

June 28, 2021

Larry S. Royster
Clerk of the Court
Michigan Supreme Court
P.O. Box 30052
Lansing, MI 48909

RE: ADM File No. 2020-36 – Proposed Amendments of Rules 3.903, 3.966, 3.975, and 3.976 of the Michigan Court Rules

Dear Clerk Royster:

At its June 11, 2021 meeting, the Board of Commissioners of the State Bar of Michigan considered ADM File No. 2020-36. In its review, the Board considered a recommendation from the Access to Justice Policy Committee. The Board voted unanimously to support the proposed amendments.

The proposed amendments provide a clear process for court review of child placements in residential treatment programs with explicit standards that courts must consider when determining whether the initial or continuing placement is appropriate for that child.

Because the proposed amendments require courts to set forth their findings in relation to the child's placement in a written order, they may also facilitate better compliance with the Indian Child Welfare Act and Michigan Indian Family Preservation Act when a case is transferred to a tribal court.

We thank the Court for the opportunity to convey the Board's position.

Sincerely,



Janet K. Welch
Executive Director

cc: Anne Boomer, Administrative Counsel, Michigan Supreme Court
Robert J. Buchanan, President