NO. 45134-4-II

COURT OF APPEALS, DIVISION II
OF THE STATE OF WASHINGTON

In re the Dependency of: J.A.,

Minor Child.

RESPONSE TO MOTION FOR DISCRETIONARY REVIEW

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I. IDENTITY OF RESPONDING PARTY

The Respondent Department of Social and Health Services ("the Department"), by and through its attorneys, ROBERT W. FERGUSON, Attorney General, and RENEE N. MORIOKA and CARRIE HOON WAYNO, Assistant Attorneys General, responds to Appellant's Motion for Discretionary Review.

II. STATEMENT OF RELIEF SOUGHT

The Department requests the Court deny the Appellant's request for discretionary review.

III. FACTS RELEVANT TO THE DEPARTMENT'S RESPONSE

The Department filed a dependency petition as to then [redacted] old J.A. in [redacted] alleging that he was dependent under RCW 13.34.030(6)(b) and (c). Appendix A. At the time, J.A. had been in his father's care and the dependency petition alleged that the father and his girlfriend had physically abused J.A., abused methamphetamines, and failed to provide J.A. suitable food and shelter; the mother was alleged to be unable to parent her son due to her developmental delays, past physical abuse and neglect of J.A., and her unstable mental health. Appendix A.

J.A.'s mother failed to appear for her dependency fact-finding trial and, after a hearing, the trial court found J.A. to be dependent because there was "no parent, guardian, or custodian capable of adequately caring

for the child, such that the child is in circumstances which constitute a danger of substantial damage to the child's psychological or physical development". Appendix B at 2. The trial court found the mother was "developmentally delayed and has mental [health] problems" and that J.A. had been in his father's care leading to the court's involvement because the mother "was unable to care for [J.A.]." Appendix B, ¶ 2.2. The court ordered the mother to complete services, including urinalysis testing, a possible drug and alcohol evaluation, and a psychological evaluation with a parenting assessment. Appendix B, ¶ 4.5. The court also ordered weekly visitation between the mother and J.A. Appendix B, ¶ 4.6.

The mother did not appear for the first dependency review hearing several months later. Appendix C. The court found the mother was not in compliance with court-ordered services and had not made progress toward correcting the parental deficiencies that necessitated J.A.'s out-of-home placement. Appendix C, ¶ 2.11. The court also found that the mother had not visited J.A. on a regular basis during the review period due to difficulties in maintaining contact with her. Appendix C, ¶ 2.12. The court adopted the same service plan for the mother as was previously ordered. Appendix C, ¶ 3.9.

In March 2011, the court again found the mother not in compliance with court-ordered services and that she had made no progress in

correcting her parental deficiencies. Appendix D, ¶ 2.11. The court again ordered the mother to complete the same services. Appendix D, ¶ 3.9.

The mother again failed to appear for a hearing in September 2011 and she was found non-compliant and making no progress in correcting her parental deficiencies. Appendix E, ¶ 2.11. The court also ordered that a petition to terminate J.A.'s parents' rights be filed within 30 days. Appendix E, ¶ 3.8.

In February 2012 the court "reserved" its findings regarding the mother's compliance and progress toward correcting her parental deficiencies.[1] (Appendix F, ¶ 2.11). However, the court continued to order the mother to complete the same services (Appendix F, ¶ 3.9) and further ordered that the primary permanent plan for J.A. become adoption with an alternative of long-term foster care (Appendix F, ¶ 5.1).

At the next hearing in July 2012 the court found the mother noncompliant in court-ordered services and making no progress in correcting her parental deficiencies. Appendix G, ¶ 2.11. The mother was again not present for this review hearing. Appendix G, ¶ 1.2. For the sixth time, the court ordered the mother to complete the same services. Appendix G, ¶ 3.9.

[1] There is no reason stated in the court's order for this finding.

The mother appeared for the next hearing in December 2012, and the court found her not in compliance in completing court-ordered services and making no progress. Appendix H, ¶ 2.11. The court ordered the same services for the mother and adjusted her visitation. Appendix H, ¶¶ 3.9, 3.13. The court also amended J.A.'s permanent plan, and adopted a primary plan of Title 13 Guardianship and an alternative plan of adoption. Appendix H, ¶ 5.1.

The Guardian ad Litem assigned to the case is [redacted]. J.A. recognizes [redacted], and reported that [redacted] visits him at his home and his school. Appendix M at 10-11. [redacted] reports to the court that he advises J.A. of his right to request an attorney. *See* Appendix I at 3, 8, 14. The GAL also reports to the court J.A.'s stated wishes – that he wants to return home to his mother. Appendix I at 4, 14.

On March 1, 2013, the University of Washington Child and Youth Advocacy Clinic ("Clinic") filed a Limited Notice of Appearance as counsel for J.A. (Appendix J) and a Motion for Appointment of Counsel for Dependent Child at Public Expense (Appendix K).

The initial hearing on the motion to appoint counsel for J.A. was held on March 14, 2013, before the Honorable Judge Kitty-ann vanDoorninck. The motion was continued to March 21, 2013 so J.A. could be present for the motion. Although they were not dispositive of the

motion, Judge vanDoorninck raised concerns about how the Clinic came to represent J.A. and obtained confidential information about him without notifying the Department or the youth's GAL. Appendix L (Transcript of March 14, 2103 hearing) at 6-12.

The hearing on J.A.'s motion took place on March 21, 2013, and included a conversation on the record between Judge vanDoorninck and J.A., during which only counsel for J.A. and the GAL were present. Appendix M (Transcript of March 21, 2013 hearing) at 4-13. While J.A. is chronologically [redacted], he functions at the level of a [redacted] Appendix O at 2. J.A. stated during the hearing on his motion that he wanted an attorney to talk to the court for him, and to tell the court that he wants to live with his mother. Appendix M at 7. When the court asked J.A. why he needed an attorney to do this for him, he answered, "Because I want one . . . . [A]nd attorneys are cool." Appendix M at 8. The court also learned that J.A. sees his mother every week on Sundays, and they play together at the [redacted]. Appendix M at 9.

The court ultimately denied J.A.'s motion for appointment of counsel. Appendix N. On May 19, 2013, the court supplemented its order with formal findings and an order. Appendix O. On May 20, 2013, counsel for J.A. moved for reconsideration, Appendix P, and on June 17,

2013, the court denied the motion for reconsideration. Appendix Q. This request for Discretionary Review timely followed.

IV. ARGUMENT

A. J.A.'s Motion Should Be Denied Because It Does Not Satisfy the Requirements for Discretionary Review

The appellant, J.A., seeks discretionary review of the trial court's denial of his motion for court-appointed counsel under RAP 2.3(b)(2). The court accepts discretionary review under RAP 2.3(b)(2) when "[t]he superior court has committed probable error and the decision of the superior court substantially alters the status quo or substantially limits the freedom of a party to act. . . ." The appellant has not demonstrated that this case meets these criteria; therefore, this Court should deny his motion for discretionary review.

The appellant cannot demonstrate that the trial court abused its discretion in denying his motion for court-appointed counsel and thereby committed probable error. Orders issued in dependency cases are reviewed under the abuse of discretion standard. *See, e.g., Welfare of J.H.*, 75 Wn. App. 887, 894, 880 P.2d 1030 (1994); *In re Dependency of A.C.*, 74 Wn. App. 271, 275, 873 P.2d 535 (1994).

The trial court's order did not substantially limit the freedom of J.A. to act. During the dependency review period, decisions made by the

court are inherently temporary. *In re Chubb*, 112 Wn.2d 719, 773 P.2d 851 (1989); *In re Dependency of M.A.*, 66 Wn. App. 614, 834 P.2d 627 (1992) ("Because they take place in an ongoing process, the review hearings and the orders issued from them are interlocutory: they are not final, but await possible revision in the next hearing."). The court's order denying appointment of counsel is based on the facts and the parties' interests presented at that time. If future situations arise in which J.A. needs an attorney the court can order one at that time; the order on appeal does not foreclose J.A. from making another motion for appointment of counsel.

B. The Court Did Not Commit Probable Error When It Appropriately Considered the *Mathews* Factors and Denied the Appellant's Motion to Be Appointed Counsel in the Dependency Proceeding

The trial court's decision not to appoint counsel to the appellant was within its sound discretion. The court properly applied the *Mathews v. Eldridge* factors in declining the appellant's request for court-appointed counsel. *See Mathews v. Eldridge*, 424 U.S. 319, 96 S. Ct. 893, 47 L. Ed. 2d 18 (1976).

1. The Trial Court Exercised Sound Discretion in Applying a *Mathews* Analysis to Decide Whether to Appoint Counsel for a Dependent Child

The trial court did not abuse its discretion in applying a *Mathews v. Eldridge* analysis to determine whether appointment of counsel was constitutionally required in this case. An abuse of discretion exists only when no reasonable person would take the position adopted by the court. *Griggs v. Averbeck Reality,* 92 Wn.2d 576, 584, 599 P.2d 1289 (1979). The decision of the court must be "manifestly unreasonable". *Carroll v. Junker,* 79 Wn.2d 12, 26, 482 P.2d 775 (1971) (overruled on other grounds). Where the Supreme Court has endorsed a *Mathews* analysis to determine whether appointment of counsel is constitutionally required in a termination proceeding, which like a dependency proceeding is brought under chapter 13.34 RCW, the trial court's decision to also apply this analysis in a dependency proceeding was not manifestly unreasonable.

In *In re Dependency of M.S.R.*, 174 Wn.2d 1, 271 P.3d 234 (2012), the Washington Supreme Court held that appointment of counsel for all children in termination of parental rights proceedings was not constitutionally required. The Court found that "the due process right of children who are subjects of dependency or termination proceedings to counsel is not universal." *M.S.R.,* 174 Wn.2d at 22. State law and court rules "give trial judges the discretion to decide whether to appoint counsel to

children who are the subjects of dependency or termination proceedings." *Id.* (citing RCW 13.34.100(6)(f) and JuCR 9.2(c)).

The Court endorsed an examination, on a case-by-case basis, of the need for appointment of counsel using the *Mathews v. Eldridge* factors. *Id.*; *see Mathews v. Eldridge*, 424 U.S. 319.[2] The Court first examined two of the *Mathews* factors, recognizing the important liberty interest a child has in maintaining a relationship with family, and that the state has a strong interest in the welfare of the child and an "accurate and just decision." *M.S.R.*, 174 Wn.2d at 15-18. Regarding the third factor – risk of an erroneous decision – the Court acknowledged that there are significant procedural protections in place to ensure an accurate decision. *Id.* at 18. Ultimately, the Court held that each case must be decided on its individual facts and that in *M.S.R.* there was no constitutional violation of the children's rights because there was no evidence to show that appointment of counsel was necessary. *Id.* at 22.

A *Mathews v. Eldridge* analysis is also appropriate when a trial court makes a similar determination in a dependency proceeding. The *M.S.R.* decision endorsed a *Mathews* analysis in termination proceedings, and a similar analysis in a dependency proceeding appropriately provides for

[2] The factors are: "the private interests affected by the proceeding; the risk of error created by the State's chosen procedure; and the countervailing governmental interest supporting use of the challenged procedure." *Mathews v. Eldridge*, 424 U.S. at 335.

consideration of the interests of foster children and their unique circumstances, as well as the risk of error in appointing additional counsel.

While a dependency proceeding differs substantively from a termination proceeding, and a child's rights may be differently implicated in each, similar procedural safeguards are provided in both. In a termination proceeding, the petitioner seeks to terminate the parent-child relationship, which impacts the child's legal relationship with his parents, and extended family. *See M.S.R.*, 174 Wn.2d at 15; RCW 13.34.180, .190. A dependency proceeding, however, concerns the child's ongoing welfare and encompasses matters associated with the child's care and well-being during the dependency. *See* RCW 13.34.130, .136, .138. A dependency finding is subject to review at least every six months following the initial fact finding hearing, thus, the court's decision on issues addressed in each hearing depend on the evidence produced at that time, and do not provide the finality of a termination order. *See* RCW 13.34.138. However, in both proceedings, parents are entitled to court-appointed counsel, absent good cause the child must be appointed a Guardian ad Litem who reports to the court on the child's interests, and parties and the GAL may present evidence and examine witnesses. RCW 13.34.090; RCW 13.34.100.

The *M.S.R.* court concluded that trial courts should apply the *Mathews v. Eldridge* factors in termination proceedings to decide whether

to appoint counsel, and a trial judge appropriately exercises her discretion by similarly doing so in dependency proceedings, as well. This analysis allows the trial court to take into account that "each child's circumstances will be different" when deciding whether "the child's individual and likely unique circumstances" require the appointment of counsel. *M.S.R.*, 174 Wn.2d at 21, 22.

In contrast, providing counsel for every child in a dependency proceeding would not take into account each child's unique circumstances. J.A.'s argument that every child who is the subject of a dependency proceeding is entitled to an attorney, Br. of Appellant at 9-10, is not supported by a *Mathews* analysis, or another analysis, and therefore need not be considered by this Court. *See Cowiche Canyon Conservancy v. Bosley,* 118 Wn.2d 801, 809, 828 P.2d 549 (1992).

Here, the trial court did not abuse its discretion in applying a *Mathews* analysis to determine whether court-appointed counsel was required for J.A. in his dependency proceeding.

2. The Trial Court's Application of the *Mathews* Factors Was a Sound Exercise of Its Discretion

The trial court's decision not to appoint counsel to the appellant was not manifestly unreasonably because it considered the unique facts of this child's situation and, applying the *Mathews* factors, determined that

the additional procedure of appointment of counsel was not constitutionally mandated. The court appropriately considered "[t]he private interests at stake, the government's interest, and the risk that the procedures used will lead to erroneous decisions." *M.S.R.*, 174 Wn.2d at 14 (citing *Lassiter v. Dep't of Soc. Svcs.*, 452 U.S. 18, 27, 101 S. Ct. 2153, 68 L. Ed. 2d 640 (1981)).

The *M.S.R.* court recognized the private interests a child may have in a dependency proceeding, which may require appointment of counsel: a right to be free from unreasonable risk of harm and a right to reasonable safety; the right to basic nurturing, including a safe, stable, and permanent home; and an interest in not being returned to the custody of those who will victimize them. *M.S.R.*, 174 Wn.2d at 17.

While J.A.'s stated interest in his on-going relationship with his mother is significant, the value of court-appointed counsel was reduced because his mother is not fit to care for him. When J.A. was asked what an attorney could do for him, he said, "Like, I want to go home to my mom." Appendix M at 7. When asked if there was anything else an attorney could do for him, he said, "No." *Id.* However, since the first review hearing on September 27, 2010, the mother had never been found in compliance with court-ordered services or progressing in remedying her parenting deficiencies. Appendix O at 2. The mother remained incapable

of caring for her son. Appendix O at 3. Thus, the stated reason J.A. testified to in support of being appointed counsel – to return to his mother's care – was not an option available to him, regardless of whether counsel was appointed to represent him.[3]

The government's interest is its *parens patriae* interest in the child's welfare, obtaining an accurate decision, and in reducing the county's administrative burden and cost of appointing counsel. While the trial court did not reference this in its decision, *M.S.R.* recognized that "the State has a compelling interest in both the welfare of the child and in an accurate and just decision." *M.S.R.*, 174 Wn.2d at 18. The court considered the countervailing government interest of "limited resources for attorneys for children in this county." Appendix Q at 3. As *Mathews* observed, "the Government's . . . administrative resources is a factor that must be weighed. At some point the benefit of an additional safeguard . . . may be outweighed by the cost." *Mathews*, 424 U.S. at 348.

Further, the risk of error weighed in favor of denying the appellant's motion because other parties to the proceeding could advocate

[3] In support of his motion for reconsideration, J.A. submitted a declaration stating that he was also concerned that his father "might be [redacted]" and he did not want to see his dad. Appendix P at 1. However, there was no motion before the court to change the father's contact with J.A., nor had the father attempted to re-establish contact with him. Appendix Q at 2. Therefore, the issue of contact with the father was not ripe for consideration by the court. If it were raised, the court may again consider whether, under the facts at that time, court-appointed counsel is required.

for his interests. "[W]hether there is a constitutionally significant risk of an erroneous deprivation of rights may also turn on whether there is someone in the case who is able to represent the child's interests or whose interests align with the child's." *M.S.R.*, 174 Wn.2d at 18. Here, the mother's interest in reunification and increased contact with her son align with his stated interest in both of these issues, and she is represented and able to raise these issues at will. Additionally, the Guardian ad Litem represents J.A.'s interests, including communicating J.A.'s stated interest, to the court based on his strong relationship with J.A. and his visits to his home and school. *See* Appendix M at 10-11; Appendix I at 3-4, 8-9, 14.

There is no evidence to indicate that *only* an attorney representing the child's interest will improve the process, and this issue was not decided in *M.S.R.* *See M.S.R.*, 174 Wn.2d at 19. Under some circumstances, appointing attorneys who will attempt to tilt the outcome in the direction of the child's wishes may make it more likely that there will be an erroneous result. *See* Martin Guggenheim, *Reconsidering The Need For Counsel For Children In Custody, Visitation and Child Protection Proceedings*, 29 Loy. U. Chi. L.J. 299, 344 (Winter 1998). As here, a child may want to return home to an unfit parent. Advocacy by a child's attorney to this effect will make it less likely, not more likely, that the correct legal result will be reached.

Moreover, the risk of error of court-appointed counsel for J.A. was heightened due to his limited developmental abilities and resulting diminished ability to direct counsel. A child's developmental level plays a role in his ability to benefit from counsel. *See M.S.R.*, 174 Wn.2d at 21. J.A. is chronologically [redacted], but he functions at the level of a [redacted] Appendix O at 2, ¶ 3. He wanted an attorney to advocate for him because "attorneys are cool." Appendix M at 8. To the extent J.A. cannot understand the legal implications of advocacy on his behalf, his attorney would advocate for his best interests, rather than his stated interests. This can lead to "a system where the position taken by a child's attorney may largely be based, not on what would be best for the individual child with unique needs and values, but rather on the arbitrary chance of who was appointed to represent the particular child." Randi Mandelbaum, *Revisiting The Question Of Whether Young Children In Child Protection Proceedings Should Be Represented By Lawyers*, 32 Loy. U. Chi. L.J. 1, 36 (Fall 2000).

After considering J.A.'s private interest in reunification with his mother, the government's interest, and the risk of error in appointing additional counsel, the court did not abuse its discretion in denying the request to appoint counsel to the appellant.

C. RCW 13.34.100 Does Not Violate the Due Process Clause of the Washington Constitution, Article I, Section 3 and the *Gunwall* Factors Do Not Support Broader Due Process Protections for Children Under the State Constitution

The appellant argues that the due process clause of the Washington Constitution provides an independent right to court-appointed counsel to dependent children. Br. of Appellant at 17. This argument fails because the due process clause of the state constitution does not mandate appointment of counsel for every child in dependency proceedings.

The six *Gunwall* factors govern whether a state constitutional provision extends broader rights than its federal analog. *In re Marriage of King*, 162 Wn.2d 378, 392, 174 P.3d 659 (2007).

The first and second *Gunwall* factors consider the text and textual differences between the state and federal provisions. *State v. Gunwall*, 106 Wn.2d 54, 61, 720 P.2d 808 (1986).. This Court has repeatedly recognized that the first and second *Gunwall* factors do not support a more expansive interpretation of the state due process clause. "[T]here are no material differences between the 'nearly identical' federal and state provisions. This disposes of the first two *Gunwall* factors." *In re Personal Restraint of Matteson*, 142 Wn.2d 298, 310, 12 P.3d 585 (2000) (footnote omitted) (quoting *State v. Ortiz*, 119 Wn.2d 294, 303, 831 P.2d 1060 (1992)); *In re Marriage of King*, 162 Wn.2d at 392 (language of

state and federal provisions is identical).

The third *Gunwall* factor considers whether the state constitutional provision's history reflects "an intention to confer greater protection" than its federal counterpart. *Id.* at 61. Washington's State Constitutional Convention adopted the due process clause as proposed, without modification or debate. *Journal of the Washington State Constitutional Convention,* 1889 § 3, at 495–96 (Beverly Paulik Rosenow ed. 1962). Thus, no legislative history "provide[s] a justification for interpreting the identical provisions differently." *State v. Ortiz*, 119 Wn.2d 294, 303, 831 P.2d 1060 (1992) (considering Rosenow at 495–96).

The fourth *Gunwall* factor, preexisting state law, likewise establishes no basis to expand state due process protections for children. It "requires [the court] to consider the degree of protection that Washington State has historically given in similar situations." *Grant Cnty. Fire Prot. Dist. 5 v. City of Moses Lake*, 150 Wn.2d 791, 809, 83 P.3d 419 (2004) (focusing analysis of article I, section 12 on law around the time the provision was adopted). Nineteenth century law and society provided little or no protection when a problem concerned a child's safety within the family. Marvin R. Ventrell, *Rights & Duties: An Overview Of The Attorney-Child Client Relationship*, 26 Loy. U. Chi. L.J. 259, 264 (Winter 1995). Thus, at the time the constitution was adopted, the concept of a

lawyer representing a child's stated interests in a parental rights termination action would have been completely foreign.

Instead of focusing on historical legal protections as *Gunwall* directs, J.A. points to *In re Dependency of Grove*, 127 Wn.2d 221, 897 P.2d 1252 (1995). He claims this case somehow informs the intended scope of article 1, section 3. Br. of Appellant at 18. This is incorrect. First, the fourth *Gunwall* factor looks to the law existing when a constitutional provision was adopted, and that is not informed by court decisions issued more than 100 years later. Second, *Grove* relies merely on *In re Welfare of Luscier*, 84 Wn.2d 135, 137, 524 P.2d 906 (1974), and *In re Welfare of Myricks*, 85 Wn.2d 252, 533 P.2d 841 (1975) without analyzing either case. Both of these cases predated the Supreme Court decision in *Lassiter*, 452 U.S. 18, which analyzed whether the due process clause of the federal constitution entitled an indigent parent to counsel in a termination case. Neither case establishes broader protections under the state due process clause. *Bellevue School District v. E.S.*, 171 Wn.2d 695, 257 P.3d 570 (2011) (noting *Luscier* "did not separately analyze the state and federal constitutional provisions at issue").[4]

[4]*Grove*, which considered when civil appellate counsel would be provided at public expense, recited without further analysis that a constitutional right to legal representation exists "where a fundamental liberty interest, similar to the parent-child relationship, is at risk[.]" *Grove*, 127 Wn.2d at 237 (citing *In re Luscier*, 84 Wn.2d 135 and *In re Myricks*, 85 Wn.2d 252, 533 P.2d 841 (1975)).

The Washington Supreme Court has held that the fifth factor, structural differences between the state and federal constitutions, supports an independent analysis. *In re Marriage of King*, 162 Wn.2d at 393. However, this factor argues for independent analysis in every case, and does not dictate that such an analysis supports broader rights under the state due process clause.

Regarding the sixth factor, issues of family relations are generally matters of state or local concern. *In re Custody of R.R.B.*, 108 Wn. App. 602, 620, 31 P.3d 1212 (2001) (citing *Rose v. Rose*, 481 U.S. 619, 625, 107 S. Ct. 2029, 95 L. Ed. 2d 599 (1987)). As is the case with the fifth factor, the fact that this factor may support an independent analysis does not mean that article I, section 3 provides greater due process protection in this context and J.A. offers no sound argument to the contrary.

This Court "traditionally has practiced great restraint in expanding state due process beyond federal perimeters." *City of Bremerton v. Widell*, 146 Wn.2d 561, 579, 51 P.3d 733 (2002). As the Washington Supreme Court found in *M.S.R.* regarding termination proceedings, the due process clause of the state constitution also does not mandate appointment of counsel for every child in every dependency case. Accordingly, RCW 13.34.100 does not violate the state's due process clause.

V. CONCLUSION

The Department requests that this Court deny discretionary review because the trial court properly exercised its discretion in declining the appellant's request to be appointed counsel when his interests were adequately represented by other parties in the dependency proceeding.

RESPECTFULLY SUBMITTED this 19 day of August, 2013.

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