A Call To Action Regarding The BIA Guidelines

Friday, March 27, 2015 1:00 p.m. EST

Introduction

Shortly after passage of the ICWA, the Department of the Interior issued the Bureau of Indian Affairs Guidelines for State Courts: Indian Child Custody Proceedings (hereinafter "Guidelines"). The Guidelines specifically state that they are not regulations, but merely guidelines to provide information and guidance for state court cases involving Indian children and the ICWA. Over the past thirty plus years the majority of state appellate courts have often cited the Guidelines in their opinions addressing the ICWA. The appellate courts have always stated the Guidelines are not binding or mandatory.



Laurie Goldheim, AAAA President





Academy's Actions To Date

The Academy first learned that the Department of Interior was considering the possibility of revising the BIA Guidelines by way of correspondence, dated February 21, 2014, addressed to tribal leaders from Kevin Washburn, Assistant Secretary-Indian Affairs. In his letter, at paragraph 2, he states that,

"In response to the recent critical issues regarding ICWA, I have directed my staff to re-examine the *Guidelines* and respectfully request your input..."

The Committee contacted the BIA and learned that Mr. Washburn's letter to tribal leaders was **not** sent to adoption agencies, adoption attorneys, nor child welfare agencies. The Academy requested they be allowed to comment and was advised that was acceptable. The Academy submitted comments on April 24, 2014 wherein we principally addressed the *Guidelines* were <u>not</u> regulations, and questioned creating federal regulations that would be binding upon state courts.

Shortly thereafter, we were advised that the BIA did intend to go forward in their reexamination of the *Guidelines* and were giving serious consideration to the *Guidelines* becoming federal regulations.

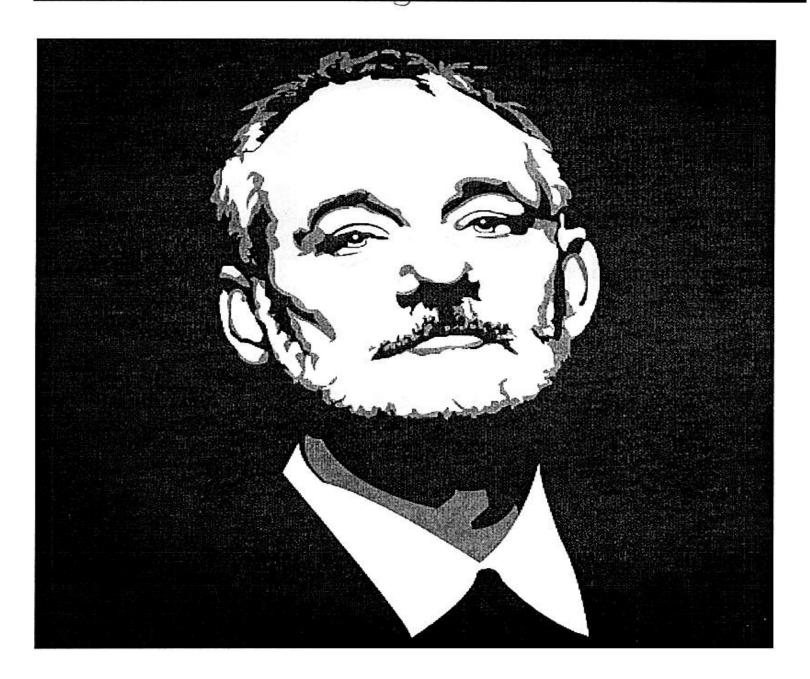




Actions Continued

Since the Fall of 2014, the ICWA Committee, on a frequent basis, has contacted the Bureau of Indian Affairs (BIA) regarding the status of the proposed revisions to the *Guidelines*. Throughout this time period, the BIA advised the Academy that any proposed revisions would be published and available for comment. However, despite their continued reassurances, on February 24, 2015, Jay McCarthy, co-chair of the ICWA Committee, contacted the BIA and was advised that the Undersecretary, Kevin Washburn, would be announcing that the BIA revisions of the Guidelines would be effective immediately and no comment period was allowed. Needless to say, despite reassurances, the Academy and many others have not had an opportunity to provide input, despite the introduction and preamble that alleges that many groups have been allowed ample opportunity to provide comments.





1979 BIA Guidelines (Select Excerpts)

The federal Indian Child Welfare Act was enacted in November 1978. The *Guidelines* were first published in the Federal Register on November 26, 1979, 44 FR, 67584-67595. It is important to note that the 1979 BIA *Guidelines* were written shortly after the enactment of the ICWA and involved many individuals and organizations that were involved in the drafting and passage of the ICWA. The 1979 *Guidelines* state:

"Although the rulemaking procedures of the Administration Procedures Act have been followed in developing these guidelines, they are not published as regulations because they are not intended to have binding legislative effect. Many of these guidelines represent the interpretation of the Interior Department of certain provisions of the Act. Other guidelines provide procedures which, if followed, will help assure that rights guaranteed by the Act are protected when state courts decide Indian child custody matters. To the extent that the Department's interpretations of the Act are correct, contrary interpretations by the courts would be violations of the Act." Guidelines at pg. 67584 (Emphasis added).



1979 BIA Guidelines Continued

"Where Congress expressly delegates to the Secretary the primary responsibility for interpreting a statutory term, regulations interpreting that term have legislative effect. Courts are not free to set aside those regulations simply because they would have interpreted that statute in a different manner. Where, however, primary responsibility for interpreting a statutory term rests with the courts, administrative interpretations of statutory terms are given important but not controlling significance. *Batterton v. Francis*, 432 U.S. 416, 424-425 (1977)." *Guidelines* at pg. 67584

"When, however, the Department writes rules or guidelines advising some other agency how it should carry out responsibilities explicitly assigned to it by Congress, those rules or guidelines are not, by themselves, binding. Courts will take what this Department has to say into account in such instances, but they are free to act contrary to what the Department has said if they are convinced that the Department's guidelines are not required by the statute itself." *Guidelines* at pg. 67584



1979 BIA Guidelines Continued

"Primary responsibility for interpreting other language used in the Act, however, rests with the courts that decide Indian child custody cases. For example, the legislative history of the Act states explicitly that use of the term "good cause" was designed to provide state courts with flexibility in determining the disposition of a placement proceeding involving an Indian child." S. Rep. No. 95-597, 95th Cong., 1st Sess. 17 (1977). *Guidelines* at pg. 67584 (Emphasis added).

"Some commenters asserted that congressional delegation to this Department of authority to promulgate regulations with binding legislative effect with respect to all provisions of the Act is found at 25 U.S.C. 1952, which states, "Within one hundred and eighty days after November 8, 1978, the Secretary shall promulgate such rules and regulations as may be necessary to carry out the provisions of this chapter."

Promulgation of regulations with legislative effect with respect to most of the responsibilities of state or tribal courts under the Act, however, is not necessary to carry out the Act. State and tribal courts are fully capable of carrying out the responsibilities imposed on them by Congress without being under the direct supervision of this Department." *Guidelines* at pg. 67584





1979 BIA Guidelines Continued

"Nothing in the legislative history indicates that Congress intended this department to exercise supervisory control over state or tribal courts or to legislate for them with respect to Indian child custody matters. For Congress to assign to an administrative agency such supervisory control over courts would be an extraordinary step."

"Nothing in the language or legislative history of 25 U.S.C. 1952 compels the conclusion that Congress intended to vest this Department with such extraordinary power." *Guidelines* at pg. 67584 (Emphasis added).

"Assignment of supervisory authority over the courts to an administrative agency is a measure so at odds with concepts of both federalism and separation of powers that it should not be imputed to Congress in the absence of an express declaration of congressional intent to that effect." *Guidelines* at pg. 67584 (Emphasis added).

"Some commenters also recommended that the guidelines be published as regulations and that the decision of whether the law permits such regulations to be binding be left to the court. That approach has not been adopted because the Department has an obligation not to assert authority that it concludes it does not have." Guidelines at pg. 67584 (Emphasis added).





February 25, 2015, Revised Guidelines

As stated above, effective as of February 25, 2015, the Federal Register printed the revised *Guidelines*, 80 FR 10146-10159. The 2015 *Guidelines* contain an opening summary which includes a statement regarding the background of the BIA *Guidelines* which neglects to cite that the authors of the 1979 *Guidelines*, who were imminently involved in the drafting and passage of the federal ICWA, gave great deference to state courts and believe the Guidelines should not be federal regulations. The 2015 *Guidelines* contain the following statement regarding the revocation of the 1979 *Guidelines*, "IV. Guidance". These *Guidelines* supersede and replace the guidelines published at 44 F.R. 67584 (November 26, 1979). 80 F.R. 10150.



Scope of ICWA Committee's Critical Analysis of 2015 Guidelines

Given the horrific effect the 2015 *Guidelines* will have upon children and families, the Academy's ICWA Committee provides the following critical analysis which includes legal authority for sections which we believe are without legal authority to reverse decades of case law which, in pertinent part, addresses the best interests of Indian children, which is glaringly absent, purposely disregarded and rejected in the 2015 *Guidelines*.

The Following Slides Highlight Two Examples of BIA Guidelines Disregard for the Interests of Children





agency or the court of the obligation to comply with the placement preferences

(d) Departure from the placement preferences may occur only after the court has made a determination that good cause exists to place the Indian child with someone who is not listed in the placement preferences.

- (e) Documentation of each preadoptive, adoptive or foster care placement of an Indian child under State law must be provided to the State for maintenance at the agency. Such documentation must include, at a minimum: the petition or complaint; all substantive orders entered in the proceeding; the complete record of, and basis for, the placement determination; and, if the placement deviates from the placement preferences, a detailed explanation of all efforts to comply with the placement preferences and the court order authorizing departure from the placement preferences.
- F.2. What placement preferences apply in adoptive placements?
- (a) In any adoptive placement of an Indian child under State law, preference must be given in descending order, as listed below, to placement of the child
- (1) A member of the child's extended family:
- (2) Other members of the Indian child's tribe; or
- (3) Other Indian families, including families of unwed individuals.
- (b) The court should, where appropriate, also consider the preference of the Indian child or parent
- F.3. What placement preferences apply in foster care or preadoptive placements?

In any foster care or preadoptive placement of an Indian child:

- (a) The child must be placed in the least restrictive setting that:
- (1) Most approximates a family; (2) Allows his or her special needs to be met; and
- (3) Is in reasonable proximity to his o her home, extended family, and/or
- (b) Preference must be given, in descending order as listed below, to placement of the child with:
- (1) A member of the Indian child's extended family;
- (2) A foster home, licensed, approved or specified by the Indian child's tribe, whether on or off the reservation;
- (3) An Indian foster home licensed or approved by an authorized non-Indian licensing authority; or
- (4) An institution for children approved by an Indian tribe or operated by an Indian organization which has a

program suitable to meet the child's

- F.4. How is a determination for "good cause" to depart from the placement preferences made?
- (a) If any party asserts that good cause not to follow the placement preferences exists, the reasons for such belief or assertion must be stated on the record or in writing and made available to the parties to the proceeding and the Indian child's tribe.
- (b) The party seeking departure from the preferences bears the burden of proving by clear and convincing evidence the existence of "good cause" to deviate from the placement preferences.
- (c) A determination of good cause to depart from the placement preferences must be based on one or more of the following considerations:
- (1) The request of the parents, if both parents attest that they have reviewed the placement options that comply with the order of preference.
- (2) The request of the child, if the child is able to understand and comprehend the decision that is being
- (3) The extraordinary physical or emotional needs of the child, such as specialized treatment services that may be unavailable in the community where families who meet the criteria live, as established by testimony of a qualified expert witness; provided that extraordinary physical or emotional needs of the child does not include ordinary bonding or attachment that may have occurred as a result of a placement or the fact that the child has, for an extended amount of time, been in another placement that does not comply with the Act. The good cause determination does not include an independent consideration of the best interest of the Indian child because the preferences reflect the best interests of an Indian child in light of the purposes
- (4) The unavailability of a placement after a showing by the applicable agency in accordance with section F.1., and a determination by the court that active efforts have been made to find placements meeting the preference criteria, but none have been located. For purposes of this analysis, a placement may not be considered unavailable if the placement conforms to the prevailing social and cultural standards of the Indian community in which the Indian child's parent or extended family resides or with which the Indian child's parent or extended family members maintain social and cultural ties.

- (d) The court should consider only whether a placement in accordance with the preferences meets the phymontal and emotional needs of the child; and may not depart from the preferences based on the socioeconomic status of any placement relative to another placement.
- G. Post-Trial Rights
- G.1. What is the procedure for petitioning to vacate an adoption?
- (a) Within two years after a final decree of adoption of any Indian child by a State court, or within any longer period of time permitted by the law of the State, a parent who executed a consent to termination of paternal rights or adoption of that child may petition the court in which the final adoption decree was entered to vacate the decree and revoke the consent on the grounds that consent was obtained by fraud or duress, or that the proceeding failed to comply with ICWA.

(b) Upon the filing of such petition, the court must give notice to all parties to the adoption proceedings and the Indian child's tribe.

(c) The court must hold a hearing on

- the petition. (d) Where the court finds that the parent's consent was obtained through fraud or duress, the court must vacate the decree of adoption, order the consent revoked and order that the child be returned to the parent.
- G.2. Who can make a petition to invalidate an action?
- (a) Any of the following may petition any court of competent jurisdiction to invalidate an action for foster ca placement or termination of parenta rights where it is alleged that the Act has been violated:
- (1) An Indian child who is the subject of any action for foster care placement or termination of parental rights;
- (2) A parent or Indian custodian from whose custody such child was removed;
- (3) The Indian child's tribe. (b) Upon a showing that an action for foster care placement or termination of parental rights violated any provision of 25 U.S.C. 1911, 1912, or 1913, the court must determine whether it is
- appropriate to invalidate the action. (c) There is no requirement that the particular party's rights under the Act be violated to petition for invalidation; rather, any party may challenge the action based on violations in implementing the Act during the course of the child custody proceeding. For example, it is acceptable for the tribe to petition to invalidate an action because

- **F.4.** How is a determination for "good Cause" to depart from the placement preferences made?
- (a) If any party asserts that good cause not to follow the placement preferences exists, the reasons for such belief or assertion must be stated on the record or in writing and made available to the parties to the proceeding and the Indian child's tribe.
- (3) The extraordinary physical or emotional needs of the child, such as specialized treatment services that may be unavailable in the community where families who meet the criteria live, as established by testimony of a qualified expert witness; provided that extraordinary physical or emotional needs of the child does not include ordinary bonding or attachment that may have occurred as a result of a placement or the fact that the child has, for an extended amount of time, been in another placement that does not comply with the ACT. The good cause determination does not include an independent consideration of the best interest of the Indian child because the preferences reflect the best interests of the Indian Child in light of the purposes of the Act.





- **D.4.** Who may serve as a qualified expert witness?
- (a) A qualified expert witness should have specific knowledge of the Indian tribe's culture and customs.
- (b) Persons with the following characteristics, in descending order, are presumed to meet the requirements for a qualified expert witness:
- (4) A professional person having substantial education and experience in the area of his or her specialty who can demonstrate knowledge of the prevailing social and cultural standards and childrearing practices within the Indian child's tribe.

(b) Agencies and State courts should provide the Indian tribe with notice of the voluntary child custody proceedings, including applicable pleadings or executed consents, and their right to intervene under section B.6 of these guidelines.

community or family poverty or isolation, single parenthood, custodian age, crowded or inadequate housing, substance abuse, or nonconforming social behavior does not by itself constitute clear and convincing evidence that continued custody is likely to result in serious emotional or physical damage to the child.

D.4. Who may serve as a qualified expert witness?

- (a) A qualified expert witness should have specific knowledge of the Indian tribe's culture and customs.
- (b) Persons with the following characteristics, in descending order, are presumed to meet the requirements for a qualified expert witness:
- (1) A member of the Indian child's tribe who is recognized by the tribal community as knowledgeable in tribal customs as they pertain to family organization and childrearing practices.
- (2) A member of another tribe who is recognized to be a qualified expert witness by the Indian child's tribe based on their knowledge of the delivery of child and family services to Indians and the Indian child's tribe.
- (3) A layperson who is recognized by the Indian child's tribe as having substantial experience in the delivery of child and family services to Indians, and knowledge of prevailing social and cultural standards and childrearing practices within the Indian child's tribe.
- (4) A professional person having substantial education and experience in the area of his or her specialty who can demonstrate knowledge of the prevailing social and cultural standards and childrearing practices within the Indian child's tribe.
- (c) The court or any party may request the assistance of the Indian child's tribe or the Bureau of Indian Affairs agency serving the Indian child's tribe in locating persons qualified to serve as expert witnesses.

E. Voluntary Proceedings

- E.1. What actions must an agency and State court undertake in voluntary proceedings?
- (a) Agencies and State courts must ask whether a child is an Indian child in any voluntary proceeding under sections B.2. to B.4. of these guidelines.
- (b) Agencies and State courts should provide the Indian tribe with notice of the voluntary child custody proceedings, including applicable pleadings or executed consents, and their right to intervene under section B.6. of these guidelines.

- E.2. How is consent to termination of parental rights, foster care placement or adoption obtained?
- (a) A voluntary termination of parental rights, foster care placement or adoption must be executed in writing and recorded before a court of competent jurisdiction.
- (b) Prior to accepting the consent, the court must explain the consequences of the consent in detail, such as any conditions or timing limitations for withdrawal of consent and, if applicable, the point at which such consent is irrevocable.
- (c) A certificate of the court must accompany a written consent and must certify that the terms and consequences of the consent were explained in detail in the language of the parent or Indian custodian, if English is not the primary language, and were fully understood by the parent or Indian custodian.

(d) Execution of consent need not be made in open court where

- confidentiality is requested or indicated.
 (e) A consent given prior to or within
 10 days after birth of the Indian child is
 not valid.
- E.3. What information should a consent document contain?
- (a) The consent document must contain the name and birthdate of the Indian child, the name of the Indian child's tribe, identifying tribal enrollment number, if any, or other indication of the child's membership in the tribe, and the name and address of the consenting parent or Indian custodian. If there are any conditions to the consent, the consent document must clearly set out the conditions.
- (b) A consent to foster care placement should contain, in addition to the information specified in subsection (a), the name and address of the person or entity by or through whom the placement was arranged, if any, or the name and address of the prospective foster parents, if known at the time.
- E.4. How is withdrawal of consent achieved in a voluntary foster care placement?
- (a) Withdrawal of consent must be filed in the same court where the consent document was executed.
- (b) When a parent or Indian custodian withdraws consent to foster care placement, the child must be returned to that parent or Indian custodian immediately.
- E.5. How is withdrawal of consent to a voluntary adoption achieved?
- (a) A consent to termination of parental rights or adoption may be withdrawn by the parent at any time

- prior to entry of a final decree of voluntary termination or adoption, whichever occurs later. To withdraw consent, the parent must file, in the court where the consent is filed, an instrument executed under oath asserting his or her intention to withdraw such consent.
- (b) The clerk of the court in which the withdrawal of consent is filed must promptly notify the party by or through whom any preadoptive or adoptive placement has been arranged of such filing and the child must be returned to the parent or Indian custodian as soon as practicable.

F. Dispositions

- F.1. When do the placement preferences apply?
- (a) In any preadoptive, adoptive or foster care placement of an Indian child, the Act's placement preferences apply; except that, if the Indian child's tribe has established by resolution a different order of preference than that specified in the Act, the agency or court effecting the placement must follow the tribe's placement preferences.
- (b) The agency seeking a preadoptive, adoptive or foster care placement of an Indian child must always follow the placement preferences. If the agency determines that any of the preferences cannot be met, the agency must demonstrate through clear and convincing evidence that a diligent search has been conducted to seek out and identify placement options that would satisfy the placement preferences specified in sections F.2. or F.3. of these guidelines, and explain why the preferences could not be met. A search should include notification about the placement hearing and an explanation of the actions that must be taken to propose an alternative placement to:
- (1) The Indian child's parents or Indian custodians;
- (2) All of the known, or reasonably identifiable, members of the Indian child's extended family members;
- (3) The Indian child's tribe;
- (4) In the case of a foster care or preadoptive placement:
- (i) All foster homes licensed, approved, or specified by the Indian child's tribe; and
- (ii) All Indian foster homes located in the Indian child's State of domicile that are licensed or approved by any authorized non-Indian licensing authority.
- (c) Where there is a request for anonymity, the court should consider whether additional confidentiality protections are warranted, but a request for anonymity does not relieve the





Public Meetings

Dates and locations for the public meetings are as follows:

Date	Time	Location	Venue	Contact
Wednesday, April 22,	9 a.m. – noon	Portland,	BIA Northwest Regional Office	Academy Fellow Organizing
2015	Local Time	Oregon	911 NE 11 th Avenue	Attendance, Mark Demaray
			Portland, OR 97232	
Thursday, April 23,	1 – 4 p.m.	Rapid City,	Best Western Ramkota Hotel	Academy Fellow Organizing
2015	Local Time	South Dakota	2111 N. Lacrosse Street	Attendance, Jay McCarthy
			Rapid City, SD 57701	
Tuesday, May 5, 2015	1 – 4 p.m.	Albuquerque,	National Indian Programs Training	Academy Fellow Organizing
	Local Time	New Mexico	Center	Attendance,
			1011 Indian School Road, NW,	Larry Jenkins
			Suite 254	
			Albuquerque, NM 87104	
Thursday, May 7, 2015	1 – 4- p.m.	Prior Lake,	Mystic Lake Casino Hotel	Academy Fellow Organizing
	Local Time	Minnesota	2400 Mystic Lake Blvd	Attendance, Mark Fiddler
			Prior Lake, MN 55372	
Tuesday, May 12, 2015	1 – 4 p.m.	Via	888-730-9138	Academy Fellows Organizing
	Eastern Time	Teleconference	Passcode: INTERIOR	Attendance, Steve Hayes and
				Brinton Wright
Thursday, May 14,	1 – 4 p.m.	Tulsa,	Tulsa Marriott Southern Hills	Academy Fellow Organizing
2015	Local Time	Oklahoma	1902 East 71 st	Attendance, Paul "Trip" Swain
			Tulsa, OK 74136	



Best Interest Issue

PP PAGE 3

In its enactment of the Indian Child Welfare Act (herein after ICWA), Congress set forth the following declaration of policy:

"The Congress hereby declares that it is the policy of this Nation, *to protect the best interests of Indian children and* to promote the stability and security of Indian tribes and families by the establishment of minimum Federal standards for the removal of Indian children from their families and the placement of such children in foster or adoptive homes which will reflect the unique values of Indian culture, and by providing assistance to Indian tribes in the operation of children and family service programs." 25 U.S.C.A. §1902 (emphasis added).

A majority of courts have held that the above stated Congressional declaration requires the "best interests" of Indian children to be the paramount focus of the ICWA. See: In re Interest of Bird Head, 331 N.W. 2d 785,791 (Neb. 1983); Matter of Appeal in Maricopa County, 667 P.2d 228, 233-234 (Ariz. App.1983); In the Interest of J.R.H., 358 N.W.2d 311, 317 (Iowa 1984); Matter of Adoption of D.M.J., 741 P.2d 1386 (Okl. 1985); In re Adoption of K.L.R.F., 515 A.2d 33, 34 (Pa. Super. 1986); Matter of Adoption of Halloway, 732 P.2d 962, 971 (Utah 1986); Matter of Adoption of T.R.M., 525 N.E.2d 298, 308 (Ind. 1988); In re Robert T., 246 Cal. Rptr. 168, 175 (Cal. App 6 Dist. 1988); In re Crystal K., 276 Cal. Rptr. 619, 622 (Cal. App. 3 Dist. 1990); In re R.M.S.,128 P.3d 783 (Colo. 2006).

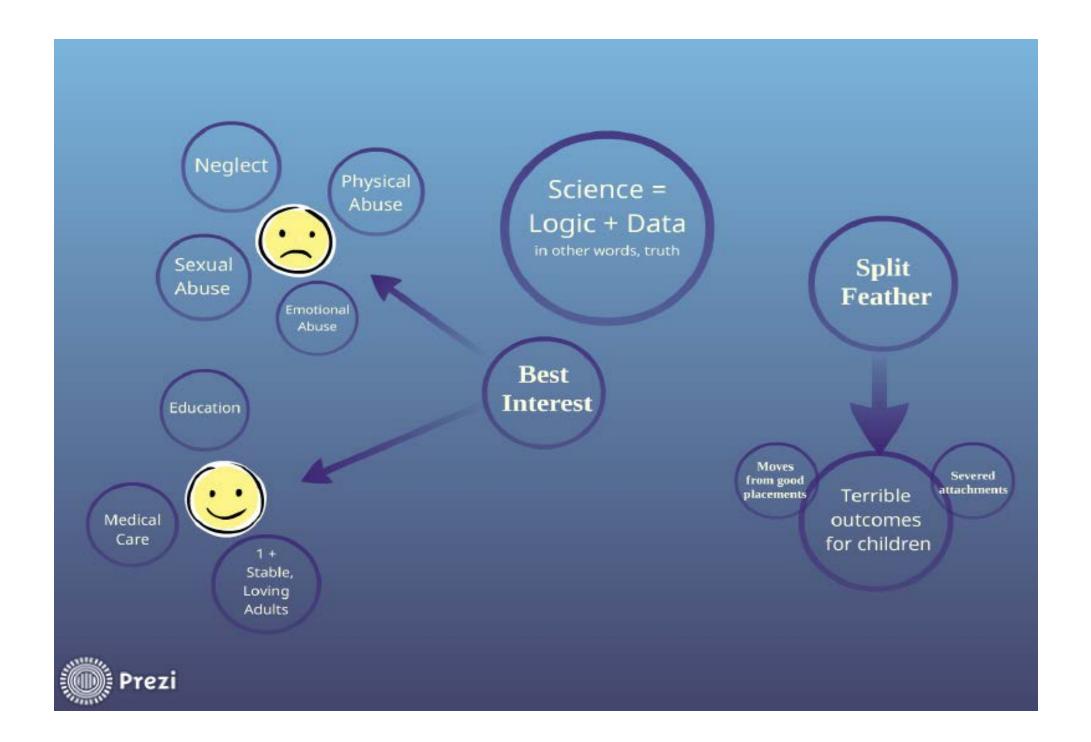




Bonnie Cleaveland







www.adoptionattorneys.org









Academy's Actions Since the February, 2015, Revised Guidelines Were Issued

When the Revised Guidelines were issued, the Academy wanted to take a leadership role by actively and publicly opposing the way in which the Guidelines were issued and some of the provisions of the Guidelines.

The following list is intended to summarize the activities undertaken, to date, by the Academy:





- > The Academy issued a press release which is posted on our website. http://www.adoptionattorneys.org/doc/ICWA-PressRelease(AAAA).pdf
- > State adoption organizations are considering or have issued supportive statements of the Academy's press release. These organizations include the Florida Adoption Council, the New York Attorneys for Adoption and Family Formation, the Arizona Adoption Coalition, and the KC Adoption Council.
- Members of the ICWA Committee are reviewing and analyzing the Guidelines. They are preparing a written analysis which will be posted on our website to assist our members when faced with these issues in their individual practices.
- > This analysis will be the basis for our comments to the Guidelines which are due in mid-May but we plan to have them finalized mid-April.
- The ICWA Committee will be organizing attendance at each of the public meetings being held by the BIA.
- The ICWA Committee will prepare talking points for anyone who wants to attend the public meetings.





- ➤ All Fellows are encouraged to have your local adoption agencies, juvenile court judges, psychologists, counselors, social workers, child advocates, etc. to submit comments
- ➤ The Board of Trustees voted to include the American Academy of Adoption Attorneys as a plaintiff in a lawsuit being filed in federal district court challenging both the Guidelines and eventually the rule.
- ➤ We set up this webinar to organize our efforts so that we can work together effectively.
- We are exploring the opportunity for a political solution with our lobbyist and others to determine if there may be an impact/solution in Washington, D.C.



What Can I Do To Help?

If you would like to help but are not sure how, the American Academy of Adoption Attorneys has created four distinct areas where participation is needed: BIA Public Hearings, Support AAAA Comments, Grass Roots Advocacy and Mental Health Professionals (Best Interest of Children). If you believe you could be of assistance in any of these areas, please contact the individual overseeing the group to volunteer your services. Alternatively, you may indicate which group you are interested in assisting by answering "yes" to any of the following poll questions. Your group leader will then contact you via email with more information.





GRASS ROOTS ADVOCACY

- Jessica Munday
- Trio Solutions Inc.
- 843-216-0442

BIA PUBLIC HEARINGS

- Jay McCarthy
- > 928-779-4252

SUPPORT AAAA COMMENTS

- Laurie Goldheim
- **▶** 845-624-2727
- Goal: AAAA comments will be published mid-April

MENTAL HEALTH PROFESSIONALS BEST INTEREST OF CHILDREN

- Bonnie Cleaveland, PhD ABPP
- **>** 843-571-4005



Jessica Munday





Advocacy

Public support for a particular cause.



Be The Solution



Do you have what it takes to be an advocate and be a part of the solution?

If so...







Next Steps

- Coalition building
- Launching a full-scale campaign to help provide the tools to 'speak up' and 'stand up.'
- Look for social media
- Petitions
- Grassroots instructions to connect with legislators
- Media relations
- And more...



So Who Are We?

Coalition Against the *Misuse* of ICWA (CAMI)





Thank you for attending today's webinar.

Next Webinar Tuesday, April 21, 2015, @ 1:00 EST

WHAT HAVE YOU DONE?