# **Kinship Policy Improvements Toward Child Welfare System Transformation**



FAMILY TIES: ANALYSIS FROM A STATE-BY-STATE SURVEY OF KINSHIP CARE POLICIES

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#### **ABOUT THE ANNIE E. CASEY FOUNDATION**

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In 2022, the Annie E. Casey Foundation partnered with Child Trends to field a survey to better understand what state kinship care policies are in place and where gaps exist.¹ The survey, an update and expansion of a 2007 Casey-Child Trends study, reflects new federal opportunities and research on the field's understanding of kinship care and examines the implementation of federal policies. Although survey findings show expanded policies to keep children connected to kin, similar inequities in the availability of resources persisted in 2022. There is a need for child welfare agencies to expand their collection and use of data, as well as genuinely partner with kinship caregivers, in system transformation efforts.

In recent years, child welfare agencies have increasingly looked first toward kin when courts have deemed removal necessary. This growing reliance on relatives and close family friends reflects an evolving understanding of the importance of kin in child welfare systems. Kin provide stability for children and youth in the custody of the child welfare system and connection to extended family and community. Kin offer a unique perspective. They often have a deep understanding of a family's challenges and needs, enabling them to help agencies build a pathway to success for children and parents during times of stress or when there is a safety risk to the child.

Because of the growing understanding of the vital role extended family can play in child welfare system improvement, the child welfare field realizes how crucial it is to bring kin to the table early and involve them in decisions about what the family needs to stay together. If removal is deemed necessary, extended family are already engaged and can provide permanency through guardianship and adoption and increase the support children and youth need when temporarily separated from their parents.

The 2022 survey on state kinship care policies reveals areas of progress in engaging and supporting kinship caregivers alongside persistent gaps that hinder equitable resources for families. The results make it clear that policymakers must create and implement policies to provide kin with adequate support and empower them as key resources in strengthening and stabilizing families.

The survey provides the foundation for a fivepart series of policy briefs released by the Casey Foundation throughout 2024. The series explores:

- policies that reduce barriers to foster home licensure for kin;
- policies that affect unlicensed kin who are caring for children in the custody of the child welfare agency;
- policies that govern kinship diversion and provide support for children and caregivers in diversion arrangements; and
- policies that encourage agencies to engage and partner with kinship caregivers, children and parents through mechanisms like family team meetings and kinship navigation services.

#### Family Ties: Analysis From a State-By-State Survey of Kinship Care Policies

In 2022, the Annie E. Casey Foundation asked Child Trends to field a written survey of child welfare agency administrators to understand policies that guide the states' work with the relatives and close family friends of children who come to the attention of the child welfare system. This kinship policy survey invited administrators to define "policies" broadly to include statutes, agency regulations and other written policy guidance related to kinship care. Agencies in the 50 states, the District of Columbia and Puerto Rico received the 2022 survey. Forty-six completed it.<sup>2</sup> The 2022 survey updates and expands on the findings of a similarly comprehensive survey conducted in 2007.<sup>3</sup>

To read overall findings from the survey and other briefs in the series, please visit www.aecf.org.

In this concluding brief, the Foundation examines areas of progress across these topics since the 2007. This brief discusses gaps that persist in kinship care policy and how policymakers are using data and the perspectives of kinship care families to make decisions.

#### A SHIFTING POLICY LANDSCAPE

Decades of federal policy, with robust implementation by states, have helped shape opportunities for for promoting and supporting kinship care. The Fostering Connections to Success and Increasing Adoptions Act of 2008 (Fostering Connections) played a critical role in connecting with and supporting kin for placement and permanency options.4 It required states to identify and notify relatives when children enter foster care, allowed states to use federal Title IV-E funds for guardianship assistance programs, authorized a competitive grant program for a limited number of states to create kinship navigator programs and gave states the option to waive nonsafety licensing requirements to help more kinship caregivers become licensed foster parents.5 Additional federal policies passed after 2008 have provided funding for kinship navigator programs and family-finding services.6

Kin are important resources for both preventing removals into foster care and for supporting the safe reunification of children and youth with their parents. Recent policies are creating mechanisms for acknowledging and supporting those roles.

For example, the federal Family First Prevention Services Act of 2018 opened the door to Title IV-E funding to provide evidence-based kinship navigator programs and prevention services to parents, kin caregivers and children to prevent entry into foster care.7 Additionally, a 2024 federal rule allows jurisdictions to use Title IV-E funds to provide legal services, including to kinship caregivers, to prevent a child's entry into foster care or support reunification.8 Beyond implementing federal options and requirements, state child welfare systems promote placement and permanency with kin by communications changes on the importance of kin, training caseworkers to work with kin, creating kinspecific resources and leveraging state dollars to fill gaps in federal funding.9

#### **AREAS OF PROGRESS**

Kinship care policies have changed dramatically since 2007.

Both administrative and state policy data reflect the increasing reliance on and need to support kinship caregivers that has occurred over time. When the 2007 survey was released, the researchers reflected on that period of change:

"Before the 1980s, child welfare agencies rarely placed children in state custody with kinship caregivers. As the use of kinship foster care grew rapidly in the 1980s and 1990s, states generally applied the policies and regulations designed for non-kin foster parents to kinship foster parents.

However, during the past decade, states have increasingly sought to develop strategies and tools to make better use of these placements." 10

Enthusiasm for developing policies that promote and support kinship care has accelerated since 2007, fueled in part by new federal funding and requirements. As mentioned, the 2022 survey shows robust implementation of Fostering Connections — with most states (37) allowing the waiver of certain licensing standards for kin, 12 states requiring relatives be notified more quickly than the federal requirement of 30 days after the removal of a child<sup>11</sup> and most states requiring family team meetings at some point in a case.<sup>12</sup>

With these and other policy shifts, there has been an expected increase in placements with kinship caregivers. Between 2007 and 2021, placements with kin for children birth through age 17 increased by 10%. By 2021, federal data showed that 50% or more of children in foster care in Arizona, Hawaii and West Virginia were in kinship placements, and with most states having between a quarter and half of children in foster care placed with kin.<sup>13</sup>

Achieving permanency through subsidized guardianship is another area of rapid growth. Although most states did have an option for children to achieve permanency through legal guardianship in 2007, only a third of those states provided ongoing financial assistance.<sup>14</sup> Fueled by the option of federal funding through Fostering Connections, there are now 42 states, the District of Columbia, Puerto Rico, the U.S. Virgin Islands and 11 tribes with approved plans to provide guardianship assistance subsidies through Title IV-E.15 From 2007 to 2021, the number of children and youth exiting foster care to guardianship increased 38%.16 In addition to the federal financial subsidy. 40 states reported that post-permanency support was available for kin in the 2022 survey.

The 2007 survey responses also described pockets of innovation that had expanded in 2022. For example, in 2007, few states noted having

kinship navigator programs. By 2022, 40 out of 46 responding states reported having kinship navigator programs serving at least part of their state.

Because of emerging knowledge in this field, some survey questions changed between 2007 and 2022. The phrasing of questions for the 2022 survey reflected knowledge gained from qualitative research about child welfare agencies' diversion practices and the concerns of researchers and advocates. For example, the 2007 question asked states whether children are diverted to kin after a decision is made to take the child into agency custody. The 2022 question was updated to reflect research that found many diversion arrangements are facilitated before an investigation is completed and before a decision about custody is made.

### States are collecting data and consulting with kin to inform decisions.

It is encouraging to see that many states are relying on both data and the voices of those who have experienced foster care to reform systems. The 2022 survey found that all responding states are collecting and using data. Child welfare agencies need timely and high-quality data to understand where disparities exist and whether reform efforts are achieving their intended results. In the 2022 survey, most states reported collecting and using administrative data to inform agency practice (44 states), inform state policy (45 states) and track case outcomes (45 states).

States frequently track data about licensed and unlicensed kinship caregivers and the children in their care. For licensed and unlicensed care, nearly every state collects data on children's race, ethnicity, age, geographic location, case opening and closing dates, location of child at case closure and caregivers' geographic location. Overall, data collected for licensed kin caregivers is nearly identical to data collected for non-relative licensed foster parents. Generally, states are least likely to collect data on the results of caregiver assessments for unlicensed caregivers.

Forty states incorporate the perspectives of youth, caregivers and birth parents in making decisions related to policies that affect kinship caregivers and their families. <sup>17</sup> For example, states report that their child welfare agencies are required to:

- work with a kinship caregiving advisory board or committee with representation from individuals with personal experience in kinship caregiving (22 states), with several states noting that these committees meet regularly and act as a resource for policymakers and the public to provide feedback on proposed policy changes;
- provide peer-to-peer support for licensed kinship caregivers (10 states); and
- hire caregivers or youth currently or previously living with kin for positions within the child welfare agency (two states).

In survey responses, states described other ways they work to understand the needs of kinship caregivers, such as conducting interviews and surveys of kinship caregivers.

However, data collection on kinship diversion arrangements is startlingly lacking: half of the states with diversion policies are not collecting any data on the children and families in diversion arrangements. Additionally, only three-quarters of responding states reported analyzing data by race and ethnicity in kinship caregiving arrangements.

Nonetheless, there is significant progress in the use of data and family engagement toward a more inclusive, equitable and supportive child welfare system. States should do more to engage kinship caregivers in policy development and ensure kin are compensated for their time and expertise.

#### SIGNFICANT CHANGES ARE STILL NEEDED

Although there has been positive change since 2007, steep disparities in service provision between types of kinship caregiving arrangements continue.

The 2007 and 2022 surveys asked states about financial assistance and other resources available to kinship caregivers and children in different caregiving arrangements. Similar concerns about inequitable support are reflected in the findings from both surveys.

The 2007 survey found nearly half of states (22) allowed unlicensed kinship caregivers to care for children in state custody without providing full monthly foster care maintenance payments, needing to rely instead on other resources such as TANF child-only monthly payments. Although the questions have changed slightly between survey iterations, the gap remains. In 2022, only 23 states reported providing financial assistance for unlicensed kinship caregivers to care for children, compared to the 44 states that provide it for licensed caregivers.

The surveys paint a similar picture for children in kinship diversion arrangements. Although the definition of diversion shifted slightly between surveys, both found that there are limited resources available to children and their caregivers in a kinship diversion arrangement. The 2007 survey analysis found:

"In situations where children are placed with kin to avoid state custody, most agencies provide basic services to kin. The basic services that are generally provided include referrals to available community-based services for the kinship caregiver; direct services typically are not provided by the child welfare agency unless there are safety or risk concerns in the home. If services are provided directly by the agency, they are often provided on a short-term basis. The most commonly reported services provided were information and referral, financial assistance from TANF child-only grants, and Medicaid."

The 2022 survey found significant differences in available services and support for children and caregivers in diversion arrangements and those in both licensed and unlicensed kinship care. For example, only 10 states reported providing financial assistance to those in diversion arrangements, compared to 23 in unlicensed care and 44 in licensed care.

The 2022 survey uncovered additional insights about states' understanding of the effect of these disparities. Some states noted that the disparities in access to services and resources, such as for children and caregivers in diversion arrangements or unlicensed kinship care, may contribute to the increased likelihood of placement disruption.

The 2022 survey showed the need to strengthen the availability of kinship navigator services. According to the survey, navigators are available only in certain jurisdictions and not statewide in 28 of the 40 jurisdictions with kinship navigator programs. In 32 states, eligibility for services is not limited to kinship caregivers who are involved with the child welfare system, meaning families outside the child welfare system are able to benefit from the program.

\*Data tables presenting select state-level detail on navigator availability supplement this brief.

## Every state should use disaggregated data to understand disparities in services and outcomes.

Disaggregated data are particularly important for understanding where disparities exist and for whom. There is a well-documented body of research that describes how Black and American Indian or Alaska Native children and families have long experienced disparities at every stage of child welfare involvement. <sup>18</sup> The 2022 survey asked specifically about whether states analyze data by race and ethnicity. Thirty-six out of 46 responding states reported analyzing data by race and ethnicity. In survey responses, states described some reasons for analyzing data this way, including to:

- identify disparities in service provision and outcomes;
- strive for equity in service provision;
- drive agency practice to meet the needs of populations served; and
- assist in the recruitment and retention of foster families that reflect the race and ethnicity of children coming into foster care.

In the 2022 survey, only 13 states reported changing or terminating policies that contributed to racial or ethnic disparities among kinship caregivers. Sixteen states reported having commissions or working groups tasked with addressing disparities among kinship caregivers.

As reported in Casey's brief on kinship diversion, much less information is gathered for children and caregivers in kinship diversion arrangements.<sup>19</sup> For the 33 states that allow kinship diversion in their policies, data collection is inconsistent. Only 17 states collect any data on kinship diversion arrangements, meaning that about half of the states that allow the arrangements do not collect any information on the children, caregivers or specifics of the arrangements. The 17 states collecting data on diversion include data on race, ethnicity and age of children in diversion arrangements. Only 12 states collect those data points for kinship caregivers. Fourteen states reported collecting data on safety plans, 15 states collect data on parent contact information, 14 states collect data on whether children receive services and 10 states collect data on whether caregivers receive services. Without data, jurisdictions are unable to understand if caregivers have appropriate resources, whether children are safe and how parental rights are protected. For a full breakdown of what administrative, caregiver and child data are collected in kinship diversion arrangements, see Diversion State Data Tables 5a and 5b.

# States should do more to include and support kin who are informing and leading systems improvement.

States are increasingly bringing the experiences of kinship caregivers into efforts to reform child welfare policies and practices. Although most states include the perspectives of youth, kin caregivers and parents, every state should do so and compensate them for their time. This level of engagement and support is far from being implemented broadly. Only two states hire caregivers or youth currently

#### Resources for Engaging Kinship Caregivers in Decision Making and System Improvements

- Grandfamilies & Kinship Support Network: Tips to Include Kinship/Grandfamilies in Programmatic Decision-Making
- The Administration for Children and Families: Engaging, Empowering, and Utilizing Family and Youth Voice in All Aspects of Child Welfare to Drive Case Planning and System Improvement
- The Annie E. Casey Foundation: Helping Communities and Child Welfare Systems Become Partners for Change
- Thriving Families, Safer Children: Equitable Compensation Taskforce Report

#### A Deeper Dive on Engaging Kinship Caregivers

To support systems and caseworkers in their efforts to engage kinship caregivers, the Annie E. Casey Foundation developed a five-part video training series: "Engaging Kinship Caregivers: Managing Risk Factors in Kinship Care." Led by nationally renowned kinship expert Joseph Crumbley, the series covers topics such as the unique dynamics of kinship families, strategies for building trust with kinship caregivers and techniques for addressing the emotional challenges of stepping in to care for children. By participating in these trainings, child welfare professionals can better equip themselves to meet the unique needs of kinship caregivers and the children in their care. The series also includes a discussion guide to help program directors, supervisors and trainers lead group sessions to deepen the learning experience.

Learn more about the training series at www.aecf.org/blog/engaging-kinship-caregivers-with-joseph-crumbley.

or previously living with kin for positions within the child welfare agency and only 10 provide peer-to-peer support for kinship caregivers. Only four states reported hiring peer kinship navigators.<sup>20</sup>

Although these mechanisms can help agencies understand the needs of kinship caregivers and refine policies to better meet those needs, only nine states report compensating kinship caregivers who serve on advisory boards or committees for their time.<sup>21</sup>

#### A TIME TO BUILD ON PAST GROWTH

New opportunities abound for jurisdictions to improve kinship care support. In late 2023, a new federal rule eased burdens for kin seeking to become licensed foster parents by allowing jurisdictions to implement kin-specific licensing standards, opening the door for more children living with kin to access the services and support associated with their caregiver's licensure.<sup>22</sup> As of August 2024, six states and three tribes have approved plans and two additional states and one additional tribe have submitted plans.<sup>23</sup>

In July 2024, the Children's Bureau updated its policy to allow jurisdictions to use Title IV-E funds to support efficient fingerprinting and speed up the necessary criminal background check process of kinship caregivers, in addition to other prospective foster or adoptive parents.<sup>24</sup> An additional July 2024 update indicated that "peer navigation programs provided as part of case management to support participation in Title IV-E prevention program or service" would qualify as an allowable administrative cost for Title IV-E.<sup>25</sup> Robust implementation of these new opportunities is critical to supporting kin and the children in their care.

Although it is encouraging to see that states have changed policies related to barriers preventing placement with and licensing of kin, more datadriven change must happen.

Young people, families, advocates, child welfare professionals and researchers are working together to implement a common set of priorities and policy recommendations to better support kinship care through a Kinship Unity Action Agenda.<sup>26</sup> The agenda will include collective action priorities that describe specific recommendations for resolving issues of

inequitable support for caregivers, changing the ways the public understands kinship care and addressing racial and cultural inequities in kinship care.<sup>27</sup>

The Family Ties series has elevated several findings from the state-by-state survey of kinship care policies to move the field forward:

- Reduce barriers to licensing and encourage jurisdictions to adopt kin-specific licensing standards. Barriers to licensing kin remain in place, such as criminal background checks that go beyond federal requirements and the inability of child welfare agencies to access federal funds while caregivers wait for licensing paperwork to be completed. Every jurisdiction should implement the 2023 kin-specific licensing rule, which can ease barriers to licensing for kin and open the door to the full array of resources available to children in non-relative homes.
- Provide equitable financial support for every child in the custody of the child welfare agency, regardless of kinship caregiver licensure status. Survey findings point to disparities in services and financial support between licensed and unlicensed kinship caregivers, meaning that all children and youth in child welfare custody do not receive the same support.
- Update kinship diversion policies to address concerns about access to services and parental decision making. Every jurisdiction with kinship diversion should have policies in place that, at a minimum, protect parental rights, keep children and youth safe and provide the necessary resources to caregivers. Disparities in available services and support are most dramatic for those in kinship diversion arrangements compared to licensed kin.
- Ensure every kinship caregiver has access to kinship navigation. Survey findings show that many states do not provide programs that connect kin to information and services statewide. In some cases, states also limit participation in these

navigation programs to kinship caregivers involved with the child welfare system. Opening services to all kinship caregivers will provide needed support and can keep children and families from unnecessary child welfare involvement.

- Collect and use comprehensive data for every type of kinship care arrangement. Without high-quality data, jurisdictions are in the dark about disparities in services and outcomes, and will not be able to make effective improvements. In particular, states should gather accurate data about kinship diversion arrangements to ensure the children, parents and caregivers involved in them are safe and supported and their rights are protected.
- Include kinship caregivers in policy design and implementation and compensate them for their time. Youth, kin and parents who have experienced the child welfare system are best positioned to understand what problems exist and inform policy and practice solutions. Jurisdictions should regularly consult and compensate people with personal experience, having their ideas drive reform efforts. Importantly, people with personal experience should be appropriately compensated for the work they do to inform systems change.

Federal, state and local governments have taken important steps to support children and their kinship caregivers. Reform efforts have contributed to more children being placed with family and achieving permanency. More resources — financial and otherwise — are becoming available to those caregivers and the children in their care. However, it is clear that the work is not done. As systems rely more on kin to support children in care, and as new federal opportunities emerge, it is time to fill the gaps and ensure that children in every type of kinship care arrangement have the resources they need to thrive.

#### **ENDNOTES**

- 1 The Annie E. Casey Foundation. (2024, March). Family ties: Analysis from a state-by-state survey of kinship care policies. Retrieved from www.aecf.org/resources/family-ties
- 2 Arkansas, Hawaii, New Hampshire, Tennessee, Vermont and Wisconsin did not complete the 2022 survey. Some participating states did not answer every question.
- 3 Allen, T., DeVooght K., & Geen, R. (2008, December). State kinship care policies for children that come to the attention of child welfare agencies. Child Trends. Retrieved from https://cms.childtrends.org/wp-content/uploads/2020/01/State-Assistance-to-Kin\_ ChildTrends 2008.pdf
- 4 Grandfamilies.org. (n.d.). Fostering Connections. Retrieved August 5, 2024, from www.grandfamilies.org/Topics/Federal-Laws/Fostering-Connections-Summary-Analysis
- 5 Grandfamilies.org. (n.d.). Fostering Connections.
- 6 Grandfamilies.org. (n.d.). Federal laws. Retrieved August 5, 2024, from www.grandfamilies.org/Topics/Federal-Laws
- 7 Grandfamilies.org. (n.d.). Family First. Retrieved August 5, 2024, from www.grandfamilies.org/Topics/Family-First-Summary-Analysis
- 8 Administration for Children and Families. (2024, May 10). Foster care legal representation: A rule by the Children and Families Administration (Press release). Retrieved from www.acf.hhs.gov/media/press/2024/finalized-rule-expands-public-agencies-ability-fund-legal-representation
- 9 American Bar Association Center on Children and the Law & Generations United. (2022, November). *Kinship promising practices*. Retrieved from www.grandfamilies.org/Portals/0/Documents/General%20Kinship%20Publications/kin-promising-practice%202022%20 Final.pdf
- 10 Allen, T., DeVooght K., & Geen, R. (2008, December). State kinship care policies for children that come to the attention of child welfare agencies. Child Trends. Retrieved from https://cms.childtrends.org/wp-content/uploads/2020/01/State-Assistance-to-Kin\_ ChildTrends 2008.pdf
- 11 Grandfamilies.org. (n.d.). Notification & engagement of relatives. Retrieved August 5, 2024, from www.grandfamilies.org/Topics/Notification-engagement-of-Relatives
- 12 The Annie E. Casey Foundation. (2024, August). Engaging and supporting kinship caregivers. Family ties: Analysis from a state-by-state survey of kinship care policies. Retrieved from www.aecf.org/resources/engaging-and-supporting-kinship-caregivers
- 13 The Annie E. Casey Foundation. (2024, March). Family ties: Analysis from a state-by-state survey of kinship care policies. Retrieved from www.aecf.org/resources/family-ties
- 14 Allen, T., DeVooght K., & Geen, R. (2008, December). State kinship care policies for children that come to the attention of child welfare agencies. Child Trends. Retrieved from https://cms.childtrends.org/wp-content/uploads/2020/01/State-Assistance-to-Kin\_ ChildTrends\_2008.pdf
- 15 Grandfamilies.org. (n.d.). Guardianship Assistance. Retrieved August 5, 2024, from https://www.grandfamilies.org/Topics/Guardianship-Assistance
- 16 Casey analysis of AFCARS. And, The Annie E. Casey Foundation. (2024, March).
- 17 This includes Illinois that responded "it depends" to the survey question.
- 18 Child Welfare Information Gateway. (2021). Child welfare practice to address racial disproportionality and disparity. U.S. Department of Health and Human Services, Administration for Children and Families, Children's Bureau. Retrieved from www.childwelfare.gov/resources/child-welfare-practice-address-racial-disproportionality-and-disparity
- 19 The Annie E. Casey Foundation. (2024, July). New insights on state kinship diversion policies. Family ties: Analysis from a state-by-state survey of kinship care policies. Retrieved from www.aecf.org/resources/new-insights-on-state-kinship-diversion-policies
- 20 The Annie E. Casey Foundation. (2024, August).
- 21 This includes Delaware and Rhode Island that responded "it depends" to this survey question. California did not report whether members are compensated.
- 22 Department of Health and Human Services, Administration for Children and Families, Administration on Children, Youth and Families, Children's Bureau. (2023, September 28). Separate licensing or approval standards for relative or kinship foster family homes (effective November 27, 2023). Federal Register, 88(187). Retrieved from www.federalregister.gov/documents/2023/09/28/2023-21081/separate-licensing-or-approval-standards-for-relative-or-kinship-foster-family-homes
- 23 Grandfamilies.org. (n.d.). Kin-specific licensing progress and documents. Retrieved August 5, 2024, from www.grandfamilies.org/ Portals/0/Kin%20licensing%20map/Kin%20licensing%20progress%20map.pdf
- 24 Department of Health and Human Services, Administration for Children and Families, Administration on Children, Youth and Families, Children's Bureau. (n.d.). 8.1B Title IV-E, administrative functions/costs, allowable costs foster care maintenance payments program, question 33. Child Welfare Policy Manual. Retrieved from www.acf.hhs.gov/cwpm/public\_html/programs/cb/laws\_policies/laws/cwpm/policy\_dsp.jsp?citID=36
- 25 Department of Health and Human Services, Administration for Children and Families, Administration on Children, Youth and Families, Children's Bureau. (n.d.). 8.6C.1 Allowable administrative and training costs, question 4. Child Welfare Policy Manual. Retrieved from www.acf.hhs.gov/cwpm/public\_html/programs/cb/laws\_policies/laws/cwpm/policy\_dsp.jsp?citlD=641
- 26 Generations United, American Bar Association Center on Children and the Law, & Think of Us. (2024). Kinship unity action agenda. Retrieved from www.gu.org/resources/kinship-unity-action-agenda
- 27 Generations United, American Bar Association Center on Children and the Law, & Think of Us. (2024).



