Supreme Court No. 98003-9

SUPREME COURT OF THE STATE OF WASHINGTON

IN RE THE DEPENDENCY OF Z.J.G. AND M.G., Minors

WASHINGTON STATE DEPARTMENT OF CHILDREN, YOUTH AND FAMILIES,

Respondent,

v.

SCOTT JAMES GREER

Appellant.

ON APPEAL FROM THE SUPERIOR COURT OF THE STATE OF WASHINGTON FOR KING COUNTY

The Honorable Patrick Oishi, Judge

***AMICUS* BRIEF IN SUPPORT OF APPELLANT SCOTT JAMES GREER'S PETITION FOR REVIEW**

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IDENTITY AND INTERESTS OF *AMICUS CURIAE*

Amicus Margaret Jacobs is the Chancellor's Professor of History at the University of Nebraska-Lincoln. Her book, *White Mother to a Dark Race*, compared government policies and practices of Indigenous child removal and institutionalization in the United States and Australia from 1880 to 1940 and won the American historical profession's most prestigious prize, the Bancroft Prize from Columbia University, in 2010. In 2014, Dr. Jacobs published *A Generation Removed: The Fostering and Adoption of Indigenous Children in the Postwar World*, which analyzes how government policy shifted away from institutionalization and toward removing Indigenous children for placement in non-Indigenous families in the United States, Australia, and Canada. That book also studies the history of the social movement that led to the passage of the Indian Child Welfare Act ("ICWA") of 1978.

Amicus has a strong interest in explaining the historical injustices that led to adoption of ICWA and how the Act's provisions grew out of American Indian experience of family separation. Based on her historical study, amicus wishes to show that failure to abide by ICWA's notice provision and statutorily mandated deference to tribes on questions of tribal affiliation undermines the Act's protections for Indian children, families, and tribes.

STATEMENT OF THE CASE

Amicus Margaret Jacobs adopts and incorporates the Statement of the Case in Appellant's brief.

SUMMARY OF ARGUMENT

Determining whether a child is an enrolled member of a tribe – or is eligible for enrollment – is an essential threshold inquiry necessary for ICWA to work as Congress intended to protect Indian children, families, and tribes. ICWA's drafters included a formal tribal notice provision in the law, triggered any time there is "reason to know" a child may be an Indian child, to ensure that federally-recognized tribes, not states, would determine whether a child qualified as a member of its nation. If state social service agencies and courts do not adhere rigorously and faithfully to ICWA's formal tribal notice provision, the law cannot function as intended.

In the decade before ICWA, states were separating, on average, up to 35% of all Indian children from their families, often without legitimate cause, and placing them far from their tribal communities. This separation harmed the children who were removed from their families, destroyed families, and decimated tribes. The systematic, widespread removal of Indian children means that today there are many thousands of people without knowledge of tribal affiliation. ICWA addresses this problem of disassociation by requiring formal notice to tribes whenever there is a "reason to know" that a child may be an Indian child. The decision below undermines tribal sovereignty and ICWA's protections by making states

arbiters of Indian child status and requiring proof of such status before triggering ICWA's protections, including tribal notice.

A. AMERICA'S LONG HISTORY OF INDIAN CHILD REMOVAL.

American Indian child removal has a centuries-long history and an ongoing legacy. Dating back to the 1600's, settlers removed Indian children from their families to labor in settler households and to discipline and punish Indian communities who resisted colonization.[1] Starting in the late 1800's, government officials forced Indian children to attend distant boarding schools as a means to sever children's ties to their families, tribes, and homelands, and to assimilate children into the mainstream.[2] By 1900, approximately 79% of all Indian school children attended such boarding schools, of which there were an estimated 153 with an enrollment numbering almost 21,000.[3] Such removals traumatized children and families, alienated many Indian children from their heritage,

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[1] CHRISTINE M. DELUCIA, MEMORY LANDS: KING PHILIP'S WAR AND THE PLACE OF VIOLENCE IN THE NORTHEAST (2018); TOMÁS ALMAGUER, RACIAL FAULT LINES: THE HISTORICAL ORIGINS OF WHITE SUPREMACY IN CALIFORNIA (2008); DAWN PETERSON, INDIANS IN THE FAMILY: ADOPTION AND THE POLITICS OF ANTEBELLUM EXPANSION (2017).

[2] DAVID WALLACE ADAMS, EDUCATION FOR EXTINCTION: AMERICAN INDIANS AND THE BOARDING SCHOOL EXPERIENCE, 1875-1928 (1995).

[3] United States, Office of Indian Affairs, *Statistics as to Indian Schools*, Annual Report of the Commissioner of Indian Affairs for the year 1900, 626-635 (1900), available at http://digicoll.library.wisc.edu/cgi-bin/History/History-idx?type=article&did=History.AnnRep1900p1.i0041&id=History.AnnRep1900p1&isize=M, last accessed February 17, 2020.

and undermined Indian communities and cultures.[4]

In the post-World War II period, the U.S. Congress mandated an aggressive assimilationist approach to Indian affairs that included efforts to terminate the unique tribal status of Indian people and relocate Indian people to urban areas.[5] The cumulative effect of these new federal policies was to exacerbate Indian poverty and cut Indian families off from tribal and federal sources of support.[6] Federal and state governments also advanced policies that actively promoted adoption of Indian children by non-Indian families.[7] By the late 1950's, the BIA, in concert with the

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[4] MARGARET JACOBS, WHITE MOTHER TO A DARK RACE: SETTLER COLONIALISM, MATERNALISM, AND THE REMOVAL OF INDIGENOUS CHILDREN IN THE AMERICAN WEST AND AUSTRALIA, 1880-1940 (2009).

[5] ROBERTA ULRICH, AMERICAN INDIAN NATIONS FROM TERMINATION TO RESTORATION, 1953-2006 (2010); CHARLES WILKINSON, BLOOD STRUGGLE: THE RISE OF MODERN INDIAN NATIONS, 57-86 (2005); DONALD L. FIXICO, TERMINATION AND RELOCATION: FEDERAL INDIAN POLICY, 1945–1960, 91-110, 183 (1986); U.S. Dep't of the Interior, *Annual Report of the Commissioner of Indian Affairs* (hereafter "Annual Report of Indian Affairs"), 241 (1954).

[6] Wilkinson, BLOOD STRUGGLE, at 81 ("every terminated tribe floundered. Members of the smaller tribes . . . got a few hundred dollars apiece for their sold-off land and migrated to the cities or lived in shantytowns near their former reservations.").

[7] *Annual Report of Indian Affairs* (1954), 239; (1955), 245; (1957), 251 (Welfare Branch personnel frequently stated that they wanted to prevent Indian family "breakdown" and "disintegration."); Letter from Aleta Brownlee to Chief, Welfare Branch, April 8, 1955, Box 1, Folder: General, July 1954 – June 1955, Division of Social Services, Records of the Bureau of Indian Affairs (BIA), Record Group 75, National Archives and Records Administration, Washington, D.C. (BIA social workers also sought to "improv[e] the quality of family life by helping parents and children in their relationships with each other."); Department of Public Welfare, "Child Welfare Services – Indian Children," March 15, 1957, Box 120, Folder: "Indian Committee, 1957-1964," 3; United Way of Minnesota papers, SW 070, Social Welfare History Archives, Special Collections, University of Minnesota Libraries, Minneapolis.

Child Welfare League of America, had devised a program to promote the inter-state adoption of Indian children by non-Indian families: the Indian Adoption Project.[8] At the same time, many state social services departments promoted the adoption of Indian children by non-Indian families.[9]

As a result of these developments, by the late 1960's, Indian children had become vastly over-represented in state child welfare systems. The Association on American Indian Affairs estimated that 25-35% of all Indian children were living apart from their families in the decade before Congress passed ICWA.[10]

During Congressional hearings on ICWA in the 1970's, the trauma

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[8] Arnold Lyslo, *Adoptive Placement of American Indian Children with Non-Indian Families, Part 1:The Indian Project*, Child Welfare Vol. 40, no. 5, at 4-6 (May 1961).

[9] Arnold Lyslo, *Progress Report of the IAP* (May 14, 1963); Box 17, Folder 4; Child Welfare League of America papers, Social Welfare History Archives, Special Collections, University of Minnesota Libraries, Minneapolis (noting that in Alaska, Montana, and Arizona, in-state Indian adoptions had doubled between 1960 and 1963); Memo from Rovin to Commissioner, July 22, 1958, Box 3, Folder: General, July 1957 – December, 1959, Division of Social Services, Records of the Bureau of Indian Affairs (BIA), Record Group 75, National Archives and Records Administration, Washington, D.C. ("This could in future years reduce the expenditures of the Bureau for foster home care since we are now paying for care for a number of children for whom adoption should be possible.")

[10] In the mid-1970's, the Association on American Indian Affairs conducted a comprehensive survey of Indian child placements in nineteen states with large Indian populations. *See* Steven Unger, *The Indian Child Welfare Act of 1978: A Case Study*, 75-76 (PhD diss, University of Southern California, 2004). These statistics were eventually included in Appendix G, "Indian Child Welfare Statistical Survey," July 1976, in U.S. Senate Select Committee on Indian Affairs, 95th Congress, 1st Session. *Hearing before the United States Select Committee on Indian Affairs on S. 1214*, August 4, 1977.

and abuse suffered by Indian children, families, and tribes as a result of removal was recounted in harrowing detail by Indian social workers, tribal leaders, and Indian women who had either experienced removal or the loss of their own children.[11] Non-Indian advocates, psychologists, and lawyers who had worked closely with Indian families corroborated their accounts. A consistent theme of hearing testimony was that Indian tribes were desirous and capable of taking care of their own children, but that state policies had robbed them of jurisdiction over their own nation's children. Witnesses described the extensive protections, services and care extended to Indian children by tribes, including foster services.[12] The hearings made clear, however, that there were many Indian children living off-reservation who lacked the protections and services of their tribes, because they had been swept up into their state child welfare systems—often wrongfully

[11] *Problems that American Indian Families Face in Raising their Children and How these Problems are Affected by Federal Action or Inaction: Hearing before the U.S. Senate Committee on Interior and Insular Affairs, Subcommittee on Indian Affairs, 93rd Congress, Sess. 2, April 8 and 9, 1974* (1975) (hereafter "Senate, 1974"); U.S. Senate Select Committee on Indian Affairs, 95th Congress, 1st Session. *Hearing before the United States Senate Committee on Indian Affairs on S. 1214*, *93th Congress, Sess. 2* (1977) (hereafter "Senate, 1977"); *Hearing on Indian Child Welfare Act of 1978 (S. 1214) Before the U.S. House of Representatives, Committee on Interior and Insular Affairs, Subcommittee on Indian Affairs and Public Lands, 95th Congress, Sess. 2*, *February 9 and March 9, 1978* (Serial No. 96-42) (1981).

[12] For example, Mel Tonasket described the importance of community and the foster services and other resources for families developed by tribes, (Senate, 1974, 225-226). And Goldie Denny, Director of Social Services for the Quinault Indian Nation, testified that the Quinault tribe had developed a child welfare system that, relative to the state and county systems, reduced duration of foster care placement and greatly increased the rate of family reunification. (Senate, 1977, 79-80).

and without basis. Many Indian women testified about the intense pressure they experienced to give up their children for adoption.[13] One witness described having one of her children taken away while at a babysitter, and a second child being removed at four months old after she unknowingly signed papers relinquishing custody after months of refusing to entertain the notion of adoption. Witnesses also testified that authorities often removed Indian children from their families for reasons other than neglect and abuse, including lack of indoor plumbing; crowded housing; children sharing beds; and children being cared for by extended family members.[14] tribal leaders corroborated the testimony that Indian children were being removed without cause or warning.[15] Tribal members also testified to the poor outcomes that many of their children experienced in non-Indian homes, including sexual abuse and impregnation.[16]

B. TRIBES ARE THE ONLY AUTHORITATIVE SOURCE OF TRIBAL AFFILILATION.

A century of Indian child removal on the part of the federal government and state social service agencies had dire consequences.

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[13] Senate, 1977 (79-80).

[14] Senate, 1977, 77 (testimony of Goldie Denny that she and her sister were removed from their family home after they were found barefoot in the street, wading in mud puddles.

[15] Senate, 1977 (224).

[16] Senate, 1977 (122).

Among them, many children who grew up in institutions or as foster children or adoptees in non-Indian families knew little or nothing about their families of origin or their tribal heritage. Thus, still today, there are thousands and thousands of people of Indian descent, and their children, who are eligible for membership in a tribal nation, but who lack affiliation because of prior policies of family separation. Moreover, it has often been difficult for tribal members and their descendants to maintain their ties to their tribal communities when they were relocated to urban areas and/or their tribes were terminated by the federal government. (It took decades for tribes to regain federal recognition.)

ICWA's architects designed the law to help Indian families and tribes reclaim the care of their children after a century of Indian child removal. Drafters of the law realized that determining who qualified as an Indian child could be challenging, so they created a tribal notice provision in the law to ensure that tribes would be recognized as the authoritative source of a child's eligibility for membership. ICWA's tribal notice requirement is triggered whenever there is "reason to know" a child may be an Indian child.[17] It would defeat ICWA's purpose if states could evade this requirement and decide for themselves whether a child was an Indian,

[17] *See* 25 U.S.C. § 1912(a); RCW 13.38.070.

rather than defer to tribes, as Congress intended and as is necessary to effect ICWA's protections, given the lasting impact of America's Indian child removal policies.

Since ICWA's passage in 1978, there have been many failed attempts by judges and lawmakers to make states, rather than tribes, the arbiters of Indian child status. In the 1990's, for example, legislators sought to amend the statute to eliminate its protections for children of parents who do not have an active affiliation with a tribe. Judges hostile to ICWA had embraced this logic in adopting the "Indian family exception" to evade its protections for Indian children who had been adopted by non-Indians at birth, or otherwise had been deprived of being part of an existing Indian family. The so-called Pryce exception would have gutted ICWA by codifying this exception and making the law's protections inapplicable to "a child whose parents do not maintain affiliation with their Indian tribe."[18] Tribal representatives bitterly opposed the amendment, arguing Indian heritage is an issue of culture, not geography, and that courts were not qualified to make such a determination. Opponents also observed the exception was at odds with tribal self-

[18] Title III, HR 3286, 104th Congress, 2nd session, 15-17, available at http://www.multiracial.com/government/hr3286.pdf, last accessed February 17, 2020; *Senate Hearing to Amend ICWA*, 14 (1996).

determination, the doctrine that each Indian tribe has its own criteria for membership and is the sole authority on the issue of whether a child is eligible for membership.[19]

As ICWA allies argued in opposing the Pryce Amendment, the amendment would have penalized the very Indians who had been victims of dislocation and removal. The amendment also would have disqualified from ICWA's protection the children of those very Indian people who had been separated as children from their families and communities before ICWA. [20] The Pryce Amendment was soundly defeated in 1996 and the Existing Indian Family Exception has been rejected by state courts and legislators in at least 24 states.[21]

Like the Pryce Amendment, the lower court's decision in this case is inconsistent with tribal sovereignty and risks putting the statute's protections beyond the reach of Indian people who, because of state-mandated separation and removal, lack knowledge of tribal affiliation.

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[19] *Hearing Before the U.S. Senate Committee on Indian Affairs on Amendments to the Indian Child Welfare Act and To Provide Constructive Dialog on How to Improve the Indian Child Welfare Act, 104th Congress, Sess. 2, June 26, 1996*, 53 (1996).

[20] *Hearing Before the U.S. Senate Committee on Indian Affairs on Amendments to the Indian Child Welfare Act and To Provide Constructive Dialog on How to Improve the Indian Child Welfare Act*, 104th Congress, Sess. 2, June 26, 1996, 262 (1996).

[21] Native American Rights Fund Indian Law Library, *ICWA Guide Online*, Section 1.3, available at https://narf.org/nill/documents/icwa/faq/application.html#3, last accessed February 17, 2020.

Even after ICWA was enacted, Washington state often failed to comply with its notice provision. A 1990 investigation found that state social workers were not properly identifying Indian children and were failing to provide notice to tribes. "The consistent failure to answer this threshold question [of the child's tribal affiliation] placed all other requirements of the federal law in jeopardy of being ignored, at best, or conscientiously avoided, at worst," the report stated.[22] The facts of this case demonstrate that state actors – even presumably well-meaning social service personnel – remain unreliable arbiters of Indian child status. By failing to invoke ICWA's protections and defer to tribes when there is "reason to know" that a child is an Indian child, the decision below threatens to undermine tribal sovereignty and ICWA's protections.

CONCLUSION

Congress was moved to pass ICWA after hearing testimony from so many Indian witnesses who had experienced firsthand the ways in which heavy-handed efforts by state social welfare authorities had hurt Indian children, families, and tribes. The protections afforded ICWA are meaningless without strict adherence to its provisions.

[22] *State Failing to Meet Indian Child Services*, YAKAMA NATION REVIEW BOL. 22, NO. 8, Aug. 17, 1990, at 1 and 6.

Respectfully submitted this 18th day of February, 2020.

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CERTIFICATE OF SERVICE

The undersigned certifies under the penalty of perjury under the laws of the State of Washington that on the below date, the original documents to which this Declaration is affixed/attached, was filed in the Supreme Court of the State of Washington, under Case No. 98003-9, and a true copy was e-mailed or otherwise caused to be delivered to the following attorneys or party/parties of record at the e-mail addresses as listed below:

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3. Jennifer Masako Yogi and Sarracina Littlebird, Northwest Justice Project, Jennifery@nwjustice.org; and cina.littlebird@nwjustice.org.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 18th day of February, 2020.

s/ Colleen Broberg
COLLEEN BROBERG
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SUMMIT LAW GROUP

February 18, 2020 - 4:32 PM

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