IN THE SUPREME COURT OF THE STATE OF KANSAS

Oct 3 4 05 PM '91

Administrative Order No. 82

Re: CASA Standards and Guidelines

CARCL O. GREEN CLERK APPELLATE COURTS

In implementation of Supreme Court Rule 110, the attached revised Standards and Guidelines for Court Appointed Special Advocate (CASA) Programs are hereby adopted effective this date.

The revised Standards and Guidelines supersede those adopted by Administrative Order No. 55, dated February 19, 1987, which is hereby rescinded.

CASA programs currently certified pursuant to Supreme Court Rule 110(c) under the previous Standards and Guidelines are hereby granted extended certification, which will remain in effect during calendar year 1992. New CASA programs shall be subject to certification by the Judicial Administrator under the revised Standards adopted by this order.

BY ORDER OF THE COURT this

day of October 1991.

RICHARD W/HOLMES

Chief Justice

STANDARDS AND GUIDELINES

FOR

KANSAS

COURT APPOINTED SPECIAL ADVOCATE (CASA) PROGRAMS

Supreme Court Task Force on Permanency Planning
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First adopted 1987 Revised October 1991

STANDARDS FOR KANSAS CASA PROGRAMS

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STANDARDS FOR KANSAS CASA PROGRAMS

I. CERTIFICATION OF CASA VOLUNTEERS

- A. Each program shall certify its volunteers. Certification shall include the following:
 - 1. Screening procedures
 - Training requirements (See Section II of these standards.)
- B. At a minimum, program directors shall conduct the following screening procedures and give appropriate consideration to the information obtained:
 - Written application completed by volunteer applicant containing, at a minimum, information pertaining to:
 - a. Educational background
 - b. Employment history
 - c. Personal experience with child abuse & neglect
 - 2. Three written references from persons unrelated to the applicant
 - 3. Personal interview
 - 4. Child abuse registry and KBI national criminal record checks
- C. The prospective volunteer shall be informed, in writing, of the screening procedures which will be used, and must sign a release of information for the purpose of child abuse registry checks and the KBI national criminal record check. Applicants who refuse to sign the release shall not be certified as CASA volunteers.
- D. The Office of Judicial Administration (OJA) shall designate a local court employee to conduct the KBI screening procedures. If that is not possible, a member of the OJA staff shall conduct the screening procedures.
 - 1. The local court employee or OJA will furnish written notification to the program of whether an applicant has received clearance after being screened. Only applicants who pass the screening procedures (or are granted an exception by the local judge) may be certified as CASA volunteers.

- 2. Program directors shall make appropriate written inquiries to the applicant regarding any prior contact with juvenile justice or criminal justice systems in this and other states and shall furnish the information obtained to the local court employee or OJA for consideration in screening applicants.
- 3. Program directors shall provide information to the local court employee or OJA as follows:
 - a. Full name of volunteer applicant and any AKA's known to the program
 - b. Social Security number
 - c. Birthdate
 - d. Height, weight, color of hair, color of eyes
 - e. Street address, city, and state of residence for the five years prior to application
 - f. Race
- 4. The local court employee or OJA will screen the applicant through a KBI criminal record check, and certification of the volunteer generally cannot proceed if any of the following is found to apply to the applicant: (If any exception is to be made, the Administrative Judge or his/her designated judge must document, in writing, the justification for granting an exception.)
 - a. Has been convicted as an adult of any felony
 - b. Has been convicted as an adult of any misdemeanor which is a sex offense, a crime against public morals, a crime affecting family relationships and children, assault, battery, or an attempt or conspiracy to commit any such misdemeanor (as defined in K.S.A. Chapter 21, articles 33, 34, 35, 36 and 43 and amendments.)
 - c. Has been adjudicated a juvenile offender because of having committed an act, which if done by an adult, would constitute the commission of a felony.
 - d. Has been adjudicated a juvenile offender because of having committed an act which, if done by an adult would constitute a misdemeanor which is a sex offense, a crime against public morals, a crime

affecting family relationships and children, assault or battery, or an attempt or conspiracy to commit any such misdemeanor (as defined in K.S.A. Chapter 21, articles 33, 34, 35, 36 and 43 and amendments.).

- e. Has entered into a diversion agreement involving a charge of child abuse or a sexual offense (K.S.A. 22-2906 et seq. and amendments, K.S.A. 38-1635).
- The local program director shall ensure that 5. the volunteer is screened through the SRS Child Abuse Registry and will make inquiries of the registries of other states where the applicant has lived in the last five years and will generally disallow certification if it is found that SRS or a similar agency in another state lists the applicant as the perpetrator of an act of child abuse or child neglect. exception is to be made, the Administrative Judge or his/her designated judge must document in writing the justification for granting an exception. Certification will not be denied if the registry of another state refuses to give information in a timely manner. disqualifying documentation is obtained after certification is granted, decertification should be undertaken.
- 6. Anyone who is found to have charges pending for offenses listed in D4 above will not be cleared unless and until the charges have been dismissed or the individual is found not guilty in a court of law. The program will be notified in writing that a decision on clearance is suspended pending the outcome of the applicant's court case.
- 7. The local court employee or OJA will ensure the timely processing of volunteer applications.
- 8. The program may continue to screen an applicant during the training process until certification is granted.
- E. Written records on each prospective volunteer covering all screening procedures employed by the program will be maintained in the program office. The notification of clearance/non-clearance by the local court employee or OJA will be kept on file in the program office. Program directors will send a list of the newly certified volunteers to OJA within

30 days after training and screening procedures are completed. (See Appendix Form A.) As volunteers resign or are terminated, program directors will notify OJA. (See Appendix Form B.)

II. TRAINING OF CASA VOLUNTEERS

- A. All volunteers must participate in a minimum of fifteen (15) hours of training prior to being assigned to a case. Credit (towards the 15-hour minimum) may not be given for training obtained by a volunteer prior to application to the CASA program.
- B. The CASA program training curriculum may include segments provided by other agencies or other CASA programs, where volunteers travel to other sites or agencies to participate with other trainees or professionals. However, at least four (4) hours of training must be specifically designed for presentation to the local CASA volunteers.
- C. At a minimum, pre-service training must cover the following topics:
 - 1. Roles & Responsibilities of CASA Volunteers (Purpose, Guidelines)
 - Confidentiality & Data Practices (Record Keeping)
 - 3. Cultural Awareness (Understanding Cultural Differences that Exist within your Community)
 - 4. Child Abuse & Neglect (Family & Child Dynamics)
 - Permanency Planning (Child Welfare System, Community Resources)
 - 6. Communication & Information Gathering (Report Writing, Interviewing Techniques)
 - 7. Juvenile Court Process (Kansas Laws, Operation of Local Court System)

- D. Pre-service training must cover the following topics if appropriate to the cases to be assigned:
 - 1. Dynamics of divorce, especially as they affect children
 - 2. Kansas laws pertaining to domestic relations
 - 3. Dynamics of rebellious or illegal behavior by juveniles
 - 4. Kansas laws pertaining to juvenile offenders.
- E. With local court approval, the training shall include an opportunity for volunteers to visit the court while it is in session to observe proceedings. This includes observing Foster Care Review Boards, where available.
- F. Trainees must be given a training manual which includes, as a minimum, the following:
 - Synopsis of pertinent Kansas laws (Child In Need of Care, Juvenile Offender, and Domestic Relations), and the regulations and policies of the CASA program.
 - 2. A "statement of commitment" or other form which clearly states the minimum expectations of the volunteer after being trained.
- G. The program shall provide or assist in the provision of a minimum of 10 hours of in-service training annually. Programs may establish volunteer in-service requirements.

HI. PROGRAM POLICIES GOVERNING ADMINISTRATION

A. A program shall keep complete case assignment records; up-to-date calendar of court hearings; and copies of all volunteer reports and correspondence regarding cases, including notes from phone or in-person consultations. Case files should be returned to the office when the volunteer is discharged or the case is closed. The file shall be destroyed when the child reaches 18 years of age if the case has been closed from the Court's jurisdiction for three years or more. Files of a child over the age of 18 shall be destroyed three years after the child is released from the jurisdiction of the Court.

- B. An annual written report will be compiled by February 15th of each year by the program to be distributed to the District Administrative Judge and the Office of Judicial Administration. At a minimum, the written report will include the following:
 - 1. Number of volunteers trained during the period of the report, and number of volunteers currently assigned to cases.
 - 2. Number of children served during the period of the report and the number of children served since the inception of the program.
 - 3. Specific types of cases handled (CINC, juvenile offender, domestic relations, etc.) during the period of the report and since the inception of the program.
 - 4. Ages of children served (at the time of case assignment) during the period of the report and since the inception of the program.
 - 5. Number of volunteer hours estimated during the period.
 - 6. Length of time a child is in foster care from the time a CASA volunteer is assigned to the case until a permanent placement is made.
 - 7. Budget information.
- C. To avoid a conflict of interest, the program shall not employ as paid staff any individual who concurrently supervises child in need of care or juvenile offender cases, either for the court or for SRS.
- D. The program shall ensure that an attorney is available for legal consultation with the CASA volunteer on any case where the program director deems it appropriate; provided that no attorney shall consult with the volunteer as to any case in which the attorney is serving in any capacity, or in any case in which there appears to be a conflict of interest.
- E. The program shall have written policies on the following and make these written policies available to the local court and the Supreme Court upon request:

- 1. The maximum number of cases which a volunteer may be assigned to at any one time. If that number is larger than three, a rationale must be attached.
- 2. The maximum number of volunteers to be supervised by each staff person. Consideration should be given to the exact number of hours each staff person spends in supervision (as opposed to administrative or other duties).
- F. The program shall have in effect written management, personnel and procedure policies.
- G. The program shall prepare annual, written budgets reflecting actual and projected income and expenses.

IV. PROGRAM POLICIES GOVERNING CASA VOLUNTEERS

- A. The CASA program director (or other staff person as delegated by the director) shall be responsible for all decisions regarding assignment/removal of specific volunteers to specific cases.
- B. To avoid a conflict of interest, no volunteer shall be certified if he/she is currently employed in the juvenile division of the district court or the youth services of SRS. No volunteer may be assigned to a specific case if she/he is connected to the family in a professional capacity or in a close personal relationship.
- C. There shall be written policies developed by the program that shall be approved by the administrative judge and provided to all volunteers to cover the following:
 - 1. Specific rules and policies pertaining to the gathering and release of information by a CASA, to include, as a minimum, the following:
 - a. Circumstances/conditions for questioning a parent if the parent has an attorney;
 - b. Situations in which an individual asks the CASA not to reveal information to anyone else;
 - c. Circumstances whereby a CASA must report suspected child abuse or neglect, and the procedure for making such reports;
 - d. Confidentiality of information and records which are collected by the volunteer as part of his/her duties.
 - Specific guidelines pertaining to activities in which the CASA may and may not engage as part of his/her duties.

- 3. Emergency procedures to cover situations affecting a child's welfare which come to the volunteer's attention at any time when the CASA office is not open.
- 4. Specific guidelines pertaining to inactive volunteer status.

V. CERTIFICATION OF THE PROGRAM

- A. The Office of Judicial Administration (OJA) will mail certification forms to each program by September 1st of each year in order to begin the annual certification process. The completed forms are to be returned to OJA by September 30th of each year.
 - 1. Any programs with active cases as of September 1 will be expected to be certified by January 1. Annual certification will be in effect from January 1 through December 31.
 - Before being appointed to a case, each new program must apply to OJA and be certified.
 - 3. For programs whose fiscal year is not January to December, materials and statistics provided shall cover the period from January to December.
- B. As part of the certification process, the Permanency Planning Coordinator in the Office of Judicial Administration must schedule a site visit to each program.
 - 1. The site visit must take place within sixty (60) days after the receipt of the completed certification forms and materials in the Office of Judicial Administration.
 - 2. The Coordinator will inform the program in writing if additional material will be required before or at the time of the site visit.
 - 3. The site visit will include one or more interview(s) which will be determined in advance after consulting with the program director. A list of those to be interviewed will be given to the program director in advance.
 - 4. The site visit may also include a random review of program records pertaining to CASA volunteers and their cases.

- C. The Coordinator will issue the preliminary written Certification Report to the program director within thirty (30) days after the completion of the site visit. Programs who disagree with the report or sections of it will have fifteen (15) days to discuss it with the Coordinator before it is finalized. The final Certification Report will be issued by the Coordinator within five (5) working days of the expiration of the fifteen (15) days discussion period. A copy of the final Certification Report will be sent to the designated judge(s) and the President of the Board of Directors of the sponsoring organization (if any).
 - 1. In the report, the Coordinator will rate each component of the program, as explained in Sections I through IV of these standards. The ratings to be used are as follows:
 - a. Meets standards
 - b. Meets standards with qualifications
 - c. Does not meet standards
 - 2. Any items which do not meet standards or which meet standards with qualifications will be explained in a narrative section. The explanation will include the tasks to be done in order to upgrade the rating.
 - 3. The program will be given forty-five (45) days to correct item(s) marked as not meeting standards on the final Certification Report. Written verification of changes must be submitted to the Coordinator within the forty-five (45) days. The Coordinator may schedule a second visit at his/her discretion.
 - 4. Items which meet standards with qualifications must be corrected by the program before the next certification cycle begins.
- D. After certification, if the Permanency Planning Coordinator determines that a program may be in non-compliance with the standards and any informal corrective action fails to correct the problem, the following shall happen:

- The Permanency Planning Coordinator and a certified CASA program director will schedule a site visit.
 - a. The Coordinator will inform the program, in writing, if additional materials, other than those required for certification, will be required before or at the time of the site visit.
 - b. The site visit may consist of interviews which will be determined in advance after consulting with the director of the program being visited. A list of those to be interviewed will be given to the program director in advance.
 - c. The site visit may also include a random review of program records pertaining to CASA volunteers and their cases.
- Following the site visit, the procedures as outlined in Section V, "Certification of the Program", part C will take effect.
- 3. The appeals procedure will be the same as the regular certification process as outlined in Section VI "Appeals Procedure."
- E. The Coordinator, as part of the certification process, will evaluate the program's utilization of the <u>Kansas CASA Guidelines</u> (See Appendix C).
 - 1. No report on the guidelines will be issued unless the judge or the program requests such a report in writing.
 - 2. If such a request is made, the report on the Guidelines will be issued separate from the Certification Report and will be used for consultation purposes only.
 - 3. The report will automatically be sent to both the program and the judge when it is complete, and will be issued as close as possible to the issue date of the Certification Report.
- F. OJA reserves the right to audit the program at any time.

VI. APPEALS PROCEDURE

- A. If a program is not granted annual certification or the annual certification is withdrawn, it may appeal the decision to the Supreme Court.
 - 1. The request for hearing must be in writing.
 - 2. The request must be mailed to the Supreme Court within forty-five (45) days after receipt of the final Certification Report.
- B. Appeals will be reviewed by a panel of three members, appointed by the Chief Justice of the Supreme Court.
 - 1. At least one member will be a program director of a certified CASA program.
 - 2. Panel members may not reside in the judicial district where the program being reviewed is located.
- C. The panel shall convene a hearing within 45 days at which the program director and the Permanency Planning Coordinator will be present.
 - 1. The judge who has contracted with the program shall be invited to attend or send a designee.
 - Any persons in attendance may present documentation, testimony, and/or witnesses at the hearing. In making such presentations, consideration should be given to time constraints.
 - 3. The panel shall prepare a report of its findings within two weeks.
 - 4. The findings of the panel will be advisory to the Supreme Court.
- D. If the panel recommends the denial or withdrawal of certification, it shall include in its report the conditions and timetable whereby it recommends that the program may reapply, if any.

APPENDIX FORM A (Part 1 of 2 parts)

CERTIFIED CASA VOLUNTEERS

Pursuant to CASA Standard I.E., this is written notification to the Office of Judicial Administration that volunteers have been screened, trained, and certified as CASAs.

Name of Program	
Judicial District	
volunteers listed on the at CASAs. A check () in each passed the screening proced has been made by an authori	, (date of last notification) the tached sheet have been certified as a column indicates that the volunteer dure listed. (If a written exception ized judge, no check will appear in or SRSbut the column "Written ave a check.)
Signature	Date
Title	_

Program Name:	Date Training Completed	Written Application	Three Written References	Personal Interview	Inquiry/Contact w/Justice System	KBI Criminal Record Check	Child Abuse Registry	No Pending Charges	Written Exception By Judge Other
Volunteer Name									
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APPENDIX FORM B

Decertified CASA Volunteers

Pursuant	to C	ASA	Stand	lard	I.E.,	th	is	is	wri	ltten	notio	e t	co	the
Office of	E Jud	icia	l Adn	ninis	trati	on	tha	t	the	follo	owing	vo]	Lun	teers
have resi	ianed	or	have	beer	term	iina	ited	:						

Name of Program		
Judicial District		
Signature	Date	
Title		

APPENDIX C

KANSAS CASA GUIDELINES

The following guidelines are offered to assist existing and developing programs. They are very flexible in order to allow local courts and program administrators to make decisions which will best suit their communities. It is assumed that the local judge(s) and the program will be in constant contact as decisions are made so that the CASA program will be truly reflective of the court's needs.

A. CASA PROGRAM STRUCTURE

 A CASA program should have an Advisory Board and/or Board of Directors representing a broad section of the community.

The purpose of the Board of Directors is to provide the program with financial security. As a program expands into training and assigning volunteers, a Board of Directors becomes a necessary tool for a well-managed program. It is helpful to assign board members committee assignments such as: fundraising, training, policies and procedures, budget, etc. The board should act in conjunction with the program director to maintain a program that will provide optimal representation of children.

Consultation and participation by local professionals and community leaders is essential to the development of a quality program. Often, programs choose to form an advisory board in order to formalize their relationship with key individuals, and such a board is highly recommended. The kinds of expertise which programs have found helpful are as follows:

- pediatrics, child development, mental health, dynamics of abusive/neglectful families, child abuse/neglect treatment
- accounting/budgeting
- nonprofit management
- personnel
- fundraising
- public relations/marketing
- media relations
- courts
- SRS liaison
- CASA volunteers
- legislative issues
- other child service agencies
- community and business leaders
- The primary focus of a CASA program should be serving abused and neglected children in juvenile dependency proceedings.

- 3. The CASA program should have written goals and objectives, measures for obtaining those goals and objectives, and a methodology for monitoring and evaluating progress. The program's budget and financial goals should be based upon these objectives.
- 4. A CASA program should have a written organizational plan including job descriptions for staff and volunteers; volunteer recruiting plan; screening and training procedures; program policies and procedures; guidelines for support and supervision of volunteers; guidelines for record keeping and data collection; and a funding plan.
- 5. In addition to the program director, CASA programs should have adequate supervisory and support staff to ensure timely and thorough case management. A recommended volunteer/supervisor ratio is 30/1.
- A CASA program should have a written media/public relations policy.
- 7. A CASA program should be recognized and supported by the court.
- 8. A CASA program should have local policies in keeping with the Kansas Supreme Court CASA standards.
- 9. A CASA program should be affiliated with the Kansas CASA Association.
- 10. A CASA program should be a program member of the National CASA Association.

B. ROLES AND RESPONSIBILITIES OF A CASA VOLUNTEER

1. A CASA volunteer should:

- a. Maintain complete written records about the case, including appointments, interviews and information gathered about the child(ren);
- b. Report any incidents of child abuse or neglect to the CASA supervisor and appropriate authorities;
- c. Interview parties involved in the case, including the child(ren);
- d. Determine if a permanent plan has been created for the child(ren), and whether appropriate services, including reasonable efforts, are being provided to the child(ren) and family;

- e. Assure that the child(ren)'s best interests are being represented at every stage of the case, attend court hearings, and make a written recommendation to the court on what decision is best for the child(ren).
- f. Monitor the case by visiting the child(ren) as often as necessary to observe whether the child(ren)'s essential needs are being met, and whether the judge's orders are being carried out;
- g. Participate in any planning or treatment team meetings involving the child(ren) in order to be kept informed of the child(ren)'s permanent plan; and
- h. Remain actively involved in the case until formally discharged by the court.
- 2. A CASA volunteer should not become inappropriately involved in the case by providing direct service delivery to any parties that could (a) lead to a conflict of interest or liability problems; or (b) cause a child or family to become dependent on the CASA volunteer for services that should be provided by other agencies or organizations. Examples of inappropriate volunteer practices are:
 - Taking a child home or sheltering a child in the home;
 - Giving legal advice or therapeutic counseling;
 - Making placement arrangements for a child; or
 - Giving money or expensive gifts to a child or family.
- 3. A CASA volunteer should respect the relationship between placement providers, such as foster parents, and the child. If the provider and the CASA should disagree about the care that is being provided to the child, the volunteer should try to discuss the situation with the provider if at all possible. If the disagreement continues, the CASA volunteer should follow the proper procedure in reporting the situation to the provider's agency. Only when the disagreement has been through the proper channels and failed to be resolved, should the CASA volunteer ask the Court to intervene.
- 4. A CASA volunteer should only transport a child when there is liability insurance coverage for such an activity and the program allows. The volunteer should also have permission of the person or agency which holds custody before transporting a child.

C. RECRUITING

1. A CASA program should produce a standardized packet of information (brochure, information kit), to clearly explain

the purpose of CASA, define the role and responsibilities of the CASA volunteer and explain the minimal commitment of time required.

- 2. The recruitment effort should be targeted to attract male and female volunteers from diverse cultural and ethnic backgrounds; and from a variety of age groups and socio-economic levels.
- 3. The recruitment effort should be targeted to include some individuals who are able to work effectively with children who have special needs such as hearing, sight, or speech impairment; developmental disability; physical or mental disability; or any other condition requiring special skills for communication or advocacy.
- 4. The recruitment plan should be designed to make the public aware of the problems faced by abused and neglected children who enter the courts.
- 5. As part of its recruiting procedure, a CASA program should refer potential volunteers to other CASA programs if the potential volunteer lives outside the program's service area.
- The recruiting efforts should include media outreach and speaking engagements.

D. SELECTION AND APPOINTMENTS OF VOLUNTEERS

- CASA programs should notify all applicants in writing of the status of their application. The selection procedure should ensure that those not selected are treated with dignity, respect and, if possible, referred to alternative volunteer opportunities more suitable for them.
- The judge should determine which cases are referred to the CASA program, and all appointments and assignments should be made by an appropriate order of the court.
- 3. CASA volunteers should be sworn in by the presiding judge.
- 4. CASA volunteers should be assigned at the earliest stages of the court proceedings, in accordance with Recommendation #15 from the Metropolitan Judges Committee Report of the National Council of Juvenile & Family Court Judges, "Deprived Children: A Judicial Response, 73 Recommendations".
- 5. CASA volunteers should not be assigned more than two or three cases simultaneously; the number of cases assigned

should be high enough to maintain the interest of the volunteer and low enough to ensure quality work and to avoid volunteer burnout.

- 6. CASA programs should be conscious of ethnic, cultural, and religious diversity when appointing volunteers to cases, and select volunteers based on experience, understanding and skills to deal with these considerations.
- CASA programs and/or the court should notify all parties and agencies involved in the case of the CASA volunteer's appointment.
- 8. CASA volunteers should have complete and immediate access to all records and documents pertaining to the case.

E. SUPERVISION OF VOLUNTEERS

- CASA program staff should be easily accessible and make every effort to provide quick and thorough guidance to the CASA volunteer when he or she is assigned to a case.
- 2. The CASA program supervisor should hold regularly scheduled case conferences with the volunteer to review progress of the case.
- 3. CASA program supervisors should process the volunteer's report to the court and consider the volunteer's concerns and recommendations in a timely manner so as not to jeopardize the best interests of the child.
- 4. CASA volunteers should submit all recommendations concerning the case to the program supervisor in a signed, written report. CASA program supervisors should not alter the report without the consent of the CASA volunteer. If the supervisor disagrees with the volunteer's recommendation, an additional, second report should also be submitted to the court under the supervisor's signature.
- 5. The CASA program should have a clear policy to guide volunteers and program staff in the case of conflict regarding the case. The plan should include at least one level of appeal to another authority (i.e. Board Grievance Committee).
- 6. The CASA program should have a plan for the discharge or termination of a CASA volunteer by a designated authority. Appropriate grounds for dismissal include:
 - a. The volunteer takes action without program or court approval which endangers the child or is outside the role or powers of the CASA program.

- b. The volunteer violates a program policy, court rule or law.
- c. The volunteer demonstrates inability to effectively carry out CASA duties.
- d. The volunteer fails to complete required ongoing training.
- e. The volunteer falsifies volunteer application or misrepresents facts during the screening process.
- 7. The CASA program should evaluate all volunteers on an annual basis using a standardized evaluation form to review their performance and effectiveness. This should include an evaluation of the volunteer's work on the case, participation in ongoing training, and comments from the judge and/or juvenile court officers.
- 8. CASA programs should practice ongoing recognition of volunteers through written and verbal acknowledgment by judges and staff, in program newsletters, and in the media.