

FINDING HARM

The Code...

It is not the duty of the court to determine whether the child would be harmed if removed from the parent's care and custody (see *Watts v. Watts*, 2010 Ga. App. 101, 860 S.E.2d 101, 102 (2016)).

Only four years ago, our court, sitting en banc, said that the relevant question is "whether the child would be harmed if removed from the parent's care and custody (see *Watts v. Watts*, 2010 Ga. App. 101, 860 S.E.2d 101, 102 (2016)).

Because the harm factor is substantially the same as that in the old code, cases construing the old code remain authoritative on the issue. *ITO S.P.*, 336 Ga. App. 488, 499 (2016).

(This Court has recognized, in at least one case, that "harm" should be determined in light of the child's best interests, including the child's physical and emotional well-being, and the child's relationship with the parent. *Watts v. Watts*, 2010 Ga. App. 101, 860 S.E.2d 101, 102 (2016)).

Some evidence used to address the other findings may be used to support the finding of harm, but the conclusion does not flow automatically because the previous prongs have been satisfied. *ITO S.P.*, 336 Ga. App. 487, 492 (2016).

The Code...

(a) In considering the termination of parental rights, the court shall first determine whether one of the following statutory grounds for termination of parental rights has been met:

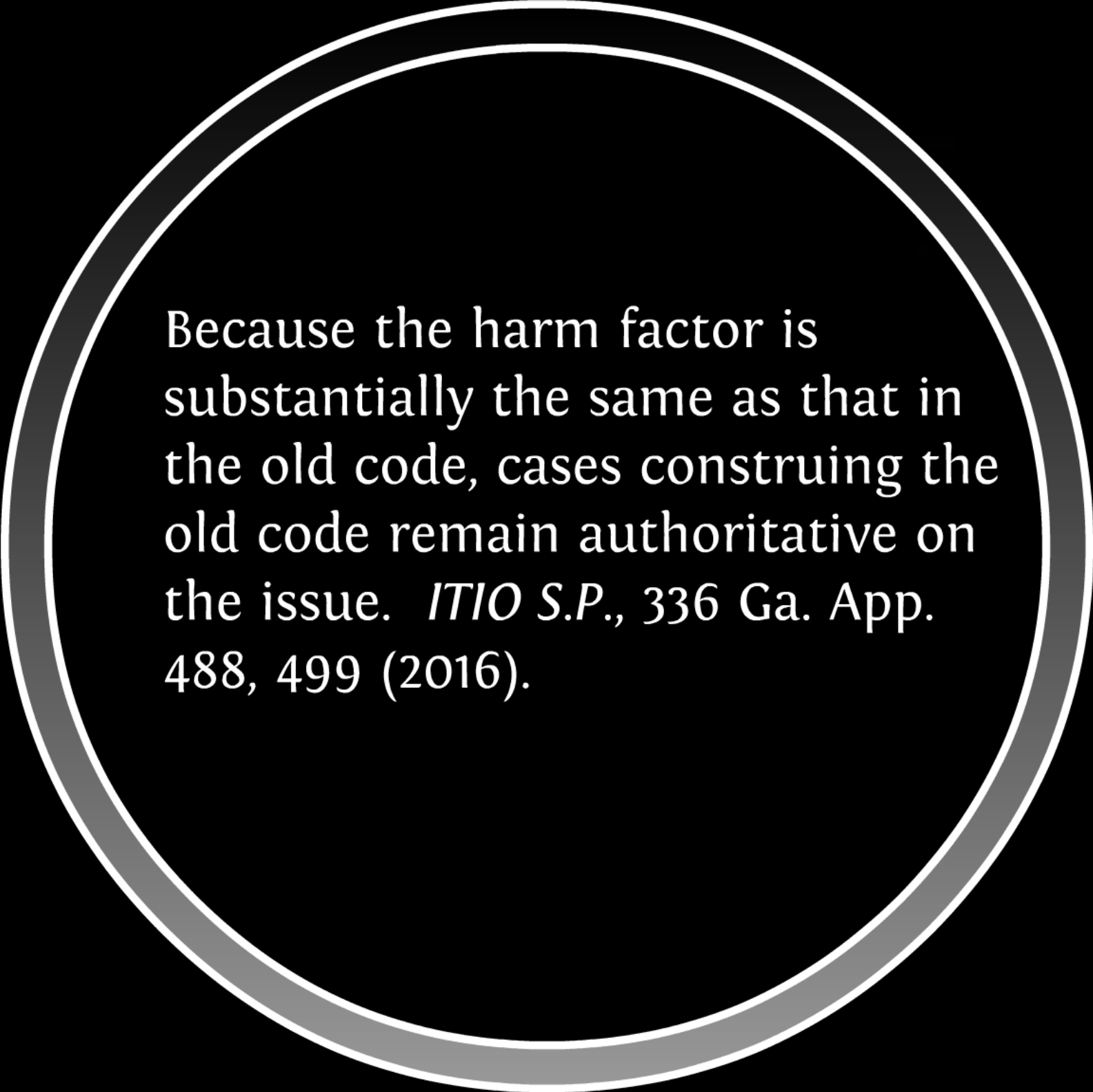
(5) A child is a dependent child due to lack of proper parental care or control by his or her parent, reasonable efforts to remedy the circumstances have been unsuccessful or were not required, such cause of dependency is likely to continue or will not likely be remedied, and **the continued dependency will cause or is likely to cause serious physical, mental, emotional, or moral harm to such child.**

O.C.G.A. § 15-11-310

(a) In considering the termination of parental rights, the court shall first determine whether one of the following statutory grounds for termination of parental rights has been met:

(5) A child is a dependent child due to lack of proper parental care or control by his or her parent, reasonable efforts to remedy the circumstances have been unsuccessful or were not required, such cause of dependency is likely to continue or will not likely be remedied, and **the continued dependency will cause or is likely to cause serious physical, mental, emotional, or moral harm to such child.**

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Because the harm factor is substantially the same as that in the old code, cases construing the old code remain authoritative on the issue. *ITIO S.P.*, 336 Ga. App. 488, 499 (2016).

Same evidence used to adduce the other findings may be used to support the finding of harm, but the conclusion does not flow automatically because the previous prongs have been satisfied. *ITIO B.J.F.*, 276 Ga. App. 437, 442 (2005); *ITIO O.B.*, 337 Ga. App. 401, 404 (2016).

Only five years ago, our Court, sitting en banc, said that the relevant question is “whether the child would be harmed if returned to the parent’s care and control, associated environment, and state of deprivation.” [cits. omitted] Notwithstanding the decision of the en banc Court ... however, some panels of our Court have framed the question differently in more recent cases, inquiring whether a continuation of the status quo-rather than the return of a child now in the custody of the Department to the custody of the natural parents-likely would harm the child.

ITIO M.S.S., 308 Ga. App. 614, 622, 708 S.E.2d 570, 577 (2011)



ITIO E.M.D.

339 Ga. App. 189

10/28/16



2012 Removal

2015 TPR

Substance abuse

Failure to pay support

Failure to maintain bond



These findings used to support

Dependency

Parental fault/cause

Likely to continue

Harm must be shown in
BOTH areas addressed in
M.S.S.:

- *Harm if returned to parent
- *Harm from continued
foster care

Harm from remaining in foster care may be shown in two ways:

(1) the extent to which instability and impermanency are “currently causing specific harms” to the child or

(2) whether the parent’s current relationship with the child is itself detrimental.

"[O]ur law requires a juvenile court to consider both the relationship between the parent and child at the time of the termination hearing and what might happen if the child were returned to the parent." E.M.D.

In other words, harm from remaining in care AND harm from going home.

The Court of Appeals found that there was no evidence that the children's relationship with the mother was detrimental (she attended visits, had a visit in her home, visits were positive, and the children were happy to see the mother and experienced no adverse reactions to visits).

It also found that there was no evidence of specific harm due to instability and impermanency: “The only non-generalized findings by the trial court on this point were (1) that the children were ‘confused, fearful and distrustful of others,’ and (2) the children were ‘aware of, and disappointed in, the parents’ failures to complete reunification goals and desire to be out of foster care.’ This is not enough.”

“In the light of these considerations, we conclude that the evidence here does not support the trial court's conclusion that the children will be harmed seriously were they to remain in foster care, by virtue of either their relationship with their mother or the impermanency of that situation. Therefore, whatever possibility of harm might exist were the children to be returned to the mother bears little significance.”

Is the E.M.D. decision something new?

In 2011 *ITIO M.S.S.* (308 Ga. App. 614) made the same analysis, considering harm from both return to the mother and continuation in foster care.

Although a caseworker gave general testimony in response to leading questions that the Department was concerned about the detrimental effects of foster care on the child, there was no evidence that K.D.E. was experiencing difficulties, such as behavioral or social issues, from being in foster care or that he would experience difficulties if a permanent placement was not put into place; and there was no testimony that a continued relationship with his mother would result in any potential or actual harm to the child.

ITIO K.D.E., 288 Ga. App. 520, 526 (2007)

Although a caseworker gave general testimony in response to leading questions that the Department was concerned about the detrimental effects of foster care on the child, there was no evidence that K.D.E. was experiencing difficulties, such as behavioral or social issues, from being in foster care or that he would experience difficulties if a permanent placement was not put into place; and there was no testimony that a continued relationship with his mother would result in any potential or actual harm to the child.

ITIO K.D.E., 288 Ga. App. 520, 526 (2007)

ITIO D.M., 339 Ga. App. 46 (2016)

ITIO S.P., 336 Ga.App. 488 (2016)



ITIO A.S., et al.
339 Ga. App. 875
12/8/16



ITIO A.S., et al.
339 Ga. App. 875
12/8/16



ITIO A.S., et al.
339 Ga. App. 875
12/8/16



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12/8/16



ITIO A.S., et al.
339 Ga. App. 875
12/8/16

TPR order based on continued substance abuse, instability, and failure to pay child support.

Ct. App. noted that the instability consisted of mom's working at fast food places and living in a trailer that belonged to her sister, which was without power for several months at one point. The Ct. App. did not find this sufficient evidence of instability, and but for the SA issue, would never have reached the harm issue.

In its order, the juvenile court found that the children would suffer harm if they remained in foster care because they would “experience doubt, uncertainty and hesitancy in life[.]” The juvenile court further stated that foster care would not provide the kind of stability the children needed, and would put them at risk of delinquency, other anti-social behavior, and “foster care drift.” And at the hearing, the expert testified the children would be especially susceptible to these risks due to their young ages.

But this testimony did not rise substantially above general assertions that long-term foster care is harmful. And there was no evidence that the children’s continued relationship with their mother was harmful. Such testimony is insufficient to show how each individual child will be harmed by the status quo to the degree necessary to justify termination of the mother’s parental rights

Interest of A.S., 339 Ga. App. 875, 881–82, 794 S.E.2d 672, 678 (2016)

Compare *In re S.P.*, 336 Ga.App. 488, 499–500 (2) (c), 784 S.E.2d 846 (2016) (adequate showing of harm where mother's recurring psychological and repeated incarcerations prevented development of parental bond, the provision of stability for the child, and caused child distress during visitation).

Interest of A.S., 339 Ga. App. 875, 882, 794 S.E.2d 672, 678 (2016)

...we do not consider whether a child would be better off with a foster family when deciding to sever the natural parent-child relationship...

Interest of A.S., 339 Ga. App. 875, 882, 794 S.E.2d 672, 678 (2016) [note 5]

ITIO L.P., et al.

339 Ga. App. 651

11/18/16

ITIO L.P., et al.
339 Ga. App. 651
11/18/16

ITIO L.P., et al.
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11/18/16

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11/18/16

ITIO L.P., et al.
339 Ga. App. 651
11/18/16

"The juvenile court entered an order terminating the parental rights of the mother and father. The court cited the lack of stable employment, income, and housing for the parents, continued substance abuse and failure to complete treatment by both parents, the mother's continued incarceration, and the father's history of lack of participation in treatment programs and in the case plan more generally."

"The record makes clear that the mother's ongoing drug problem substantially contributed to her inability to provide for the needs of her children, as her incarceration and her related inability to maintain stable housing or employment all stem from her drug use. Where, as here, the mother's drug use has a deleterious effect on her ability to parent, the juvenile court is justified in finding that the children's dependency was likely to continue."

"The juvenile court found that the children would be harmed if returned to their parents because of their parents' inability to provide stability for their children, and because of their substance abuse and past incarceration and domestic violence issues. This finding is supported by the record."

'The record also supports a finding that the children would continue to suffer harm under the current arrangement. The expert testified that one of the children, L.P., experienced behavioral problems and would fight with one of her siblings around the time she resumed visits with her parents. The therapist for the two older children, L.P. and J.P., testified that the inconstancy of the visits with their parents had negative consequences on the children, and that the children would experience mood shifts and drops in their activity level and motivation after visits with their parents. The children's foster mother testified that when visits with their parents resumed, J.P. became more argumentative and combative and experienced problems at school, L.P. experienced similar school troubles, and the youngest child, P.P., showed signs of anxiety at being separated from his **258 foster parents. However, these troubles dissipated when visits with the mother and father were discontinued.'

ITIO L.P., 339 Ga. App. 651, 657, 794 S.E.2d 252, 257-58 (2016)

ITIO L.L.
A16A1953
03/01/17


How much deference must experts
be given?

Court ordered forensic evaluation of 13 y/o
after competency motion by counsel.

After a thorough examination, the expert
testified that the child was not competent to
stand trial. Court disagreed. Affirmed.

Triers of fact may not
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but may choose not to adhere
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4 factors that could reasonably
lead a trier of fact to discount
expert testimony:

1. The expert's testimony is inconsistent with the common sense of the jury.

2. The expert's testimony is inconsistent with the scientific principles of the field.

3. The expert's testimony is inconsistent with the facts of the case.

4. The expert's testimony is inconsistent with the expert's own testimony.

4 factors that could reasonably lead a trier of fact to discount expert testimony:

- (1) the correctness or adequacy of the factual assumptions on which the expert opinion is based;
- (2) possible bias in the experts' appraisal of the defendant's condition;
- (3) inconsistencies in the expert's testimony, or material variations between experts; and
- (4) the relevance and strength of the contrary lay testimony.

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CONSIDERATIONS

Adjudicatory hearings demand judicial factual agnosticism. There are four elements involved:

1. The record
2. The detailed oral finding of fact
3. The detailed oral conclusion of law
4. The written order reflecting 1,2, & 3.

The Record defines the legal reality of each case.

If it's not on the record, it doesn't exist as a legal fact.

You must insist on the consideration of evidence from the record ONLY, whether by stipulation or by proof at trial.

What About Judicial Notice?

It is well settled that "the taking of judicial notice of facts is, as a matter of evidence law, a highly limited process. The reason for this caution is that the taking of judicial notice bypasses the safeguards which are involved with the usual process of proving facts by competent evidence in ... court." Further, "in order for a fact to be judicially noticed ... indisputability is a prerequisite."

Emory Healthcare, Inc. v. Pardue, 328 Ga. App. 664, 669 (2014)

Although "[a] trial court may take judicial notice of its own records[,] (citations omitted.), ... a trial court cannot take judicial notice of matters that are the subject of proof in the case.

Emory Healthcare, Inc. v. Pardue, 328 Ga. App. 664, 669-70 (2014)

In order to take judicial notice of any fact, the trial court "must first announce its intention to do so on the record, and afford the parties an opportunity to be heard regarding whether judicial notice should be taken."

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Requirements

Very thorough, specific fact-finding

Competent expert testimony

Clearly-reasoned conclusions of law

An exemplary record

□ Requirements

Very thorough, specific fact-finding

Competent expert testimony

In the absence of this permanency plan, the children will experience doubt, uncertainty and hesitancy in life, which the court finds will be harmful to the children. A foster family placement, despite its good intentions, in many cases does not permit the kind of commitment and continuity that permanency consists of. Foster homes can be more easily disrupted than permanent homes. Children who remain in foster care indefinitely will often develop attachment disorders as they grow older and because of continued instability, may resort to delinquent or other anti-social behaviors. Prolonged foster care, known as “foster care drift”, would therefore be harmful to the children. For these reasons, the children will experience harm if the permanency plan of adoption is not effectuated.

Do not focus on standard of living.

Do not talk about the child's
relationship with the foster family.

very thorough, specific fact-finding

Competent expert testimony

Clearly-reasoned conclusions on

Competent expert testimony

Clearly-reasoned conclusions of law

An exemplary record

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An exemplary record

ITIO D.W.
A16A1610
03/07/17 [see
transcript - good
evid., but bad order]

In summary, the juvenile court in her order set forth many detailed facts and stated the conclusion that the cause of the children's present dependency was likely to continue. But, in attempting to state the process by which that conclusion was reached, the juvenile court failed to point to specific facts that supported the conclusion. While she referred generally to all of her factual findings, she emphasized specific facts that were contradicted by some of her other factual findings or were insufficient to support her conclusion.

"Based upon these facts (the detailed factual findings set forth earlier in the order), the Court finds that the four children that are the subject of this appeal are dependent children as to their mother due to her lack of proper parental care or control. In addition to the findings of fact made throughout this order, court orders have been entered finding these children to be dependent and those orders stand today. The children are dependent now due to the horrific emotional and behavioral instability of each of the four children."

The cause of dependency is likely to continue and will not likely be remedied. [The father] is gone. [The mother] is new in her recovery. The behaviors of all four children could not be managed by the very best of parents. If they are together, their traumatic memories are triggered and they attack each other. [The mother] would be part of those traumatic memories even for those children who say they want to go home to her.

In summary, the juvenile court in her order set forth many detailed facts and stated the conclusion that the cause of the children's present dependency was likely to continue. But in attempting to state the process by which that conclusion was reached, the juvenile court failed to point to specific facts that supported the conclusion. While she referred generally to all of her factual findings, she emphasized specific facts that were contradicted by some of her other factual findings or were insufficient to support her conclusion.

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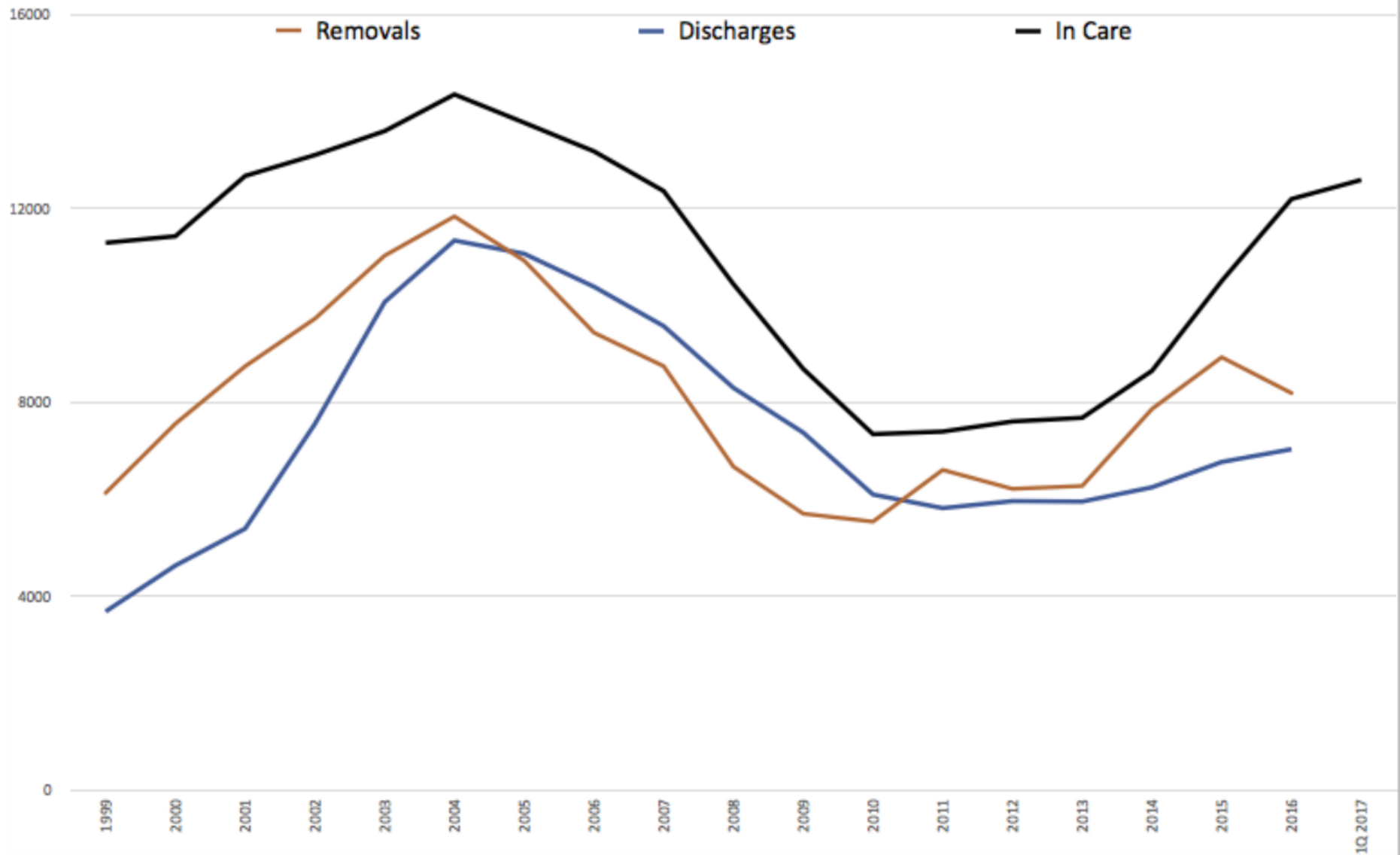
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Guardianship



Statutory Frequency Cycle
Guardianship
Guardianship
Guardianship
Guardianship

GEORGIA CPS DYNAMICS (Source: www.fosteringcourtimprovement.org)



Statutory Permanency Options

Reunification

Discharges: April 2016 - March 2017

Total: 7,042
Reun: 3,847
Adopt: 1,070
Relative: 891
APPLA: 566
Guardian: 427

Guardianship

TPR/Adoption

APPLA (16 y/o and older)

Discharges: April 2016 - March 2017

Total:	7,042
Reun:	3,847
Adopt:	1,120
Relative:	895
APPLA:	566
Guardian:	427

FINDING HARM

The Code..

unambiguously predicting a general rule, it is not clear that this is a significant improvement on the previous practice of attempting to derive specific rules for the individual.

[illegible]

Because the harm factor is substantially the same as that in the old code, cases construing the old code remain authoritative on the issue. *ITIO S.P.*, 336 Ga. App. 488, 499 (2016).

Job Cost: Job cost accounting is used after the fact. If the dollars should not be required to figure accurately and frequently in business, management controls need not measure at home and avoid the quality, as they are likely to suffer serious structural problems. This approach does not assume recognition of this principle, we provide cost-based information and individualized evidence claims is assigned to economic finding that is still by a need for performance and quality. But once it is required, such evidence supports in this case.

500 C1, 20-06, 00-05, 00-11, 01-12, 02-03, 02-04, 02-05, 02-06, 02-07, 02-08, 02-09, 02-10, 02-11, 02-12, 02-13, 02-14, 02-15, 02-16, 02-17, 02-18, 02-19, 02-20, 02-21, 02-22, 02-23, 02-24, 02-25, 02-26, 02-27, 02-28, 02-29, 02-30, 02-31, 02-32, 02-33, 02-34, 02-35, 02-36, 02-37, 02-38, 02-39, 02-40, 02-41, 02-42, 02-43, 02-44, 02-45, 02-46, 02-47, 02-48, 02-49, 02-50, 02-51, 02-52, 02-53, 02-54, 02-55, 02-56, 02-57, 02-58, 02-59, 02-60, 02-61, 02-62, 02-63, 02-64, 02-65, 02-66, 02-67, 02-68, 02-69, 02-70, 02-71, 02-72, 02-73, 02-74, 02-75, 02-76, 02-77, 02-78, 02-79, 02-80, 02-81, 02-82, 02-83, 02-84, 02-85, 02-86, 02-87, 02-88, 02-89, 02-90, 02-91, 02-92, 02-93, 02-94, 02-95, 02-96, 02-97, 02-98, 02-99, 02-100, 02-101, 02-102, 02-103, 02-104, 02-105, 02-106, 02-107, 02-108, 02-109, 02-110, 02-111, 02-112, 02-113, 02-114, 02-115, 02-116, 02-117, 02-118, 02-119, 02-120, 02-121, 02-122, 02-123, 02-124, 02-125, 02-126, 02-127, 02-128, 02-129, 02-130, 02-131, 02-132, 02-133, 02-134, 02-135, 02-136, 02-137, 02-138, 02-139, 02-140, 02-141, 02-142, 02-143, 02-144, 02-145, 02-146, 02-147, 02-148, 02-149, 02-150, 02-151, 02-152, 02-153, 02-154, 02-155, 02-156, 02-157, 02-158, 02-159, 02-160, 02-161, 02-162, 02-163, 02-164, 02-165, 02-166, 02-167, 02-168, 02-169, 02-170, 02-171, 02-172, 02-173, 02-174, 02-175, 02-176, 02-177, 02-178, 02-179, 02-180, 02-181, 02-182, 02-183, 02-184, 02-185, 02-186, 02-187, 02-188, 02-189, 02-190, 02-191, 02-192, 02-193, 02-194, 02-195, 02-196, 02-197, 02-198, 02-199, 02-200, 02-201, 02-202, 02-203, 02-204, 02-205, 02-206, 02-207, 02-208, 02-209, 02-210, 02-211, 02-212, 02-213, 02-214, 02-215, 02-216, 02-217, 02-218, 02-219, 02-220, 02-221, 02-222, 02-223, 02-224, 02-225, 02-226, 02-227, 02-228, 02-229, 02-230, 02-231, 02-232, 02-233, 02-234, 02-235, 02-236, 02-237, 02-238, 02-239, 02-240, 02-241, 02-242, 02-243, 02-244, 02-245, 02-246, 02-247, 02-248, 02-249, 02-250, 02-251, 02-252, 02-253, 02-254, 02-255, 02-256, 02-257, 02-258, 02-259, 02-260, 02-261, 02-262, 02-263, 02-264, 02-265, 02-266, 02-267, 02-268, 02-269, 02-270, 02-271, 02-272, 02-273, 02-274, 02-275, 02-276, 02-277, 02-278, 02-279, 02-280, 02-281, 02-282, 02-283, 02-284, 02-285, 02-286, 02-287, 02-288, 02-289, 02-290, 02-291, 02-292, 02-293, 02-294, 02-295, 02-296, 02-297, 02-298, 02-299, 02-300, 02-301, 02-302, 02-303, 02-304, 02-305, 02-306, 02-307, 02-308, 02-309, 02-310, 02-311, 02-312, 02-313, 02-314, 02-315, 02-316, 02-317, 02-318, 02-319, 02-320, 02-321, 02-322, 02-323, 02-324, 02-325, 02-326, 02-327, 02-328, 02-329, 02-330, 02-331, 02-332, 02-333, 02-334, 02-335, 02-336, 02-337, 02-338, 02-339, 02-340, 02-341, 02-342, 02-343, 02-344, 02-345, 02-346, 02-347, 02-348, 02-349, 02-350, 02-351, 02-352, 02-353, 02-354, 02-355, 02-356, 02-357, 02-358, 02-359, 02-360, 02-361, 02-362, 02-363, 02-364, 02-365, 02-366, 02-367, 02-368, 02-369, 02-370, 02-371, 02-372, 02-373, 02-374, 02-375, 02-376, 02-377, 02-378, 02-379, 02-380, 02-381, 02-382, 02-383, 02-384, 02-385, 02-386, 02-387, 02-388, 02-389, 02-390, 02-391, 02-392, 02-393, 02-394, 02-395, 02-396, 02-397, 02-398, 02-399, 02-400, 02-401, 02-402, 02-403, 02-404, 02-405, 02-406, 02-407, 02-408, 02-409, 02-410, 02-411, 02-412, 02-413, 02-414, 02-415, 02-416, 02-417, 02-418, 02-419, 02-420, 02-421, 02-422, 02-423, 02-424, 02-425, 02-426, 02-427, 02-428, 02-429, 02-430, 02-431, 02-432, 02-433, 02-434, 02-435, 02-436, 02-437, 02-438, 02-439, 02-440, 02-441, 02-442, 02-443, 02-444, 02-445, 02-446, 02-447, 02-448, 02-449, 02-450, 02-451, 02-452, 02-453, 02-454, 02-455, 02-456, 02-457, 02-458, 02-459, 02-460, 02-461, 02-462, 02-463, 02-464, 02-465, 02-466, 02-467, 02-468, 02-469, 02-470, 02-471, 02-472, 02-473, 02-474, 02-475, 02-476, 02-477, 02-478, 02-479, 02-480, 02-481, 02-482, 02-483, 02-484, 02-485, 02-486, 02-487, 02-488, 02-489, 02-490, 02-491, 02-492, 02-493, 02-494, 02-495, 02-496, 02-497, 02-498, 02-499, 02-500, 02-501, 02-502, 02-503, 02-504, 02-505, 02-506, 02-507, 02-508, 02

Some evidence used to obfuscate the other findings may be used to support the finding of harm, but the conclusion does not flow rationally because the previous groups have been sampled. 770 S.W. 2d, 276 Ga. App. 437, 44 (1985); 770 S.W. 2d, 333 Ga. App. 438, 439 (1985).

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