

Founded in 1977, the **National Association of Counsel for Children (“NACC”)**, is a 501(c)(3) non-profit child advocacy and professional membership association dedicated to advancing the rights, well-being, and opportunities of youth impacted by the child welfare system through access to high-quality legal representation. A multidisciplinary organization, its members primarily include child welfare attorneys and judges, as well as professionals from the fields of medicine, social work, mental health, and education. NACC’s work includes federal and state level policy advocacy, the national Child Welfare Law Specialist attorney certification program, a robust training and technical assistance arm, and an *amicus curiae* program. Through the *amicus curiae* program, NACC has filed numerous briefs promoting the legal interests of children in state and federal appellate courts, as well as the Supreme Court of the United States. More information about NACC can be found at www.naccchildlaw.org.

The Alliance for Children’s Rights (“Alliance”), based in Los Angeles, California, is a non-profit legal services organization dedicated to protecting the rights of impoverished, abused, and neglected children and youth by providing free legal and social services and promoting systemic solutions. For thirty years, the Alliance has provided a continuum of legal services, training, and support for children, youth, young adults, and families involved in the foster care system. The Alliance began as a collaborative effort to provide free legal services to indigent children in Los Angeles County, partnered with the juvenile court to serve youth impacted by the foster care system, and grew to include comprehensive legal advocacy to clear obstacles to adoption from foster care, healthcare, public benefits, education, employment, and guardianship. The Alliance has provided hundreds of trainings to juvenile court judges, attorneys, social workers, probation officers, community-based organizations,

and policymakers on the child welfare system and the rights of children and youth in foster care.

The Barton Child Law and Policy Center (“Barton Center”) is a clinical program of Emory Law School dedicated to promoting and protecting the legal rights and interests of children involved with the juvenile and criminal courts and the child welfare and juvenile justice systems in Georgia. The Center achieves its reform objectives through research-based policy development, legislative advocacy, and holistic legal representation for individual clients. The Barton Center adopts a multidisciplinary approach to achieving justice for youth through which children are viewed in their social and familial contexts and provided with individualized services to protect their legal rights, respond to their human needs, and ameliorate the social conditions that create risk of system involvement.

The Barton Center was founded in March 2000. Its work is directed by Emory Law faculty and performed by law and other graduate students who advocate for children through participation in the Policy and Legislative Advocacy Clinics, the Juvenile Defender Clinic, and the Appeal for Youth Clinic. Under the supervision of experienced faculty members, students represent children in juvenile delinquency, special education, and school discipline cases and seek post-conviction relief for youthful offenders in criminal matters. Students also engage in research, public education, and legislative and policy advocacy on issues impacting vulnerable children. The Barton Center has represented hundreds of youth and trained over 1000 students who now serve in leadership positions in nonprofit organizations, state and local government agencies, and private law firms.

Center for Children & Youth Justice (“CCYJ”) is a 501(c)(3) non-profit organization with a mission to create better lives for generations of children and youth by reforming

the child welfare and youth justice systems. CCYJ works to ensure that such systems are integrated, equitable & unbiased, fueled with innovative ideas, and backed by rules and programs to achieve the best outcomes for children, youth, and young adults.

Children’s Law Center of California (“CLCCAL”) is a non-profit, public interest law firm that represents children under the jurisdiction of juvenile dependency courts in Los Angeles, Placer, and Sacramento Counties. CLCCAL is the largest children’s legal services organization in the nation, representing over 30,000 abused and neglected children. Our attorneys provide an unparalleled level of child advocacy expertise to ensure our clients have an effective voice and can actively participate in all aspects of the legal process, while viewing children within the context of their families, their culture, and their desire to have loving permanent relationships. CLCCAL is also a driving force in local, state, and national policy change in the child welfare system.

Children’s Law Center (“CLC”) is a non-profit organization that fights so every child in the District of Columbia can grow up with a stable family, a quality education, and good health. Since its founding in 1996, CLC has reached more than 44,000 children and families across the District and has changed the future for hundreds of thousands more by advocating for city-wide solutions. As a central part of its work, CLC’s attorneys serve as court-appointed guardians ad litem to hundreds of children in D.C.’s neglect system each year to ensure that its child clients’ legal rights and physical and emotional needs are addressed. CLC also uses its experience and expertise to advocate for changes in the District’s laws, policies, and programs.

Children’s Law Center of Massachusetts, Inc. (“CLCM”), founded in 1977, is a private, non-profit legal advocacy and resource center that provides individual

representation and appellate advocacy for indigent children in child welfare, juvenile justice, immigration, and education matters. CLCM attorneys regularly participate in continuing legal education seminars and have filed amicus curiae briefs in matters that affect children's rights in the past. The CLCM has an interest in ensuring that the rights and interests of children in Massachusetts and throughout the nation are protected. This case presents questions of significance both to the children and to the attorneys who represent them. The amici hope that their views will add to the Court's consideration of the issues raised in this appeal.

The Children's Law Center of Minnesota ("CLC") is a 501(c)(3) organization who promotes the legal rights and well-being of children and youth. CLC's staff and volunteers provide direct legal representation of children and youth, primarily in the child welfare system, and advocates for changes in the systems that affect their lives. CLC carries out its mission in three ways: (1) by providing direct legal representation for children in child protection matters in Minnesota juvenile court; (2) by advocating and participating in state-wide efforts to improve and reform the child protection and juvenile justice systems; and (3) by training volunteer lawyers and other child advocates to represent children. CLC supports Amici's brief correcting fundamental misrepresentations made by Plaintiffs and their amici regarding the Indian Child Welfare Act's (ICWA) protection of the legal rights and best interests of Indian Children.

The Children's Law Section of the State Bar of Michigan is a recognized section of the State Bar of Michigan. The Section has over 400 members who are attorneys and judges practicing in Michigan's child welfare system. Working together, the Section's members make crucial decisions each day that directly and substantially affect the lives of children and families. The Section provides services to its membership in the form of educational seminars, advocating and

commenting on proposed legislation relating to child welfare law topics, and filing amicus curiae briefs in selected child welfare law cases filed in Michigan and Federal Courts.

The Section, because of its active and exclusive involvement in the field of child welfare law, and as part of the State Bar of Michigan, has an interest in the development of sound legal principles in all of these legal areas. The instant case is of particular interest to members of the Children's Law Section because it concerns the Indian Child Welfare Act (ICWA), an essential and important federal law which protects Native American children, families, and culture. Michigan's Indian Family Preservation Act (MIFPA), is directly related to the ICWA, and mirrors the important policy goals and efforts the ICWA was intended to address. The Children's Law Section believes strongly that the ICWA helps to preserve and protect Native American children, families, and culture, and does so legally and constitutionally.

Children's Legal Services of San Diego ("CLSSD") is a non-profit interdisciplinary legal organization that represents abused and neglected children in San Diego County in their dependency proceedings before the juvenile court. CLSSD protects and defends the rights of children and youth in the child welfare system through high-quality and compassionate legal representation. CLSSD works collaboratively with others inside and outside of the San Diego juvenile court system to achieve long term stability either by family reunification or legal permanence.

The Children's Permanency Clinic is housed within St. Louis University School of Law's clinical education program. Recognizing that children thrive in safe and permanent homes, the Children's Permanency Clinic represents children and families in a variety of different legal systems to help reach this goal. Directed by Professor Kathryn P. Banks, J.D., LL.M., the clinic trains students licensed to

practice under Missouri's student practice rule, in best practices for working with marginalized children and families. In addition to legal advocacy, the Children's Permanency Clinic also works on a variety of community education projects.

Children's Rights, Inc. is a national advocacy organization dedicated to improving the lives of children in government systems. Through relentless strategic advocacy and legal action, Children's Rights holds governments accountable for keeping kids safe and healthy. We use civil rights impact litigation, advocacy and policy expertise, and public education to create lasting systemic change. With a more than 20-year record of accomplishment in the area of child welfare reform, the core strength of our national advocacy program has been the grassroots investigation and consequential litigation of reform campaigns designed to address dangerous systemic failings in child welfare systems across the country. Children's Rights has won, and continues to pursue, significant legal victories that drastically improve the wellbeing of system-involved children.

The Colorado Office of the Child's Representative ("OCR") serves to ensure the provision of uniform, high-quality legal representation of children in Colorado. A Guardian ad Litem ("GAL") is appointed for every child named in a dependency and neglect case filed in Colorado, and all GAL services for children in Colorado dependency and neglect proceedings are provided exclusively through the OCR. In Fiscal Year 2019-2020, the OCR oversaw approximately 265 GALs, who represented children in over 13,900 cases.

East Bay Children's Law Offices ("EBCLO"), a 501(c)(3) nonprofit organization founded in 2009, protects and defends the rights of children and youth in the juvenile dependency and probate guardianship systems through

effective, vigorous and compassionate legal advocacy. Employing attorneys and social workers, EBCLO provides holistic and comprehensive advocacy for children's rights both in and out of juvenile court. EBCLO ensures that each child's rights and interests are protected and provides a unique and independent voice for young people in the decision-making that impacts their lives. EBCLO is appointed by the court to represent all children in the Alameda County Juvenile Dependency Court, serving nearly 2,000 children and youth every year. More information about EBCLO can be found at www.ebclo.org.

Juvenile Law Center fights for rights, dignity, equity, and opportunity for youth. Juvenile Law Center works to reduce the harm of the child welfare and justice systems, limit their reach, and ultimately abolish them so all young people can thrive. Founded in 1975, Juvenile Law Center is the first non-profit public interest law firm for children in the country. Juvenile Law Center's legal and policy agenda is informed by—and often conducted in collaboration with—youth, family members, and grassroots partners. Since its founding, Juvenile Law Center has filed influential amicus briefs in state and federal courts across the country to ensure that laws, policies, and practices affecting youth advance racial and economic equity and are consistent with children's unique developmental characteristics and human dignity.

KidsVoice (www.kidsvoice.org) is a non-profit organization founded in 1908 as the Legal Aid Society of Pittsburgh. KidsVoice represents approximately 3,000 children each year in dependency cases, including termination of parental rights proceedings. Our clients include Indian children who benefit from the protections of the Indian Child Welfare Act. KidsVoice provides every child with an advocacy team comprised of an attorney and a social service professional – staff members with expertise in social work, mental health, education, child development, case

management or substance abuse services. KidsVoice is recognized as a national leader in providing children multi-disciplinary services and representation and has worked with the states of Connecticut, Louisiana, Wyoming and Colorado, and in Travis County, Texas (Austin), to develop child advocacy offices using the KidsVoice practices and multi-disciplinary approach to protect child victims of physical abuse, sexual abuse or neglect.

Lawyers For Children (“LFC”) is a not-for-profit legal corporation dedicated to protecting the rights of individual children in foster care in New York City and compelling system-wide child welfare reform. Since 1984, LFC has provided free legal and social work services to children in more than 30,000 court proceedings involving foster care, abuse, neglect, termination of parental rights, adoption, guardianship, custody and visitation. This year, our attorney-social worker teams will represent children and youth in more than 3,000 court cases in New York City Family Courts. In addition, LFC publishes guidebooks and other materials for both children and legal practitioners, conducts professional legal and social work training sessions, and works to reform systems affecting vulnerable children. LFC's experience, expertise and insight as amicus curiae on matters pertaining to court-involved children has been accepted by state and federal courts throughout the country. LFC's insight into the issues in this matter is borne of more than 35 years of experience acting as court-appointed attorneys for children in matters pertaining to their custody.

Legal Aid Center of Southern Nevada Children’s Attorneys Project (“CAP”) was formed in 1999. CAP attorneys provide counsel, advice, and representation to abused and neglected children who have never before had representation. CAP not only represents youth in Clark County’s foster care system, they also advocate for the clients’ special education and behavioral/mental and medical health

needs to ensure the children's rights are enforced. In 2019 CAP received the Outstanding Children's Law Office award from the National Association of Counsel for Children.

The Legal Aid Society of Palm Beach County is home to the Juvenile Advocacy Project and the Foster Children's Project and represents over 1,000 children every year. Most of those children are involved in the child welfare system in Florida. The Society's representation of children has always focused on achieving permanency and stability for each child served. However, this work has taught us that each child's situation is unique and each child needs to be treated as the individual they are. The Society believe this includes Native American children, who deserve to be treated and respected as members of the Tribe they belong to. ICWA protects Native American children from having this important part of whom they are ignored. The Legal Aid Society of Palm Beach believes ICWA should remain intact as it serves the interests of Native American children by respecting who they are when they enter the child welfare system.

Legal Counsel for Youth and Children ("LCYC") is a nonprofit legal aid organization that protects the interests and safety of children and youth in Washington State by advancing their legal rights. LCYC provides holistic, child-centered legal advocacy to children in child welfare cases in King County, Washington.

The Massachusetts Committee for Public Counsel Services ("CPCS") oversees the provision of legal representation to indigent persons in proceedings where there is a right to counsel. CPCS's Children and Family Law Division oversees the provision of counsel to children and indigent parents in cases where children may be removed from their homes, including cases in which the Department of Children and Families intervenes in family life. CPCS protects the fundamental rights of parents and children to remain

together whenever possible and be reunited quickly when children are removed from their homes.

The Minnesota Guardian ad Litem (“GAL”) Program is a state-wide, independent board-governed program within Minnesota’s state court system representing the best interests of children in juvenile and family court proceedings specifically including child welfare, custody, and adoption proceedings. Understanding and respecting the critical importance of the Indian Child Welfare Act in protecting and promoting the best interests of American Indian children who are members of, or eligible for membership in, federally recognized tribal nations, and acknowledging the significant disparities and disproportionalities American Indian children and their families continue to experience in these proceedings, the Minnesota GAL Program and its ICWA Division are committed to advocating for the best interests of American Indian children by persistently applying ICWA and MIFPA (Minnesota’s codification and strengthened version of ICWA) to preserve American Indian families and culture.

The National Center for Youth Law (“NCYL”) is a private, non-profit law firm that uses the law to help children achieve their potential by transforming the public agencies that serve them. For over 50 years, NCYL has worked to protect the rights of children and ensure that they have the resources, support, and opportunities they need to become self-sufficient adults. NCYL provides representation to youth in cases that have broad impact and has represented many youth in litigation in the areas of child welfare, education, immigration, juvenile justice, and other systems, including Indian children.

The Office of the Law Guardian located within the New Jersey Office of the Public Defender (“OLG”) represents all children and young adults in child protection and welfare litigation brought by the state child welfare agency in New Jersey. OLG attorneys regularly represent children in

cases that involve application of the Indian Child Welfare Act (ICWA).

Pegasus is a non-profit law firm, located in New Mexico, providing civil legal services to children from one day old to 25 years old. One of the services we provide is to be a Guardian ad Litem and Youth Attorney in child welfare cases. Two years ago an ICWA court was formed in Bernalillo County, New Mexico, and Pegasus was invited to be the children's attorney in these cases. We are also part of the implementation team for the Kevin S. class action lawsuit on behalf of all children in foster care in New Mexico. One of the sections focuses on improving the implementation of ICWA for all Native American children in foster care.

The Pima County Office of Children's Counsel ("OCC") provides legal representation to children in dependency cases, including guardianship and termination of parental rights proceedings. Arizona law provides legal counsel for every child in dependency proceedings. OCC attorneys, along with a staff of social workers, have been providing a multi-disciplinary approach to legal representation for children since 2010. For the last two years, OCC has also been a part of the ICWA Court formed in Pima County to ensure adherence to ICWA requirements and improve case processing, hearings, and outcomes, while protecting the best interests of Indian children.

Public Counsel has worked with communities and clients for over fifty years to create a more just society through legal services, advocacy, and civil rights litigation. Public Counsel is committed to removing legal barriers for children, youth, families and communities of color most impacted by racism and economic injustice. In our work with children and families, we see how the long reach of the child welfare system separates children, both formally and informally, from their

families, communities, and culture—creating trauma that reverberates through generations.

Rocky Mountain Children’s Law Center (“RMCLC”) advocates for children and youth, drives systemic reform, and boldly challenges the status quo so that every young person who has experienced trauma or instability has the opportunity to thrive. For over four decades, RMCLC has served as a leader in child advocacy in Colorado.

Southeast Louisiana Legal Services (“SLLS”) is the free civil legal services provider available for half the low-income families in the Louisiana, including New Orleans and Baton Rouge. Among many other types of cases, SLLS provides representation to the children who are affected by child welfare proceedings, including involuntary removals and parental terminations in 15 of the state’s 64 parishes. Removal of children from their parents without adequate outreach to families and others who could maintain the children's former relationships and culture has been a recurring problem for our child clients. ICWA imposes an important pause in the process to prevent these failures, for those it protects.

The Virginia Poverty Law Center (“VPLC”) is a 501(c)(3) non-profit organization committed to breaking down systemic barriers that keep low-income Virginians in the cycle of poverty through advocacy, education, and litigation. Since 1978, we’ve advocated for legislation that benefits low-income Virginians and provided training to legal aid organizations throughout the Commonwealth in the following areas: housing, consumer rights, domestic and sexual violence, elder rights, family and child welfare, health insurance, and public benefits. We provide training to local legal aid program staff, private attorneys, and low-income clients relating to the civil legal rights of low-income Virginians.

VPLC's Center for Family Advocacy works to improve life for low-income families by, among other things, advocating for laws and policies that counteract the impacts of unjust and inequitable laws and policies. This includes addressing domestic violence and harmful child welfare practices that traumatize children, families, and communities by removing children from their families, communities and culture, and damaging family integrity.

Virginia has seven federally recognized tribes and four additional state-recognized tribes. We are in support of the protections the Indian Child Welfare Act (ICWA) provides to Virginia's Native American children, families, and culture.

The Youth Law Center ("YLC") is a national organization, founded in 1978, that advocates to transform the foster care and juvenile justice systems so that children and youth can thrive. Through legal, legislative, and policy advocacy, YLC works to advance the rights of young people who come into contact with the juvenile justice and child welfare systems and to strengthen the supports available to them so they can transition successfully to adulthood and thrive. YLC's priorities include supporting young people's connection to culture and community and their ability to remain at home with family with appropriate supports whenever possible, following evidence-based best practices such as those codified in federal law and ICWA.