# CHILD IN NEED OF ASSISTANCE ADJUDICATION

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With many thanks and *much* credit to Judge Alan Allbee's wonderful juvenile Bench Book

## STATUTORY CRITERIA FOR CHILD IN NEED OF ASSISTANCE - DEFINITIONS

- (1) The Child. 'Child' means a person under eighteen years of age. Iowa Code Section 232.2(5). 'Child in need of assistance' means an unmarried child. Iowa Code Section 232.2(6). In determining such jurisdiction the age and marital status of the child at the time the proceedings are initiated are controlling. Iowa Code Section 232.61(2).
  - (1) Thus, in the event a child marries following the adjudication of child in need of assistance, the juvenile court does not lose jurisdiction. In Interest of H.G., 601 N.W.2d 8 (Iowa 1999).
  - (2) Even though a juvenile is under eighteen years of age, however, if married at the time of the adjudicatory hearing, no adjudication may enter. Marriage effectively emancipates the child for purposes of a subsequent child in need of assistance action.
- (2) A Parent. A biological or adoptive mother or father of a child but does not include a mother or father whose parental rights have been terminated. Iowa Code Section 232.2(39).
- (3) A Guardian. A person who is not the parent of a child, but who has been appointed by a court or juvenile court having jurisdiction over the child, to make important decisions which have a permanent effect on the life and development of that child and to promote the general welfare of that child. Iowa Code Section 232.2(21).
- (4) A Custodian. A stepparent or relative within the fourth degree of consanguinity to a child who has assumed responsibility for that child . . . or a person appointed by a court or juvenile court having jurisdiction over a child. Iowa Code Section 232.2(11).

# PETITION ALLEGING CHILD IN NEED OF ASSISTANCE (CINA)

Except for good cause shown, or unless the child is returned to the place where the child was residing, a petition alleging that a child is a CINA petition is required to be filed within three (3) days of an ex parte order for temporary removal of the child from the child's parent, guardian or custodian. Iowa Code Section 232.78(3)

**Persons who may file a CINA petition include** (pursuant to lowa Code Section 232.87(2)):

- Department of Human Services
- Juvenile Court Officer
- County Attorney

## SCHEDULING HEARING

#### (a) Approval of petition and scheduling hearing

 Court makes a preliminary determination as to whether, if proven, the facts contained in the petition constitute grounds for adjudication and that all necessary information is contained in the petition (Content required found in Iowa Code Sections 232.87 and 232.36 and must also meet the requirements of Iowa Code Chapter 598B, the Uniform Child Custody Jurisdiction & Enforcement Act).

#### (b) Once approved, hearing shall be held within sixty days of filing, unless good cause shown.

- Failure to comply does not result in automatic dismissal of the action, but failure may be urged as grounds for discretionary dismissal (Rule 8.11, Iowa Rules of Juv. Pro.)
- In Interest of NMW, 461 N.W. 2nd 478 (lowa App. 1990) parent not entitled to dismissal when hearing not held until 105 days after petition approved because no prejudice to parent was shown and parents did not bring issue to court until 30 days after 60 days had expired.
- PARENTS' ATTORNEYS CONSIDER WAIVING TIMELINES (PREFERABLY IN WRITING) IF YOU CAN TALK THE PARTIES INTO HOLDING THE CASE IN ABEYANCE.

#### (c) Prehearing conference

- Can take a stipulation then if parties in agreement, or parties can request trial.
- Typically hearing not set in for enough time to begin the trial (but, I've still seen it done!)
- Court may use that time to order discovery, set deadlines for production of discovery and exchange of exhibits and witnesses lists.

## APPOINTING COUNSEL FOR CHILD

## Typically the same person is appointed to serve both roles.

- Attorney advocates the child's expressed desires and intentions if child can articulate her position.
- Guardian ad Litem advocates for the best interests of the child (BIC).

#### Ethical issues to consider:

- Should different kids have different attorneys/GALs?
- Should the roles be bifurcated?
  - lowa Code Section 232.89(4) Where the same person cannot ethically serve both roles, a separate GAL can be appointed.

## GAL'S STATUTORILY MANDATED DUTIES PURSUANT TO 232.2(22) –

 Conducting in person interviews with the child, and interviewing each parent, guardian, or other person having custody of the child, if authorized by counsel.

- Conducting interviews with the child prior to any court-ordered

hearing

 Visiting the home, residence and any prospective home or residence, including each time placement changes

 Interviewing any person providing medical, mental health, social, educational, or other services to the child, before any courtordered hearing

 Obtaining firsthand knowledge, if possible, of the facts, circumstances, and parties involved in the matter in which the person is appointed GAL.

- Attending any hearing in the matter in which the person is

appointed as GAL

 If the child is required to have a transition plan developed, assisting in the development of that plan.

## COUNSEL FOR PARENT, GUARDIAN, OR CUSTODIAN

- 1. Parents, guardians, or custodians identified in the petition have a right to counsel in CINA proceedings. Iowa Code Section 232.89(1). (Typically the Summons and Notice of Hearing provides notification to the parent, guardian, or custodian of right and possibly application for counsel).
- 2. Indigent parents/guardians/custodians are required to repay the cost of such representation at rate of \$60/hour. 493 IAC Section 12.6, Iowa Code Section 815.9.
  - 1. Really important to inform parents of this up front so they are aware of what they're getting into.
    - State v. Sluyter defendant's obligation to reimburse the state for fees and costs is not enforceable by contempt.
    - 2. State v. Dudley We should be advocating that our indigent clients are not able to pay, and we should be scrutinizing what they're charged.

### SUMMONS AND NOTICE OF HEARING

- After the petition is filed, the court shall issue and serve summons, subpoenas, and other process as provided in section 232.37.
  - Persons summoned are required to attend
    - Should be served personally by sheriff.
    - Should have copy of CINA petition attached.
    - Service shall be made not less than 5 days before times focused for hearing.
  - Typically the child and the person having physical custody of the child will be summoned to appear, while other parties are simply provided notice.
    - If properly summoned and fail to appear without reasonable cause, the parties may be cited for contempt, the adult arrested, and the child taken into custody.
- Persons given notice of the hearing are permitted to attend but are not required to do so. Failure to attend does not result in contempt or arrest.
   Proceeding may, however, take place in their absence if they fail to attend after having been given appropriate notice.
  - Persons given notice = known parents, guardians, or legal custodians, any agency, facility, institution, or person – including foster parent, relative caretaker, or individual providing pre-adoptive care, with whom a child has been place.

# REPORTING AND/OR RECORDING REQUIRED

Unless waived by all parties, all adjudicatory and other hearings in child in need of assistance cases are to be reported either by a court reporter or tape recorded. Child's counsel - not the child - may waive the requirement on the child's behalf. Iowa Code Section 232.94.

- In 2009, the Iowa Courts have begun use of digital tape recording of juvenile court hearings in lieu of the traditional stenographic record made by certified court reporters.
- If a hearing is interpreted by a language interpreter, the non-English testimony also must be tape-recorded (Iowa Code Section 622A.8, Rule 14.11, Iowa Court Rules).

## HEARINGS GENERALLY OPEN TO PUBLIC - EXCEPTION

- Misconception that CINA hearings are confidential and not open to the public
- Adjudicatory hearings open to the public unless the court, upon its own motion or motion of one the parties, closes the hearing.
- In order to close the hearing, court must find that the possibility of damage/harm to the child outweighs the public interest in an open hearing. lowa Code Section 232.92
  - If you want the hearing closed, may be wise to file a motion or request a hearing on the issue beforehand.

### BURDEN OF PROOF

The Petitioner bears the burden of proving the allegations that the child is a CINA by clear and convincing evidence (statutory grounds in section 232.2(6)).

- More rigorous standard to meet than preponderance of the evidence standard, but less rigorous than beyond a reasonable doubt.
- Basically, Petitioner must prove that allegations are substantially more likely than not that it is true.
  - Does 'clear and convincing' always feel like the standard?

**Court must ALSO find that its aid is required.** (Meaning of that phrase is not particularly obvious, legislature didn't provide much guidance.)

- According to the lowa appellate court, the determination whether the court's aid is not required is to be narrowly construed.
- In Interest of GR, 348 NW2d 627 (lowa 1984) Dismissal is proper on this ground in only three situations:
  1) juvenile court does not have treatment or service available to correct child's particular problem; 2) an alternative system of services is available to provide comparable treatment w/out resort to the juvenile court; 3) resources available to the juvenile court to correct the child's problems, but experts predict little likelihood of success w/out extensive cooperation from the parents and the child, and that cooperation is not forthcoming.
- Maybe make this argument at the dispositional hearing because court can then consider a much more broad record - the social history, DHS report, results of mental/physical exam, etc.

### HOLDING ADJUDICATION IN ABEYANCE

- Vast majority of adjudications, you're not going to trial.
- As a parents' attorney, can you convince the Petitioner to hold the case in abeyance?
  - FTM to come up with terms and conditions for dismissal?
  - Waive the 60 day time frames in order to work through those terms and conditions?

## STIPULATING TO ADJUDICATION

- As parents' attorneys, keep the stipulation as narrow and limited as possible.
- Pay very close attention to the grounds alleged are they actually applicable?
  - Exp. Drugs found in the basement of the house where the adult son was living, so the petition includes every reference to drugs in the CINA code:
    - BUT, is there any evidence your client was actually using?
      - Hairstat, UA, BAC
    - BUT, is there any evidence of manufacture or KNOWLEDGE of manufacture?
- Can you get the county attorney to dismiss harsher grounds by agreeing to a case plan that addresses those allegations?
  - Mom's tests came back clean, there was no evidence of meth, so let's dismiss those alleged grounds BUT agree that mom will still get a SAE and follow through on any recommended treatment.

## 'ALFORD' STIPULATION

- Enter into a stipulation of adjudication indicating you do NOT admit (or, in fact, actively deny) the allegations in the petition, but rather acknowledge if the matter proceeded to trial, the child would likely be adjudicated a CINA under whatever specific grounds are alleged/agreed to.
- Encourage a written stipulation perhaps specifying, for example, that the criminal investigation is ongoing and client has been advised not to testify.
  - For the sake of abuse report appeals, written 'Alford' stipulations can be introduced as an exhibit, and do a good job of making clear that your client is *not* admitting the allegations.
  - Makes your clients feel better when they inevitably get an order indicating that they stipulated, but providing no context for that stipulation.
    - Filing 1.902(4) motions to amend findings (mine have been denied).

## STIPULATION WITH SEPARATE FILING OF YOUR CLIENT'S VERSION OF FACTS

- Facts in the petition often present an extremely one-sided, sometimes very inaccurate, view of what transpired (from your client's perspective).
  - 'Father repeatedly failed to cooperate with DHS and law enforcement and thwarted investigative efforts.'
    - Vs. 'Given the ongoing criminal investigation, and under unequivocal direction from counsel, the Father elected to invoke his right to remain silent.'
- Is this always wise? Can this come back to bite you/your client later?
  - Making sure you know the facts very well and are not contradicting your client's previous statements.

## TAKING IT TO TRIAL JUVENILE COURT RULES OF EVIDENCE

- Evidence admissible under the rules of evidence applicable to the trial of civil cases is admissible in CINA adjudicatory hearings, except as provided in section 232.96. Iowa Code Section 232.96(3).
  - Adjudication evidence standard is stricter than the dispositional hearing standard, where ALL relevant and material evidence is admissible.
  - Still, rules of procedure are to be liberally applied such that all probative evidence is admitted in juvenile cases. In Interest JRH, 358 NW2d 311 (lowa 1984)
  - CINA cases are equitable in nature in equity cases, objections to testimony are ordinarily not ruled on, and all evidence is received subject to objections so the entire record may be available to the reviewing court on appeal. State v. Scarlett, 231 NW2d 8 (Iowa 1975)

## RULES OF EVIDENCE

- General rule against admissibility of hearsay statements EXCEPT
  - Present sense impressions
  - Excited utterances, then existing mental, emotional, or physical state,
  - Statements for purposes of medical diagnosis or treatment,
  - Recorded recollection
  - Records of regularly conducted activity.
- Exceptions to the rules of evidence provided in Iowa Code Section 232.96(4), (5), and (6) are substantial in nature -have special application only to child in need of assistance adjudicatory hearings, unless otherwise noted.
  - Reports of child abuse
    - These are the allegations made to the Department NOT the assessment report of the child protective worker made following the assessment.
    - Don't need the actual reporter can come in as hearsay through the CPW.
      - Whether by in-court testimony by a child protective worker or other person or through the introduction of documentary evidence, the identity of the person who initially reports suspected child abuse to the Department of Human Services shall not be revealed.
    - Report alone not sufficient to support CINA finding, except if adjudication = based on stipulation of attorneys for child and parents. Iowa Code Section 232.96(4).

# RULES OF EVIDENCE – EXCEPTIONS, cntd.

#### Communication between husband and wife

- Traditionally privileged and not admissible
- BUT, in CINA adjudicatory hearings, the fact that the evidence solicited is the communication between husband and wife will not serve as grounds for exclusion.
  - Privilege = inapplicable where injury to a child is involved in all civil or criminal proceedings. Iowa Code 232.74.

#### Privileged communication between patient and physician

- The privilege for confidential communications between physician and patient is NOT a ground for exclusion of testimony regarding such communications in an adjudicatory hearing in a CINA case – lowa Code 232.96(5).
  - Patients' interest in proper diagnosis and treatment takes back seat to prevailing interest of proper care and treatment of child in CINA.
- Again, Privilege = *inapplicable where injury to a child* is involved in all civil or criminal proceedings. Iowa Code 232.74.

#### Privileged information with a mental health professional

Not applicable in CINA proceedings

#### Regularly kept records

• Court must find the record was made in the regular course of a business, at or about time of the act or event recorded, sources of info and method and circumstances of preparation were trustworthy, not inadmissible for reasons other than hearsay rule

# RULES OF EVIDENCE EXCEPTIONS, cntd.

#### Report or tape by DHS, JCS, peace officer or hospital

- Probably the most important exception, considering what can come in with it!
- Exception for 'a report, study, record, or other writing or an audiotape or videotape recording made by the DHS, a juvenile court officer, peace officer, or hospital relating to a child.' Iowa Code Section 232.96(6)
  - Provided that the content is relevant and material and its probative value outweighs the danger of unfair prejudice to the child's parent, guardian, or custodian. *Id*.
- Without prior consent of the parties, social history is not to be considered at adjudicatory hearing (but clearly admissible in dispositional hearing). Iowa Code 232.99.
  - Where the objecting party makes reasonable efforts to obtain the presence of the maker of the report, but is unable to do so, the court may continue the case until that person is available of exclude all or a portion of the report from evidence. In the Interest of Long, 313 NW2d 473(Iowa 1981).
  - BUT, later cases have clarified that the 6<sup>th</sup> A right to confrontation of witnesses only applies to criminal cases not CINA cases. In the Interest of ADL, 497 NW2d 178 (Iowa App. 1992)
  - 232.96(6) contemplates the parties will have an opportunity to examine and cross examine the maker of the report if not for purposes of admissibility, for the weight which the court should give report.
  - BUT, calling the report preparer is not a precondition to admitting the report.
  - Portion of abuse report may be deemed inadmissible if contains results of polygraph exam that the parties did not agree were admissible. In Interest of ADL.

## TYPES OF EVIDENCE & UNCONTRADICTED TESTIMONY

#### **Evidence can be direct or circumstantial:**

- The weight to be given to any evidence is for the trier of fact to decide.
  - Direct Evidence the testimony of one who claims actual knowledge of a fact, such as an eyewitness.
  - Circumstantial Evidence proof of a chain of facts and circumstances indicating the truth or falsity of the allegations.

#### **Uncontradicted Testimony:**

 While the trier of fact is not bound to accept any testimony as true merely because it is uncontradicted, it may not totally disregard such evidence. In Interest of G.R., 348 N.W.2d 627 (lowa 1984).

# CREDIBILITY OF WITNESSES (Iowa Civil Jury Instruction Standard)

- The trier of fact must try to reconcile any conflicts in the evidence, but if that is not possible, the evidence found more believable should be accepted.
- The trier of fact may believe all, part or none of any witness's testimony.
- There are many factors which the trier of fact may consider in deciding what testimony to believe, for example: (1) whether the testimony is reasonable and consistent with other believable evidence; (2) the witness's appearance, conduct, age, intelligence, memory, and knowledge of the facts; and (3) the witness's interest in the trial, their motive, candor, bias & prejudice

## **OPINION TESTIMONY**

**LAY TESTIMONY.** The Rules of Evidence permit lay witnesses to express opinions if based upon the witnesses' perception and provided it is helpful to the determination of a fact in issue. Rule 5.701, Iowa Rules of Evidence.

**EXPERT TESTIMONY.** The courts have adopted a fairly liberal rule regarding the use of expert testimony in child in need of assistance cases.

- In general, such opinion testimony will be admitted if it is of a nature that will aid the finder of fact and is based upon special training, experience, or knowledge with respect to an issue in controversy. State ex. rel. Leas in Interest of O'Neal, 303 N.W.2d 414 (lowa 1981).
- Expert testimony is not admissible unless the witness is shown to be qualified and the facts upon which the expert bases his or her opinion are sufficient to enable a witness so qualified to express an opinion which is more than mere conjecture. Id.
- Very liberally construed A registered nurse, a child and family therapist, a child and adolescent psychiatrist, and the director of a pediatric residence program at a major hospital were all found competent to give expert testimony regarding the potential harm to a child given the mental and emotional condition of the child's mother. In the Interest of Long, 313 NW2d 473 (lowa 1981).

### OPINION – EXPERT TESTIMONY cntd.

- (1) Truthfulness of Child Abuse Victim. An expert witness in a child sexual abuse case is not allowed to testify that children seldom testify falsely about such matters as the same invades the province of the finder of fact to determine the credibility of the witnesses. Expert testimony is admissible, however, regarding criteria by which the expert, a child psychologist, verifies the truthfulness of sexual abuse allegations and explaining reasons for delay by some children in reporting sexual abuse. State v. Fox, 480 N.W.2d 897 (lowa App. 1991); State v. Myers, 382 N.W.2d 91 (lowa 1986).
- (2) Post-traumatic Stress Syndrome. The testimony of a psychologist was properly admitted to explain the effects of posttraumatic stress syndrome and the typical reaction of a rape victim where the expert did not offer an opinion on whether the victim had been raped and independent evidence showed that the victim experienced some symptoms of posttraumatic stress syndrome. State v. Gettier, 438 N.W.2d 1 (lowa 1989).
- (3) Delayed Reporting Syndrome. Testimony of an expert witness was properly allowed as to why child sex abuse victims often delay reporting crime where the court limited the testimony only to typical psychological symptoms. State v. Payton, 481 N.W.2d 325 (lowa 1992).
- (4) Sexual Offender Profile. Expert testimony of the typical sexual offender profile and how defendant fits that profile is improper. State v. Spilger, 508 N.W.2d 650, 652 (Iowa 1993).

### RELEVANCE

- Evidence must be relevant to be admissible. In other words, it must have a tendency to make the existence of any fact that is of consequence to the determination of the action more or less probable than it would be without the evidence. Rule .5401, Iowa Rules of Evidence.
  - Relevant evidence may still be excluded, however, if its probative value is substantially outweighed by the danger of unfair prejudice, undue delay, being a waste of time, or being a needless presentation of cumulative evidence. Rule 5.403, Iowa Rules of Evidence.
  - This is the same standard present in Iowa Code Section 232.96(6) wherein a report containing hearsay may be excluded if it is unfairly prejudicial to the adverse party.

### PRIOR BAD ACTS

Evidence of a person's character or a trait of his or her character is not admissible for the purpose of proving that he or she acted in conformity therewith on a particular occasion. Rule 5.404(b), lowa Rules of Evidence.

- The introduction of testimony by a physician who profiled an abusive parent and other witnesses who testified that the parent possessed some or all of those personality traits is improper and should be excluded under Rule 404(A). In the Interest of D.L., #85-1865 (lowa 1986).
- In addition, evidence of other crimes, wrongs, or acts are not admissible to prove the character of a person in order to show he or she acted in conformity therewith. Rule 5.404(b), Iowa Rules of Evidence.
- Prior bad acts may be admissible to show proof of motive, opportunity, intent, preparation, plan, knowledge, identity, or absence of mistake or accident. Id.

## JUDGE'S PECULIAR KNOWLEDGE

- A juvenile judge may rely on general knowledge commonly possessed by human kind, but he or she cannot decide issues of fact based upon a peculiar individual knowledge gained outside the trial in issue.
- The extrajudicial knowledge extends to knowledge obtained by the judge attending medical seminars.

## CHILD'S COMPETENCE TO TESTIFY

- A child of any age is presumed competent to testify. Rule 5.601, Iowa Rules of Evidence. Thus it is no longer necessary to ask a child preliminary questions to determine their competency.
- Where a challenge is made to the competency of a child to testify, however, a colloquy or voir dire examination of the child may be used. The court may also consider other evidence presented or expert testimony.
- The inquiry into the child's competency to testify, if necessary, should be designed to determine (a) the child's ability to understand the nature of questions; (b) the child's ability to formulate answers and communicate recollections of the incidents; and (c) the child's understanding of the responsibility to tell the truth

### NO ABSOLUTE RIGHT TO BE PRESENT

- Incarcerated [County Jail] Parent A parent who is incarcerated in a county jail has no absolute right to be present for a child in need of assistance hearing and has no right to the appointment of a guardian ad litem to represent his or her interests under Rule 1.211 of the Iowa Rules of Civil Procedure. In Interest of T.C., 492 N.W.2d 425 (Iowa 1992).
  - Rule 1.211 by its terms applies only to a party confined in a penitentiary, reformatory, or any state hospital for the mentally ill.
  - Confinement in a private hospital for substance abuse is not a state hospital for the mentally ill and does not qualify the party for appointment of a guardian ad litem. Id. at 428.
- Imprisoned Parent Guardian ad Litem A parent who is in prison and subject to Rule 1.211 of the lowa Rules of Civil Procedure, while having the right to the appointment of a guardian ad litem and the presentation of evidence through deposition or otherwise, is not necessarily entitled to be personally present at the hearing. In such case due process does not require transportation of the imprisoned parent to the hearing. In Interest of J.S., 470 N.W.2d 48, 52 (Iowa App. 1991).
  - Where the district court is willing to provide an order for the imprisoned parent's transportation to a
    juvenile hearing, supervision during that hearing, and return following hearing, the same is certainly
    preferred to merely having the parent represented and able to present testimony by deposition or by
    telephone.
  - At times the Iowa Department of Adult Corrections has been unwilling to accept a transportation order entered by a judge whose is without jurisdiction over the adult criminal proceeding, e.g., an Associate Juvenile Judge. Thus the order by a District Court judge may be necessary.
  - Interestingly, the federal courts are willing to accept a Writ of Habeas Corpus signed by a juvenile court judge, which requires the transportation of a federal prisoner to a juvenile court proceeding.

## TESTIMONY OF CHILD TAKEN OUTSIDE PRESENCE OF PARENT

- Given that there may be circumstances in which a child witness including the child in interest may be hesitant to testify directly in front of a parent who is accused of abusing or neglecting a child, the juvenile court is given broad discretion to allow a child to testify in the absence of their parent. Iowa Code Section 232.38 & 232.91.
- The court is not required to make a finding of unavailability similar to that required in a criminal case against the parent in order to allow the child to testify in a protected manner, e.g., by closed circuit television from another room. However, if the child would be so emotionally traumatized by having to testify before a parent such that they would be considered unavailable, the juvenile court would be well within its authority to temporarily excuse the parents.
- The court should afford counsel for the parent the opportunity to see and hear the child's testimony directly and to consult with the absent parent prior to cross-examination.

### APPEALS OF ADJUDICATION ORDER

## A pre-dispositional order of adjudication in a juvenile proceeding is not 'final' and thus not appealable as a matter of right.

• In Re Long, 313 N.W.2d 473, 475 (lowa 1981): "[W]e believe that speedy disposition is crucial in [CINA] cases. If a bare adjudication order were 'final,' an appeal could unduly delay a disposition which is essential to the welfare of the child. A multiplicity of appeals may be avoided by holding that the dispositional order is the only 'final' order subject to appeal.... An appeal may be avoided entirely by holding that only the dispositional order is a 'final,' appealable order.... If the juvenile court were to order [that the child remain with the parent], the parent would probably have little desire or incentive to appeal. Thus, a requirement that appeals in [CINA] cases be taken only from dispositional orders would further the goal of judicial economy, as well as the goal of making disposition as prompt as possible for the benefit of the child." Id. at 475.

### THANK YOU!

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