

Follow-up report
February 2024

Representation for Children and Youth in Child Protection Cases

Office of Performance Evaluations
Idaho Legislature



Rakesh Mohan directs the Office of Performance Evaluations.

Amanda Bartlett and Mackenzie Moss conducted this follow-up with assistance from Lauren Bailey and quality control by Sasha O’Connell.

Leslie Baker copyedited the report.

Technical assistance was provided by Stacy L. Pittman of Pittman Law, LLC.

Senator Melissa Wintrow (D) and Representative David M. Cannon (R) cochair the committee.

Office of Performance Evaluations

Established in 1994, the legislative Office of Performance Evaluations (OPE) operates under the authority of Idaho Code §§ 67-457-464. Our mission is to promote confidence and accountability in state government through independent assessment of state programs and policies. Professional standards of evaluation and auditing guide our work.

Joint Legislative Oversight Committee 2023-2024

The eight-member, equally bipartisan Joint Legislative Oversight Committee (JLOC) selects evaluation topics; OPE staff conduct the evaluations. Reports are released in a public meeting of the committee. The findings, conclusions, and recommendations in OPE reports are not intended to reflect the views of the Oversight Committee or its individual members.

Senators



Melissa Wintrow

C. Scott Grow

Dave Lent

James D. Ruchti

Representatives



David M. Cannon

Douglas T. Pickett

Ilana Rubel

Steve Berch

Follow-up report



The stakes are high in child protection cases.¹ Parents and children have a constitutional right to live together. However, the state can intervene when the health and safety of the child is compromised because of abuse, neglect, abandonment, or an unstable home environment.² Once a child protection case is established, decisions are made about the child’s safety, placement, health, education, and well-being. As a result, the child faces changes in their home, belongings, relationships, community, and future. Zealous advocacy on behalf of the child is a safeguard to ensure that the child’s best interest remains at the center of every decision.

In Idaho, this advocacy is provided by court-appointed guardians ad litem, who are primarily volunteer court-appointed special advocates (CASA) and attorneys. In our 2017 report, *Child Welfare System*, we found that guardian ad litem programs faced the following implementation challenges: (1) program staff struggled to recruit enough volunteers to adequately serve all children, (2) volunteers were not consistently familiar with the legal system and had different levels of monitoring and report writing skills, and (3) limited resources restricted training and support for volunteers.

In our 2018 report, *Representation for Children and Youth in Child Protection Cases*, we found that Idaho did not have a mechanism to ensure that all children and youth had an appointed advocate. We found that a coordinated effort from many stakeholders was needed to strengthen policies and implementation efforts. We reaffirmed the need for a system-wide oversight entity and had four additional policy considerations.

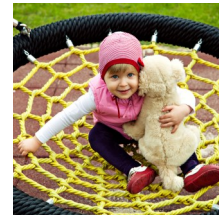
1. *Troxel v. Granville*, 530 U.S. 57, 65 (2000); *IDHW v. Doe* (2023-25), 538 P.3d 805, 816 (2023); *Wallis v. Spencer*, 202 F.3d 1126, 1136 (9th Cir. 2000); *Kirkpatrick v. Cnty. of Washoe*, 843 F.3d 784, 788 (9th Cir. 2016).

2. Idaho Code § 16-1603.

This follow-up evaluation revisits key findings and reports on progress made in addressing the policy considerations in our 2018 report. To conduct this follow-up, we gathered information from the Administrative Office of the Courts and the seven nonprofit organizations that provide guardian ad litem services. We also spoke with the State Public Defense Commission, the newly appointed State Public Defender, and the independent guardian ad litem in the Third Judicial District.

What will this follow-up cover?

To begin this report, we provide a summary of state and federal requirements for court-appointed advocates. We then revisit the policy considerations from our 2018 report and assess whether the considerations were addressed. Our considerations can be summarized as:



- 1. Strengthen the state's role from that of grant administration to capacity building and ensure every child in every case is appointed a guardian ad litem, an attorney, or both as required by statute**
- 2. Revisit the statutory definition of guardian ad litem and consider whether to expand the definition to include program employees in addition to volunteers**
- 3. Explore opportunities to expand support services to attorneys appointed to abuse and neglect cases**
- 4. Enhance training requirements for appointed attorneys**

In 2017 and 2018, we also recommended establishing a legislative oversight committee to ensure ongoing accountability, visibility, and accessibility of all child welfare partners and stakeholders. We will address the status of this recommendation in a subsequent follow-up report.

Court-appointed advocates play a crucial role in the child protection system.

In 2018, we found that Idaho’s system of providing court-appointed guardians ad litem and attorneys to children and youth in abuse and neglect cases was a localized patchwork of organizations that were stretched thin. The guardian ad litem programs had problems with fundraising and recruiting and with training enough volunteers.

Federal and state law recognize the importance of appointed child advocates. Federal law requires that states have procedures for appointing guardians ad litem or attorneys to every child in a protection proceeding as a prerequisite to receiving grant funding.³ The Idaho Child Protective Act requires that courts appoint a guardian ad litem, an attorney, or both to every child in a child protection proceeding, as seen in exhibit 1.

Exhibit 1

A child’s age determines their appointed advocate.



*When statute directs the appointment of a guardian ad litem, it also requires that the guardian ad litem have or be appointed an attorney.

Source: Office of Performance Evaluations' visualization of criteria found in Idaho Code § 16-1614.

3. The Child Abuse Prevention and Treatment Act (CAPTA), 42 U.S.C.A. § 5106a(b)(2)(B)(xiii) (“Every case involving a victim of child abuse or neglect which results in a judicial proceeding, a guardian ad litem, who has received training appropriate to the role, including training in early childhood, child, and adolescent development, and who may be an attorney or a court-appointed special advocate who has received training appropriate to that role (or both), shall be appointed to represent the child in such proceedings.”).

Guardians ad litem are appointed for children 11 years and younger.

By statute, courts shall appoint a guardian ad litem to children 11 years and younger, unless a guardian ad litem is not available.⁴ In that case, an attorney shall be appointed. Courts may appoint both a guardian ad litem and an attorney when appropriate. When a guardian ad litem is appointed, the court shall also appoint an attorney to represent the guardian ad litem if they do not already have one.

Appointed attorneys represent youth 12 years and older.

By statute, courts shall appoint an attorney to youth 12 years and older, unless an attorney is not practical or appropriate.⁵ In that case, the court may appoint a guardian ad litem and an attorney for the guardian ad litem. When appropriate, courts may appoint both a guardian ad litem and an attorney to the young person.

Guardians ad litem advocate for the best interests of children.

In Idaho child protection cases, a guardian ad litem is typically a volunteer who advocates for a child’s best interest, as seen in exhibit 2.⁶ When a guardian ad litem has an attorney, they have the rights of a party and can file motions, pleadings, and briefs.⁷

4. Idaho Code § 16-1614(1).

5. Idaho Code § 16-1614(2). (“To the extent that a young person can understand and express their wishes about various decisions being made in a child protection case, they can direct their counsel. For some young people, their capacity to direct their own counsel is diminished because of trauma, a mental health diagnosis, or some other reason. Even when a young person has trouble making one type of decision, they may still be competent to make other decisions. The Idaho Rules of Professional Conduct explains that “children as young as five or six years of age, and certainly those of ten or twelve, are regarded as having opinions that are entitled to weight in legal proceedings concerning their custody.”) IRPC 1.14 (comment 1).

6. In federal law and other states, guardians ad litem in child protection cases can also be attorneys who make judgments about and advocate for the child’s best interest. 42 U.S.C.A. § 5106a(b)(2)(B)(xiii).

7. Idaho Code § 16-1634.

Exhibit 2

Guardians ad litem and attorneys play different roles.

<p>Guardians ad litem</p> 	<p>Volunteers in nonprofit organizations</p> <p>Advocate for the best interests of children</p> <p>Have statutory duties, powers, and training requirements</p>	<p>Attorneys</p> 	<p>County funded</p> <p>Represent their client's expressed wishes</p> <p>Have minimal direction in statute but must comply with rules of professional conduct</p>
--	---	---	---

Source: Office of Performance Evaluations' visualization of criteria found in Idaho Code.

The child’s best interest is determined through an independent assessment by the guardian ad litem. The best interest assessment may differ from the expressed wishes of the child. By statute, the guardian ad litem’s report must include the child’s expressed wishes about permanency when the child can communicate their wishes.⁸ However, if a child disagrees with the guardian ad litem’s recommendations to the court, the child does not have a way of presenting evidence to support their position. The court may provide an opportunity for the child to speak, but the child would face the challenge of trying to effectively communicate their preferences on their own.⁹

Guardian ad litem programs are nonprofit organizations.

Idaho has seven guardian ad litem programs, one in each judicial district. There is also one independent guardian ad litem operating in the Third Judicial District who carries a small caseload in four counties, does not receive state funding, and does not report to the Administrative Office of the Courts.¹⁰

8. Idaho Code § 16-1633(2).

9. Jessalyn R. Hopkin & Stacy L. Pittman, *Child Representation: The Value of Being Seen, Heard, and Represented*, 66 *ADVOC.* 46 (2023).

10. The guardian ad litem in the Third Judicial District started a nonprofit in 2019 called GAL of Idaho. In July of 2023, GAL of Idaho was appointed to thirteen children in Payette, Owyhee, Washington, and Adams counties.

Statute requires attorneys for guardians ad litem.

Adequate legal expertise is essential to properly advocating for the child’s best interest in court. Guardians ad litem need to understand their right to access information from the Department of Health and Welfare, schools, health care providers, and other relevant sources. They also need to know how to make reports to the court. Guardians ad litem who have legal representation can ask the court to make decisions on behalf of the child and contest placement.¹¹

Idaho Code § 16-1614 subsections 1 and 3 state that counties must pay for an appointed attorney for the guardian ad litem unless they already have one. We asked the guardian ad litem programs in each judicial district whether their volunteers had access to attorneys and how they were provided. The programs reported that in 2023, 24 out of 44 counties paid for appointed attorneys for guardians ad litem. These attorneys were either county public defenders or contracted attorneys. Three additional counties provided at least partial financial support for appointed attorneys for guardians ad litem. The remaining 17 counties relied on pro bono attorneys. Recent changes to state public defense services will affect the provision of appointed attorneys to guardians ad litem and is discussed more on page 18.

Appointed attorneys represent their client’s expressed wishes.

Attorneys appointed to children owe the same duties they would owe adults.¹² Clients have the right to set their goals and objectives, and attorneys represent their expressed wishes in court, as seen in exhibit 2.¹³ Attorneys must consult with their clients, provide candid advice, and ensure confidential communications.¹⁴ Attorneys should actively engage in age-appropriate guidance to help their clients make good decisions, even though children may have diminished capacity because of their age, trauma, or other constraints.¹⁵

11. Idaho Code § 16-1619(12); Idaho Juvenile Rule 43.

12. Debra Alsaker-Burke, *Representing the Child in A Child Protection Case: An Ethical Conundrum*, 52 *ADVOC.* 18 (2009).

13. Idaho Rule of Professional Conduct 1.2.

14. Idaho Rule of Professional Conduct 2.1 & 1.6.

15. Idaho Rule of Professional Conduct 1.14 & 1.4, (comment 6).

What does best interest versus expressed wishes look like in practice?



In response to our 2018 survey, one judge explained how expressed wishes and best interest can sometimes be in conflict:

“ Sometimes the child has wishes that are or may be contrary to their best interests. The attorney is able to vocalize the child’s wishes, while [the guardian ad litem] is able to present what may really be in the child’s best interest.

In the same survey, a different judge explained the benefits of attorney representation:

“ Attorneys are better at presenting testimony and evidence. [They are] more likely to present relevant facts on specific issues in controversy.

Appointed attorneys have minimal direction in statute.


Unlike the guardians ad litem, Idaho statute provides minimal direction on how attorneys should represent children in abuse and neglect cases. Idaho statute is silent on child protection-specific training for attorneys. Federal law requires that any advocate appointed to represent children receives “training appropriate to the role, including training in early childhood, child, and adolescent development.”¹⁶ The number of hours or type of training is not specified.

The Idaho State Bar requires attorneys to complete 30 hours of continuing legal education every three years. There are no specific requirements for representing children in abuse or neglect cases. The Idaho State Bar gives attorneys the opportunity to obtain a child welfare specialist certification through the National Association of Counsel for Children.

16. 42 U.S.C.A. § 5106a(b)(2)(B)(xiii).

Idaho still does not have a system to ensure every child has a court-appointed advocate.

As important as robust child advocacy is, no single agency is responsible for ensuring that every child has a court-appointed advocate. In our 2018 report, we found that some children did not have an appointed advocate at all. We recommended that the Legislature identify an entity responsible for ensuring consistent practice, including that every child had an appointed advocate, and clearly define its role in statute. There is still no entity responsible for ensuring that every child has a court-appointed advocate, leaving the same potential gaps that we identified in 2018. This consideration has not been addressed.

	2018 Consideration	Status
<p>Strengthen the state’s role from that of grant administration to capacity building and ensure every child in every case is appointed a guardian ad litem, an attorney, or both as required by statute</p>	<p>Improvements were made in funding but ongoing concerns about gaps and program continuity remained</p>	

Judges are responsible for appointing either a guardian ad litem, an attorney, or both to children and youth in abuse and neglect cases. The Administrative Office of the Courts serves as a grant administrator for the guardian ad litem programs and plays no role in the appointment of attorneys for children or in the day-to-day operations of the guardian ad litem programs. The guardian ad litem programs only receive information about cases to which they are appointed. Because child protection cases are closed, the programs cannot see case information about children to which they were not appointed. Ultimately, this leaves no state agency with the responsibility to systematically verify that proper appointments are made.

The Administrative Office of the Courts administers a statewide court information system. In the past, appointments of a guardian ad litem were recorded at a case level, not for individual children. In 2023, the office began switching to a new version of the system. Officials with the Administrative Office of the Courts reported that the new version may have the ability to report whether children have an appointed advocate. Officials were working to reconfigure the data system for this use at the time this follow-up was released.



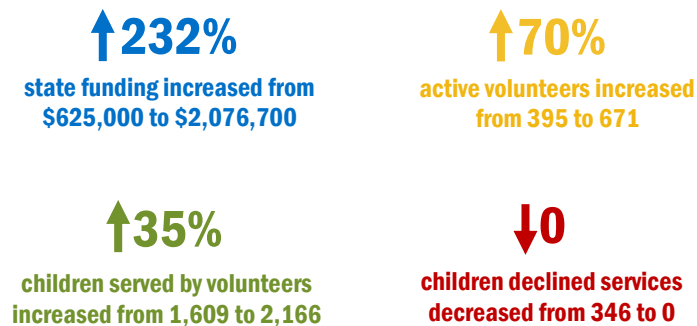
Increased state funding led to more children served and better guardian ad litem program stability.

The Legislature has significantly increased the amount of state funding to the guardian ad litem programs. We found that since 2018 more volunteers were recruited and retained, and more children were served by volunteers. We also found that no children were denied advocacy by a guardian ad litem program in fiscal year 2023. These factors contributed to better stability in the programs overall.

Exhibit 3

Increased funding led to more volunteers, more children served by volunteers, and less children denied services.

Comparisons in key metrics between fiscal years 2017 and 2023.



Source: Office of Performance Evaluations' compilation of data from the guardian ad litem programs.

In 2018, programs struggled with consistency.

In 2018, we found that stability and consistency were the greatest challenges to effective advocacy for guardian ad litem programs. The programs are funded by state dollars, grants, private donations, fundraising, and county contributions. In fiscal year 2017, the state appropriated \$625,000 to the guardian ad litem programs.

In 2018, program staff reported that they had to spend a significant amount of time fundraising which diverted time away from other responsibilities. Funding limitations amplified challenges including

- volunteer recruitment and retention,
- inconsistent standards across programs,
- reliance on staff to serve children instead of focusing on their role of supporting volunteers, and
- inconsistent compliance with the National CASA/ GAL Association for Children standards.

Due to a lack of volunteers, 346 children 11 years and younger were not served by a guardian ad litem program in 2018. Some of these children had no court-appointed advocate at all because the state did not have a way to verify whether children were subsequently appointed an attorney. In our independent review of a sample of children and youth in 2018, 18 percent did not have a guardian ad litem or an attorney.

In 2023, programs were in a better financial position and served all appointed children.

In 2023, the guardian ad litem programs were in a better financial position, primarily because of increased state funding. In fiscal year 2023 the state appropriation had increased to \$2,076,700. The appropriation was \$2,695,300 in fiscal year 2024.

The programs reported using the increased funding to build their capacity to serve children. For example, all programs reported using funding for staff positions that support volunteers. Most programs also reported that volunteer recruitment and retention had improved since 2018.

Programs also reported using the funding to purchase needed supplies, provide training and continuing education, and move to office spaces that better suited their needs. One program reported that increased funding decreased its reliance on resource-intensive fundraisers.


With enhanced staffing and resources, the guardian ad litem programs served every child that was appointed to their programs in 2023. All seven programs were in compliance with national standards. The programs also significantly improved the number of children who were served by a volunteer advocate as

opposed to a staff member. The use of volunteer advocates better aligns with national standards.

The improved stability in core functions has let the guardian ad litem programs pursue more ambitious goals, such as:

- expand advocacy to all youth 12 years and older
- expand the pool of volunteers to best match the backgrounds and skills of the volunteers to the needs of children
- provide specialized training, such as advocacy for teenagers and trauma-informed advocacy
- improve continuity and case management to ensure that the Department of Health and Welfare and the courts prioritize the best interests of children

With these improvements, the underlying concern in our 2018 consideration was addressed. However, the conditions that led to improvement are dynamic. An entity responsible for statewide coordination and outcomes could ensure that the guardian ad litem programs remain adequately resourced.

	2018 Consideration	Status
	Revisit the statutory definition of guardian ad litem in Idaho Code § 16-1602(23) and consider whether to expand the definition to include program employees in addition to volunteers	Intent is currently met by improvements in volunteer recruitment and retention

The guardian ad litem programs may benefit from more structure and statewide coordination.

In 2018 we found that consistency and stability were the two greatest challenges for the guardian ad litem programs. In 2018, we recommended that the Legislature identify an entity whose role would be clearly defined in statute to support guardians ad litem and appointed attorneys. We further recommended that the entity should provide the following support activities:

- track data for early appointment, training, stability, and other identified performance indicators
- facilitate shared learning by using statewide data to explore known gaps in the system
- provide or sponsor training on child protection topics
- facilitate policy discussions
- distribute money appropriated for guardian ad litem programs
- stabilize nonprofits through leadership and capacity building

In 2024, we found that there was still no such statewide entity. Our 2018 consideration to strengthen the state’s role to that of capacity building was not addressed.



2018 Consideration

Strengthen the state’s role from that of grant administration to capacity building and ensure every child in every case is appointed a guardian ad litem, an attorney, or both as required by statute

Status

Improvements were made in funding but ongoing concerns about gaps and program continuity remained

Why is tracking data for performance indicators important?



A statewide entity could use tracked performance data to investigate how representation is affected when children are placed outside of the judicial district that they reside in. Guardian ad litem programs reported during this follow-up that while they do not withdraw from a case that is placed out of area because the child still needs advocacy, there are risks including reduced in-person visits, diminished connection for the child with their community, inhibited ability to investigate a child's circumstances, and a lack of knowledge of valuable location-specific resources and networking.

One CASA director explained:

“ In our district we are seeing more and more children placed out of the area due to a lack of foster homes... This is a crisis in my opinion.

The National CASA/GAL Association for Children has the infrastructure to guide and support a statewide coordinator. The guardian ad litem programs have tried on three different occasions to get a state association off the ground. The Executive Director of the CASA program in the Fifth Judicial District explained that these attempts were unsuccessful because there was no ongoing financial support.

The state role has been limited to that of grant administrator. The Administrative Office of the Courts ensures that the guardian ad litem programs receive state funding and follow basic requirements set out in statute and rule.¹⁷ The grants are allocated based on the recommendation of the Guardian Ad Litem Review Board, which was established in 2022. The board uses a set of criteria to evaluate the applications for funding and make allocation recommendations.

17. Idaho Code § 16-1639.

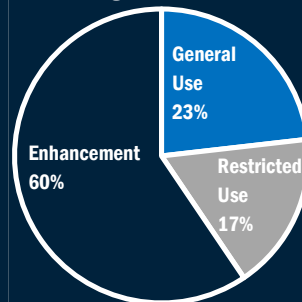
While the Administrative Office of the Courts endeavors to improve accountability in the grant application process, the courts do not take a role in overseeing the quality of implementation. Court officials reported that the programs may benefit from more structure and coordination at a statewide level. Consistency in practice and access to legal services were listed as areas for improvement.

Access to attorneys for guardians ad litem was echoed as a concern across the programs. The programs that use pro bono attorneys incur costs to recruit and train those attorneys. Programs that use county-funded attorneys reported concerns about the impact that the new statewide public defense system will have on their program resources (see page 18 for more on the new system).

How is state funding allocated to guardian ad litem programs?

State funding for the guardian ad litem programs is paid in three separate allocations. The first is for general use, which was \$625,000 in fiscal year 2024. The second is a restricted use allocation for volunteer recruitment, training, and retention which was \$467,500 in fiscal year 2024. Both the general use and restricted use allocations are distributed through a grant award. Finally, the programs received \$1,602,800 in enhancement funds allocated to the programs that made direct requests to the Legislature without limitation or comment by the Administrative Office of the Courts.

FY 2024 State Funding Allocations for Guardian Ad Litem Programs



Statutory ambiguity threatens to worsen advocacy for children.


Ambiguity in the statutory requirements for which government entity is required to provide appointed attorneys for children and guardians ad litem threatens to decrease the consistency of advocacy in child protection cases. Through October 2024, counties will continue to provide appointed attorneys to youth 12 years and older and children when appropriate through their public defense funds.


Effective July of 2024, the Legislature created the Office of the State Public Defender. The office will replace the Idaho Public Defense Commission and assume the responsibility for most public defense services from Idaho's counties. As of the release of this follow-up report, the office did not plan to assume responsibility for child protection cases. In a written response to a review of this report, the State Public Defender stated:

“ The Office of the State Public Defender was created to address inadequacies in criminal defense in Idaho. It was a response to the ACLU's litigation in the Tucker case which only addressed the right to counsel in criminal matters. The State Public Defender Act makes no provision for cases not falling within the purview of I.C.-6005. The legislation itself only refers to Idaho's obligation to provide indigent public defense pursuant to the Sixth Amendment to the United States constitution and Section 13, Article 10 of the Constitution of the State of Idaho. See I.C. 19-6005. The State Public Defender Act makes no provision for cases not falling under the Sixth Amendment right to counsel. The legislation itself only refers to Idaho's obligation to provide indigent public defense pursuant to the Sixth Amendment to the United States constitution and Section 13, Article 10 of the Constitution of the State of Idaho. See I.C. 19-6005.

In 2018, attorneys reported challenges when serving children including difficulty spending sufficient time with their clients outside of the courtroom and a lack of statewide coordination. We also found that there were no specific child protection training requirements for attorneys.

We presented policy considerations to the Legislature to expand support and require training for attorneys assigned to child protection cases. We found during this follow-up that our considerations were not addressed.

 2018 Consideration	Status
Explore opportunities to expand support services to attorneys appointed to child protection cases	Not addressed

 2018 Consideration	Status
Enhance training requirements for appointed attorneys	Not addressed

The transition to the Office of the State Public Defender may exacerbate the unresolved issues we found in 2018 by creating additional ambiguities. The commission had rules that set caseload standards for child protection cases. The commission also required that attorneys had “the ability, training, experience, and understanding necessary for their appointed cases.”¹⁸ It is unclear what entity would set caseload and training standards if child protection is not within the scope of the Office of the State Public Defender.

18. Idaho Administrative Code 61.01.02.060.03.

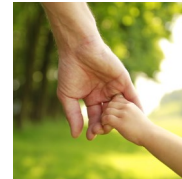
19. National Association of Counsel for Children, *Claiming IV-E Funds for Attorneys for Children and Parents*, (2022) https://naccchildlaw.org/wp-content/uploads/2023/03/iv-e_two_pager.pdf.

The lack of statewide, coordinated legal services in abuse and neglect cases has been a barrier to pursuing available federal funds. Idaho is one of only three states that have not claimed federal funds meant to reduce the state’s cost of attorneys and support staff providing legal representation to children and parents.¹⁹

To address these concerns, the Legislature could consider assigning the oversight of legal services in abuse and neglect cases to a specific entity. Options include:

1. Clarifying whether child protection cases should be included in the responsibilities of the Office of the State Public Defender and exploring if further resources are needed by the office to fulfill these responsibilities.
2. Prescribing that, if the Office of the State Public Defender does not assume responsibility for child protection cases, it should be responsible for managing federal funding that counties could access for appointed attorneys to children, youth, and parents in abuse and neglect cases.
3. Considering alternative placement for legal services in abuse and neglect cases.

What are potential alternative placements for legal services in abuse and neglect cases?



Some states have a child’s advocate office or a child ombuds office that coordinates the guardian ad litem programs.²⁰ For example, the Delaware Office of the Child Advocate has responsibilities to promote system reform as well as provide legal representation for children including the Court Appointed Special Advocate Program.²¹

20. 2022 Annual Report, State of Rhode Island Office of the Child Advocate at 3, <http://www.child-advocate.ri.gov/documents/reports/Annual%20Report%202022.pdf>. The Office has several statutory authorities including “Provide training and technical assistance to guardian ad litem and special advocates appointed by the Family Court to represent children in proceedings before that court.”

21. Del. Code Ann. 29 §§ 9001A–9A

In 2017, we described child protection as a system with “exceptionally difficult problems.” That continues to be true. Robust case-level advocacy provides an immediate safeguard for children. The goal is to keep the best interests of children at the forefront of every decision. Our review of best practices in 2018 revealed that children who have strong advocacy and legal representation had the following positive outcomes:

- spent less time in foster care
- had fewer placement changes
- received more services
- had more positive permanent placement decisions like reunifications with family or adoptions

We reiterate our 2018 recommendation for a clearly-defined state entity to be responsible for ensuring every child and youth has quality advocacy in abuse and neglect cases.

