

OJJDP Center for Coordinated
Assistance to States
Multi-System Collaboration Training and
Technical Assistance Program

*Improving Outcomes for Multi-System Youth:
Building Cross-System Capacity and Infrastructure*

Spring 2018
Request for Applications for Cohort VI

Table of Contents

I. Background and Overview.....	1
II. Who Should Apply.....	2
III. About the Training and Technical Assistance Program.....	3
IV. Anticipated Outcomes for Participating Jurisdictions	6
V. MSC-TTA Program Expectations.....	7
VI. Application Process and Selection Criteria.....	8
VII. Application Guidelines	9
VIII. About the Center for Coordinated Assistance to States	11
IX. Application Checklist and Key Dates	12
X. References.....	12

I. Background and Overview

Youth involved with multiple systems of care (e.g., child welfare, education, behavioral health, and juvenile justice) are a high needs population. Typically, these youth have histories of maltreatment and trauma; experience significant educational challenges; are more likely to face disparate treatment on the basis of race, gender, and sexual identity; have high levels of exposure to community and family violence; and suffer from untreated mental health needs and substance use issues (Herz, Lee, Lutz, Stewart, Tuell, & Wiig, 2012). Given these considerations, systems and organizations must work together in a collaborative manner to realize improved outcomes.

One of the greatest challenges in serving at-risk youth is determining how to effectively coordinate the multiple systems serving them. Often, these systems lack the formal relationships and structural alignment that contribute to positive outcomes for this population (Herz, Ryan, & Bilchik, 2010). The absence of a formalized infrastructure to collaborate across systems can result in a lack of coordinated case management, fiscal inefficiencies, conflicting communication with youth and families, and youth becoming further entrenched in each system. While many jurisdictions acknowledge the benefits of improving coordination and cooperation across systems, changing ingrained practices, policies, and behaviors presents a myriad of challenges. Human service, justice, and other agencies often lack a relevant and necessary understanding of each other's functions and organizational relationships that support integration and collaboration.

Jurisdictions that have the infrastructure in place to support system improvement efforts and multi-system collaboration are in a better position to enhance outcomes for youth, families, staff, and communities. Broadly defined, this infrastructure is composed of three essential elements:

1. An appropriate and engaged leadership team to oversee multi-system efforts;
2. An environment in which each system has thorough knowledge of its partner systems within the community, including clear understanding of the legal, structural, financial, and cultural constraints that inform each system's actions; and
3. A robust information and data-sharing infrastructure to enhance both case-level decision making and population-level policy decisions.

In order to help jurisdictions develop or improve these essential elements of their multi-system collaboration infrastructure, the Center for Coordinated Assistance to States (CCAS), through funding from the U.S. Department of Justice, Office of Justice Programs, Office of Juvenile Justice and Delinquency Prevention, is offering communities an opportunity to apply for the Multi-System Collaboration Training and Technical Assistance (MSC-TTA) program. This program, offered at **no cost** to participants, assists multi-disciplinary teams in developing a stronger infrastructure to improve system processes and outcomes for multi-system youth in topical areas of a team's choosing.

States, tribes, territories, local governments, and community agencies and organizations participating in this program benefit from having:

- Training and technical support to assist in their efforts related to multi-system collaboration, including both on-site and distance learning opportunities;
- A better understanding of the multi-system operations within their jurisdiction;
- Support and clear direction to produce a multi-system strategic plan designed to mitigate and/or improve identified issues in cross-system collaboration;
- A connection to resources and content experts to assist in mobilizing their efforts; and
- Learning opportunities with other jurisdictions undertaking multi-system improvement efforts.

By the end of the program, participating teams will have increased their knowledge about the inter-workings of their youth-serving systems; acquired a variety of tools to improve approaches and services for youth involved in multiple systems of care; and enhanced collaboration and teamwork among key system partners. The final product of the program will be a focused action plan that the teams develop to guide the implementation of the policies, practices, and principles discussed within the MSC-TTA. These action plans will be unique to each jurisdiction's individual needs, strengths, and goals for multi-system reform.

II. Who Should Apply

Teams representing states, tribes, territories, local governments, and/or community agencies and organizations that wish to improve outcomes for youth, families, staff, and communities; seek to enhance multi-system processes; and are committed to cross-system collaboration are encouraged to apply. This training and technical assistance (TTA) program will help jurisdictions develop or enhance their formal infrastructure for cross-system collaboration in topical areas of their choosing. Participating jurisdictions will apply the TTA to a specific initiative, project, or goal of importance to them. Therefore, the MSC-TTA program benefits jurisdictions that:

- Demonstrate a commitment to implementing cross-system reforms and operational improvements (i.e., formal collaboration between juvenile justice, child welfare, the courts, school systems, behavioral health, and other partners in serving multi-system youth);
- Seek to achieve substantial improvement in case- and system-level collaboration;
- Expect to undertake significant efforts focused on system integration or the merger/splitting of two or more agencies; and/or
- Are interested in reinvigorating previous system improvement efforts and/or updating multi-system collaboration protocols devised under previous efforts.

Participating in the MSC-TTA requires a commitment of leadership to support the system change that will bring multi-system collaboration to fruition. Having leadership from all applicable systems, which may include the family court, child welfare, juvenile justice, law enforcement, behavioral health, and education, is paramount to addressing the unique

needs of youth involved in multiple systems. Teams that have committed leadership from key human and public service organizations and other community partners will be in the

Examples of jurisdictions previously involved in MSC -TTA and their focus areas:

- **Arlington Co., VA** – Developing a shared model for engaging youth and families through the creation of a unified system of care.
- **Honolulu, HI** – Enhancing a multi-system response to the commercial sexual exploitation of children.
- **Lancaster Co., NE** – Developing a coordinated crisis response program for children and youth.
- **Marathon Co., WI** – Creating a multi-system diversion program that focuses on youth engagement in pro-social activities.
- **Richmond, VA** - Developing a collaborative case management structure to support chronically truant youth and families in poverty.
- **State of Florida** – Developing a multi-system response to justice-involved youth living in the community awaiting a competence-to-stand-trial determination.
- **State of Minnesota** – Improving the consistency and effectiveness of county-level transition services for young people exiting community-based programs and facilities.
- **Wayne Co., OH** – Refinement of the intersystem Levels of Care assessment process to improve how services are provided to youth.

best position to benefit from the training and technical assistance provided through the MSC-TTA.

III. About the Training and Technical Assistance Program

The administration of the Multi-System Collaboration Training and Technical Assistance program will be led primarily by the Georgetown University McCourt School of Public Policy's Center for Juvenile Justice Reform (CJJR) in conjunction with its CCAS partners. CJJR has an extensive history of working with hundreds of jurisdictions across the country to implement multi-system change through the Crossover Youth Practice Model (CYPM), Youth in Custody Practice Model (YICPM), and Certificate Programs.

The MSC-TTA utilizes a cohort approach to TTA in which participating teams engage in the program alongside other jurisdictions from across the county. This interactive approach allows participants to learn from and provide guidance to peers engaged in a similar body of work around multi-system youth. A cohort of up to four sites will be selected to participate in learning sessions that are informative, instructional, and interactive. During this seven-month period of engagement, the MSC-TTA Training Team engages participants in a series of training and technical assistance distance-learning sessions with content pertaining to:

- Assessing leadership strengths and opportunities for improvement;

- Understanding the system change process and how each step applies to the jurisdiction's goals for improvement;
- Developing greater trust, knowledge, and awareness of systems within the collaborative;
- Achieving a greater understanding of the policies and practices of each partner organization;
- Strengthening data and case-level information sharing between partner agencies;
- Formulating logic models to demonstrate how the planned system change will directly impact youth and system outcomes;
- Implementing strengths-based approaches to partnering and empowering youth and families in the system change process;
- Enhancing the coordination of operations between agencies; and
- Laying the groundwork for both short- and long-term improvement efforts.

Participating jurisdictions must identify a topic related to at-risk or multi-system youth that will be the subject of a focused action plan. The ideal topic will involve a specific population at-risk of involvement or involved in multiple systems; have measurable outcomes that can be tracked over time; and have multi-system solutions such as policy changes, improved cross-systems infrastructure, funding agreements, or other codified multi-agency agreements. Examples of topics include, but are not limited to:

- Youth dually involved in the child welfare and juvenile justice systems;
- State-level collaborative undertakings targeting multi-system youth (e.g., "Children's Cabinets");
- Out-of-home placement mobility and school/housing instability;
- School-based diversion programs;
- Involvement of youth with behavioral health issues in juvenile justice and/or child welfare systems;
- Community reentry for incarcerated youth; and
- Early identification of trauma and/or behavioral health issues.

Applicants may select a topic from the above list or develop their own topic that is relevant to their jurisdiction. Over the course of the MSC-TTA program, sites will develop their action plan to address their topic of choice.

To assist in the development of a jurisdiction's action plan, the MSC-TTA will provide a series of technical assistance activities on a variety of topics designed to support a robust multi-system collaborative infrastructure. Sites will be expected to incorporate goals associated with these TTA topics into their action plans. TTA will be provided through training sessions that consist of webinars, conference calls, individualized assistance as needed, and one day of on-site TTA. The distance TTA sessions will include a mix of individualized jurisdiction-specific and all-sites interactive activities, and the on-site training session will be designed to further advance the team's project goals. All programming will aid jurisdictions with incorporating research and best practices into their multi-system collaboration efforts.

MSC-TTA topics will include:

1. **Understanding Youth Systems through Mapping and Gap Analysis** – This session will provide an overview of how to conduct a mapping of current systems and use this information to better understand how a jurisdiction serves youth and families. In addition, participating teams will complete a gap analysis to assess their strengths around four key components of multi-system collaboration: system connectedness, data and information sharing, quality assurance, and workforce training. This session will allow sites to explore the ways in which their own systems function and how they can adapt protocols for stronger collaboration into the pre-existing structure of each agency.
2. **Essential Steps for Information Sharing across Agencies** – This session will teach jurisdictions the essential steps for developing a robust information sharing infrastructure among child- and family-serving agencies. Participants will better understand how federal laws and state statutes support the sharing of information in a cautious and inclusionary manner. The session will highlight the types of information partners can and should be sharing to serve youth in multiple systems in an efficient and effective way.
3. **Utilizing Data to Inform Cross-System Collaboration** – This session will address how sites can utilize their data to better understand trends in the population of youth being served by multiple agencies and identify areas in need of reform. This session will also discuss strategies for designing and carrying out evaluations of new reforms, policies, and system change efforts. To do this, participating jurisdictions will develop logic models that reflect a direct connection from the reform efforts to population and system indicators. In addition, this session will include discussions about obtaining data, establishing a manageable and affordable data platform, and presenting/communicating data in a way that is engaging and informative.
4. **Empowering and Strengthening Relationships with Youth and Families** – This session will focus on the critical need to have families and young people involved at the core of a strength-based case practice model and engaged in the system change effort. This session will explore the benefits of and barriers to effective partnerships with youth and families in system change efforts. Jurisdictions will learn a practical framework for empowering youth and families and review examples of successful partnerships in jurisdictions across the county.
5. **Implementing and Sustaining System Change** – This session will introduce a framework for implementing significant and powerful system change designed to improve outcomes for multi-system youth. Teams will consider different ways of implementing system change in their community by reviewing both the academic literature on the subject and real-world examples of communities that have made lasting reforms within their child-serving systems. This session will also explore the necessary elements needed both in leadership and within the workforce of an organization to ensure sustainability of change efforts. By the end of this session, teams will develop a detailed action plan for short- and long-term system improvement efforts that align with each team’s stated goals.

IV. Anticipated Outcomes for Participating Jurisdictions

The MSC-TTA offers a developmental process that requires the selected sites to engage in a series of interactive activities (as outlined in Section III). These activities focus on identifying existing barriers to partnership development and information sharing, understanding how youth are served in various contexts, acknowledging how agency culture impacts change, challenging the role of leadership and empowering others in the change process, and identifying ways to truly partner with and empower youth and families.

This process is designed to foster trust, understanding, and collaboration among involved systems. In addition, jurisdictions will develop concrete tools throughout the MSC-TTA to enhance the system change process and improve outcomes for multi-system youth. Specifically, MSC-TTA sites will develop:

1. A **Project Charter**, approved by each participating entity, which outlines the scope, deliverables, expectations, and other key elements of the multi-system initiative that a jurisdiction is addressing through the MSC-TTA.
2. A series of **System Maps** that outline the structure of different agencies and the movement of youth through and across various systems. These maps will assist jurisdictions in identifying points of intersection and developing specific protocols for treating youth in a cross-systems manner.
3. A **Gap Analysis** to identify areas of strength and areas in need of improvement in multi-system collaboration. The Gap Analysis will help jurisdictions target specific areas of reform in their Action Plans.
4. A **Logic Model** to illustrate the direct link between the reform efforts and the anticipated population and system outcomes;
5. A focused **Action Plan** that will provide jurisdictions with a step-by-step plan for implementing their specific system change goals. As the final product of the MSC-TTA, the Action Plan will build upon the practices, principles, and protocols discussed within the program. This document will include short- and long-term process and outcome measures to understand the impact of the proposed reform effort.

In addition to these specific tools, program participants may choose to use their access to resources, content experts, and a learning community of other jurisdictions to develop additional materials related to improving multi-system collaboration in their individual communities. Examples of materials jurisdictions may develop throughout the MSC-TTA include, but are not limited to:

- A uniform consent form for sharing client information across systems;
- A plan for conducting focus groups and other outreach efforts to better solicit the feedback and opinions of system-involved youth and their families;
- Brochures, flyers, and other promotional materials to engage community partners, youth, and families in their multi-system efforts; and
- An inventory of services, resources, or other local activities related to the treatment of multi-system youth.

What Should Participants Expect from the MSC-TTA Program?

By actively engaging in the formal technical assistance process and utilizing the various tools developed throughout the program, jurisdictions will make important improvements to their infrastructure for serving multi-system youth. By the end of this program, sites will:

- Have established an appropriate and engaged leadership team that will oversee future reforms;
- Have greater communication, trust, and understanding with their partner systems;
- Have had ongoing access to the MSC Training Team and other content experts and leaders in the field of juvenile justice to inform their efforts;
- Have received valuable training and technical assistance, including distance learning webinars and phone calls, and a day-long on-site training session facilitated by the MSC Training Team that supports the refinement, planning, and/or implementation of the proposed project;
- Have greater familiarity with tools to strengthen youth and family partnerships at the policy and practice level;
- Have completed the preparatory work in support of a fully operational and robust local information-sharing infrastructure (e.g., collecting existing information sharing agreements and commonly used consent forms, reviewing local and state laws, and identifying key participants for an information sharing workgroup);
- Have developed a strategic action plan to guide the implementation of their reform efforts;
- Have designed an evaluation strategy including defining outcome measures to track the impact of the multi-system efforts; and
- Have developed relationships with partners from other participating sites in a learning community environment that supports ongoing field building.

V. MSC-TTA Program Expectations

The program mandates that sites be actively engaged in the TTA process, including the completion of various pre-work and follow-up assignments, through a schedule of:

- Collaborative topical webinars to explore and discuss multi-system issues and topics detailed in Section III;
- Facilitated conference calls that provide an opportunity for sites to discuss their successes, challenges, and barriers;
- A one-day on-site training session designed to advance the site's project goals; and
- Individualized TTA to address site-specific challenges.

The TTA will follow an approximate schedule of one webinar and one conference call each month. Participating teams will receive a copy of the program's schedule upon acceptance to the MSC-TTA. Attendance at scheduled TTA activities is expected and an important component of successful participation in the MSC-TTA.

The MSC-TTA Training Team will also conduct one on-site visit to each participating jurisdiction. The jurisdiction and the Training Team will jointly plan the goals, timing, and location of that site visit, and the jurisdiction with help to arrange meeting logistics (e.g., securing meeting space, printing materials). The purpose of the facilitated visit is to assist the jurisdiction in supporting their project goals and garnering local support as needed.

Each jurisdiction will develop a multi-disciplinary team with representation from each of the youth-serving systems that are key to the jurisdiction's multi-system collaboration goals. Sites are expected to participate in individual team meetings outside of the TTA events in order to develop their projects and focused action plans. While full participation from the entire team may not always be possible at each TTA event and team meeting, some level of representation from each participating system is required.

Finally, it is expected that participating teams will thoughtfully engage with the other teams involved in their cohort. This engagement may occur during the webinars and conference calls, over the program's web-based communications platform, or outside the program's structured TTA if desired. This level of engagement will enhance a key benefit of the MSC-TTA program design: the knowledge and experience of participating teams. Teams should come to each TTA session prepared to share their experiences on different multi-system issues and provide guidance and advice to their peers. This peer-to-peer engagement, coupled with the information provided by the MSC-TTA Training Team, will support the formation of a multi-dimensional learning community dedicated to addressing the challenges in serving a high-needs population.

VI. Application Process and Selection Criteria

1. Informational Webinars

CJJR will host two, one-hour informational webinars about the MSC-TTA for those sites interested in applying. The content of these webinars will be the same on both dates. These webinars will be held on:

- Tuesday, February 20 at 11:30 am – 12:30 pm ET. Register at:
<https://attendee.gotowebinar.com/register/5420771933615943426>

- Tuesday, February 27, at 3:00 pm – 4:00 pm ET. Register at:
<https://attendee.gotowebinar.com/register/871897715948530434>

Applicants are encouraged but not required to attend one of these webinars.

2. Application Submission

Interested jurisdictions must submit an application **no later than 11:59 pm (in the applicant's time zone) on Friday, March 16, 2018 at:**

<http://cjr.georgetown.edu/mscttaapplication>

A panel consisting of CCAS organizations and MSC-TTA consultants will review the applications. The criteria for selecting jurisdictions include:

- A demonstrated commitment by the site to addressing issues through multi-system collaboration, including any past collaborative efforts;
- Evidence of the commitment of leadership from the site's family court; juvenile justice and child welfare agencies; and other key system leaders needed to oversee the project being proposed by the applicant (the strongest applications will include, as appropriate, evidence of participation by many, if not all, of the stakeholder groups listed in Section VII – Question 4 as required based on the proposed project); and
- Clarity and completeness of responses to the application questions.

3. Notice of Acceptance

Up to four sites will be selected to participate in the MSC-TTA program. Notices of acceptance will be sent via email to the identified parties on the application by 5 pm ET on April 2, 2018. All selected sites must be willing to complete the assigned pre-work by April 11, 2018 and available to participate in the first webinar scheduled for April 12, 2018 from 2:00 pm - 4:00 pm ET.

VII. Application Guidelines

Applications are to be submitted by 11:59 pm (in applicant's local time zone) on Friday, March 16, 2018. The application document must be downloaded and submitted online at:

<http://cjr.georgetown.edu/mscttaapplication/>

Applicants must provide the required information and answer the application questions in the provided document available at the above web address. Please adhere to the following guidelines while completing this application document:

- Be sure to write your response to each section in the provided space in the application document.
- Do not submit an application in excess of eight printed pages, single-spaced, and size 12 point font. Include a cover page noting the jurisdiction's name and application's point-of-contact. The cover page does not count toward the eight-page limit.
- Include page numbers in your application document.
- It is recommended that the electronic document be in PDF form, but Microsoft Word documents are also accepted.

When responding to the following application questions, applicants must ensure that the responses reflect a multi-system perspective. Each question will be scored individually and

contribute to an overall application score, therefore it is important that each question is answered completely. Members of the CCAS organization and MSC-TTA consultants will consider the overall application score when selecting the jurisdictions to participate in the MSC-TTA program.

Application Questions:

1. Provide a listing and brief description of the agencies and/or organizations applying for participation in the MSC-TTA.
2. Indicate why the site is interested in participating in this program by describing the multi-system project or goal on which it wishes to receive TTA. Explain why the site considers this issue to be important, what it hopes to achieve, and note any special challenges previously faced in addressing the identified issue.
3. Briefly describe the specific site that will be the target of the multi-system work (e.g., state, tribe, county, city, community). Please include information such as relevant demographic information and noteworthy context for the multi-system issue the team wishes to address through the MSC-TTA (e.g., historical initiatives, relevant changes in statutes, the goals and priorities of the jurisdiction's leadership).
4. Indicate which of the following stakeholder groups in the site will participate in this collaboration not listed in Question 1:
 - Behavioral Health (Mental Health and Substance Abuse)
 - Child Welfare
 - Community Providers and Advocates (e.g., Youth and Family Advocates)
 - Court Appointed Special Advocates (CASAs)
 - Education
 - Family Court
 - Guardians Ad Litem
 - Juvenile Justice
 - Law Enforcement
 - Attorneys (Dependency and Delinquency)
 - Other (Please describe)
5. Briefly describe the entities identified in Question 4, including type of organization, size, client population, county/state/tribal administered. For example, the juvenile justice system may be state-administered and the child welfare system may be county-administered. If there are multiple law enforcement and education entities describe the one that predominantly serves the targeted area. This response should only include those agencies and organizations not listed in Question 1.
6. Describe any child-, youth- and family-focused multi-system collaboration in which the site has engaged and the outcomes achieved as a result. Include any TA that the

site is presently receiving, or due to receive, related to the multi-system issue you want to address.

7. Describe the site's ability to gather and analyze data from multiple agencies, including the use of any existing multi-system databases.
8. Describe the site's strengths with respect to collaboration and identify particular areas on which the site would like to improve.
9. Please provide additional information not covered above regarding your site that is relevant to the review of your application as a participant in the MSC-TTA.

Additional Information to Submit with the Application

Provide the following information (this information is excluded from the page limit):

- Names, titles, organizations (using full names, rather than acronyms), telephone numbers, and email addresses of the primary authors of the application;
- Names and email addresses of the core system agency partners that will be leading the project; and
- Name, title, email address, and phone number for the primary point of contact during the application process.

VIII. About the Center for Coordinated Assistance to States

Through funding from the U.S. Department of Justice, Office of Justice Programs, Office of Juvenile Justice and Delinquency Prevention, the American Institutes for Research (AIR), Georgetown University McCourt School of Public Policy's Center for Juvenile Justice Reform (CJJR), and the Council of Juvenile Correctional Administrators (CJCA) operate the Center for Coordinated Assistance to States (CCAS). While CCAS provides a variety of TTA supports to jurisdictions across the country (as enumerated below), in this instance CCAS coordinates the delivery of TTA to states, tribes, territories, local governments, and community agencies and organizations looking to improve outcomes for at-risk youth and youth involved in juvenile justice, child welfare, and related systems of care.

The broader range of TTA areas on which CCAS focuses includes:

- Delinquency prevention, intervention, and system improvement;
- Maximizing state advisory group impact;
- Evidence-based approaches in detention and commitment;
- Information sharing, dually-involved youth, and systems improvement; and
- Emergency preparedness.

CCAS provides TTA using a variety of mechanisms, such as coaching, on-site training, toolkits, issue briefs, webinars, mentoring, establishing communities of practices, and brokering resources.

For more information on CCAS and its partnering organizations, please visit the following websites:

- CCAS: <http://www.ojdpccas.org>
- AIR: <http://www.air.org>
- CJJR: <http://cjjr.georgetown.edu>
- CJCA: <http://cjca.net>

IX. Application Checklist and Key Dates

- Participate in one of the two informational webinars on:
 - Tuesday, February 20, 2018 at 11:30 am – 12:30 pm ET; Register at: <https://attendee.gotowebinar.com/register/5420771933615943426>
 - Tuesday, February 27, 2018 at 3:00 pm – 4:00 pm ET; Register at: <https://attendee.gotowebinar.com/register/871897715948530434>
- Assemble a multi-disciplinary team to complete the MSC-TTA application
- Submit completed application by Friday, March 16, 2018 at
 - <http://cjjr.georgetown.edu/mscttaapplication/>
- Receive notice of selection decision by 5:00 pm ET on April 2, 2018;
- Submit pre-work assignments by 5:00 pm ET on April 11, 2018;
- Participate in the initial webinar for selected jurisdictions on April 12, 2018 from 2:00 pm - 4:00 pm ET

All inquiries regarding the MSC-TTA should be directed to Sam Abbott via email at samuel.abbott@georgetown.edu or via phone at 202-687-7765 or Macon Stewart via email at macon.stewart@georgetown.edu.

To learn more about the Center for Juvenile Justice Reform's role in the Center for Coordinated Assistance to States, please visit our website at <http://cjjr.georgetown.edu/our-work/center-for-coordinated-assistance-to-states/>

X. References

Herz, D., Lee, P., Lutz, L., Stewart, M., Tuell, J., & Wiig, J. (2012). Addressing the needs of multi-system youth: Strengthening the connection between child welfare and juvenile justice. Georgetown University, McCourt School of Public Policy: Center for Juvenile Justice Reform. Available at: <http://cjjr.georgetown.edu/resources/publications/>

Herz, D. C., Ryan, J. P., & Bilchik, S. (2010). Challenges Facing Crossover Youth: An Examination of Juvenile-Justice Decision Making and Recidivism. *Family Court Review*, 48(2), 305-321.