However, the state court’s role, as created by Congress, is not to issue an immigration determination—whether a youth receives SIJS is determined by federal authorities. The state court is charged only with using state law to evaluate questions of abuse, neglect or abandonment; parental reunification; and best interests of a child.

Qualifying Court Order

The qualifying court order upon which a youth’s eligibility for SIJS is contingent includes written factual findings that:

1. The child is dependent on the court or placed in the custody of a state agency, department, individual, or entity;
2. The child’s reunification with one or both parents is not viable due to abuse, neglect, abandonment or a similar basis under state law; and
3. The child’s best interest would not be served by being returned to the child’s country of origin.

The goal of SIJS—to protect undocumented abused, neglected and abandoned youth—has remained unchanged since Congress created this relief in the Immigration Act of 1990 (P.L. 101-649). But the requirements guiding state court predicate findings have been amended, most recently in the William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008 (P.L.No. 110-457) (TVPRA). Notably, after the TVPRA, the youth does not need to be eligible for long-term foster care to qualify for SIJS. Now, the court considers whether eligible youth may be “dependent on a juvenile court” (although they need not be in the state’s custody) *or* placed by a state court in the custody of an agency or individual. That is, SIJS findings may be part of or based on a case granting custody or guardianship to an individual, a child welfare or delinquency case, an adoption matter, or other proceedings over which the state court has jurisdiction.

Another change brought about by the TVPRA is the court determination that the child’s reunification with one *or* both parents is not viable due to abuse, neglect, abandonment or a similar basis under state law. A youth living safely with one parent, but abused, neglected or abandoned by the other—whether while in the youth’s country of origin or in the US—is eligible for SIJS.¹ This is true even where, under state law alone, a child might not normally be declared dependent because one parent is fit. Similarly, this finding could be made where a child’s non-parent caregiver seeks guardianship of the

¹ See, e.g., *In re Marisol N.H.*, 979 N.Y.S.2d 643 (N.Y. App. Div. 2014).

child, because the non-abusing parent cannot viably care for the child. Termination of the parental rights of the parent with whom reunification is not viable is not required.

Finally, the court must also find that the youth's best interest would not be served by being returned to the youth's country of origin. Like any other best interest determination, this is a fact-specific, individualized assessment of a particular youth's medical and mental health needs, safety risks, educational opportunities, history, family connections, relationships with other supports, and other factors. The judge considering a request for SIJS predicate findings need not be an expert on conditions of the youth's country of origin, but rather be able to make a best interest determination based on the evidence presented.

The best interest determination, as well as the rulings on abuse, neglect or abandonment of the child and viability of reunification with one or both parents, should be included in the written order in a fact-specific and individualized matter, rather than a template restatement of the federal statutory SIJS language.

Evidence

Though courts hearing requests for SIJS predicate findings routinely hear cases involving some form of care and custody of a child, SIJS matters may depart from standard cases in the types of evidence available. Unaccompanied immigrant youth may have experienced traumatic events in their country of origin or on their journey to the US, and have great difficulty testifying about their experiences. Corroborating witnesses are rarely available, as these youth arrived in the US unaccompanied and the relative or sponsor with whom they currently live may not have first-hand knowledge of the abuse, neglect or abandonment the youth suffered. Additionally, depending on where the youth lived, official documentation such as birth certificates may be near impossible to obtain.

State courts hearing SIJS requests weigh the evidence that is presented as best they can. California, for example, has provided guidance specifically on the issue of evidence in SIJS matters (among many others). Recently enacted legislation directs that evidence in support of SIJS predicate findings "may consist of, but is not limited to, a declaration by the child who is the subject of the petition."²

Timing

A youth may file an SIJS petition with USCIS until he or she turns 21. But federal regulations³ require that the juvenile court retain jurisdiction over the case during the pendency of the petition. Where state courts' jurisdiction over youth ends at age 18 (as in many states), a youth seeking SIJS must obtain the predicate findings before he or she turns 18. (USCIS will not deny a pending SIJS application solely because the youth's state court order has expired because of the youth's age.)

² Cal. Sen. Bill 873 (Stats. 2014, ch. 685) (creating Cal. Code of Civ. Proced. sec. §155(b)(1)).

³ 8 C.F.R. § 204.11(c)(5). Federal regulations have not been updated since enactment of TVPRA. Any existing regulations in conflict with federal statute as amended by TVPRA are superseded by the Act.

Conclusion

Despite its availability for maltreated immigrant youth for over two decades, SIJS remains an underutilized form of relief. (Less than one-third of the federally-created cap on SIJS certifications were issued in 2010.) Many youth and caregivers remain unaware of the option. Additionally, only about 32 percent of minors in removal proceedings in immigration court are represented; the rest face experienced government attorneys alone. The recent increase of unaccompanied youth arriving in the US has led to a greater awareness of SIJS, and may lead also to improved legal representation of minors and greater protection for abused, neglected and abandoned youth.

Contact for judges and others who would be interested in working with you on this topic.

The American Bar Association's Working Group on Unaccompanied Minor Immigrants was created to address the immigration crisis affecting unaccompanied minors and the critical need for additional pro bono lawyers to ensure children are provided legal representation in immigration proceedings. The Working Group is developing free webinars for state court judges on SIJS. If you are a judge (or are part of a court) that is interested in advising the Working Group on those trainings, or simply want to learn more about this issue, contact Cristina Ritchie Cooper at cristina.cooper@americanbar.org.

The Working Group can also match volunteer attorneys in your jurisdiction with immigration legal services providers in need of pro bono family law partners; providers are particularly seeking family law partners in Newark, NJ, and Baltimore, MD. Interested attorneys can submit a volunteer form at www.ambar.org/ican. More information can also be found at www.uacresources.org and www.ambar.org/cwimmigration.

Howard Davidson is the Director of the American Bar Association's Center on Children and the Law, leading a large staff in work on child welfare law and policy improvement. Mr. Davidson has been actively involved with the legal aspects of child protection for 40 years and has authored many legal articles and book chapters related to child maltreatment and the law. A Steering Committee Member of the Center on Immigration and Child Welfare, Mr. Davidson is a leader in the field of immigration and child welfare, and writes and presents regularly on the topic. He also has served as chair of the US Advisory Board on Child Abuse and Neglect, is a founding board member of the National Center for Missing and Exploited Children and is also on the governing boards of ECPAT-USA, a national group focused on law and policy reform related to child trafficking and sexual exploitation, and the National Foster Care Coalition.