



CHILD PROTECTION REGISTRY REFORM
informational document

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Part One: The Data

DCF, Family Services Division is the state agency responsible for carrying out the statutory mandate of Investigating complaints of neglect, abuse, or abandonment of children. In 2022:

- 19,725 reports were made to the Child Protection Line — 1,218 more than in 2021.
- At least 75% of the reports made were from mandated reporters and 18% from nonmandated reporters.
- Based on the 19,725 reports received, we opened 4,526 child safety interventions:
 - 2,386 investigations
 - 2,140 assessments:
 - 1,307 child abuse assessments
 - 833 family assessments
- At the conclusion of the 4,526 child safety interventions, 623 cases were opened for ongoing services.
- At the conclusion of the 2,386 investigations, **593 reports were substantiated**.
- Based on the 593 substantiated reports, there were 713 unique child victims.
- During the last quarter of 2022, there were:
 - 1,067 children in DCF custody
 - 487 children in the conditional custody of a parent, relative or other person known to the child and family
 - 197 families getting ongoing services after an investigation or assessment determined there was a high to very high-risk of future maltreatment.

The rest of this document will be dedicated to discussing options for those approximately 600 substantiated investigations annually, which result in individuals' names being placed on the child protection registry. For more general child protection data, please [click here for our annual Child Protection Report](#).

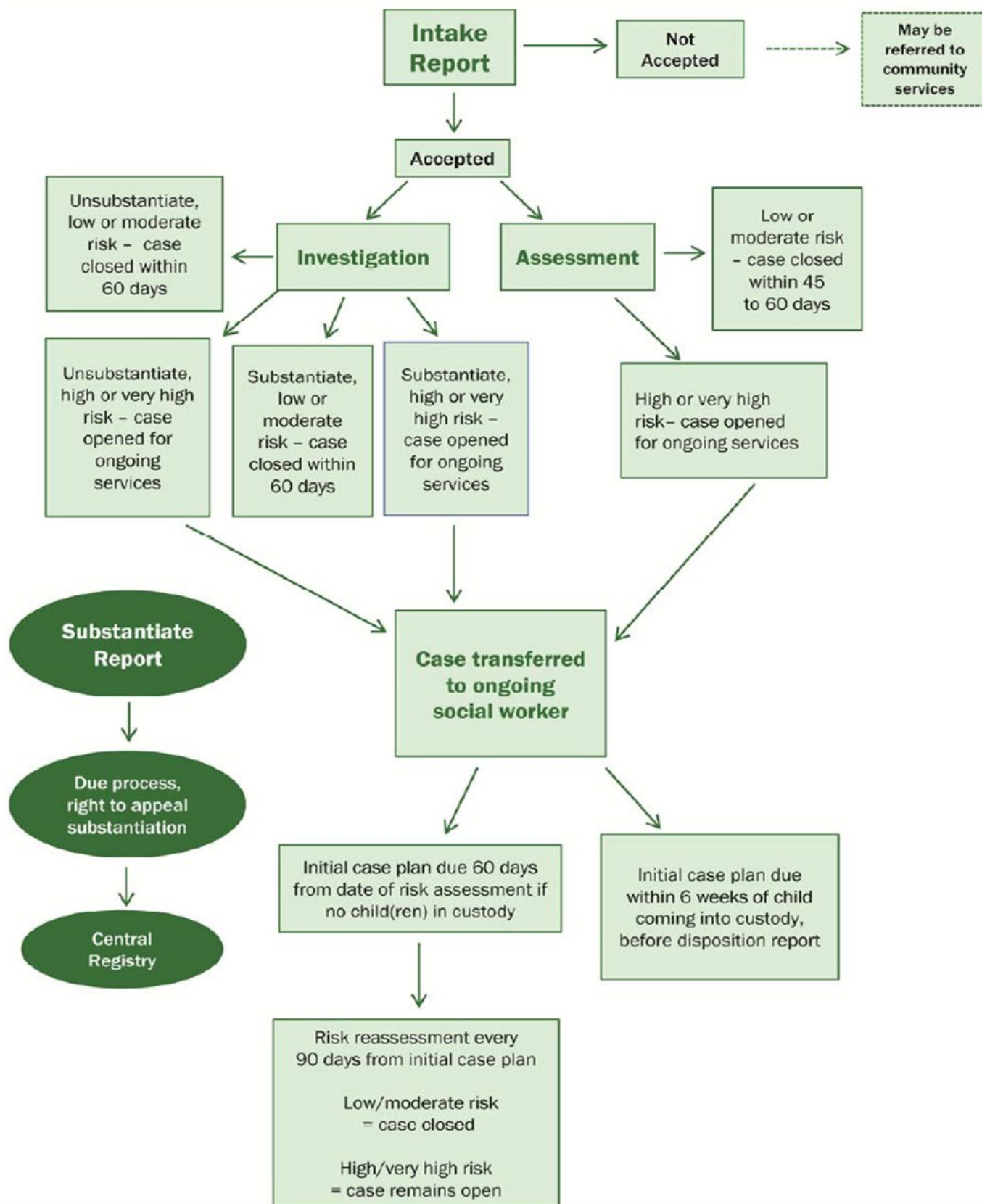
What is the child protection registry? It is a database of substantiated child abuse & neglect reports since January 1, 1992. When DCF investigates a report of child abuse or neglect, we must decide whether a reasonable person would believe that it happened. If the answer is YES, the report is substantiated.

For more information about what information is available on the child protection registry and how this record may affect someone, [click here](#).

There are currently approximately 25,000 registry records on Vermont Child Protection Registry. (This does not mean 25,000 individual names, as some individuals may have more than one substantiation.) In a state with a working-age population of just over 395,000 that is a little over 6%.

How does one become “substantiated”? When a call reading a concern of child abuse or neglect is made to the Vermont Child Protection Hotline (1-800-649-5285), that report is screened according to [statute](#) and [policy](#) and if accepted, will lead to a child safety intervention. Vermont employs a [differential response system](#) which means that some reports are accepted as [assessments](#) and some as [investigations](#). The major difference between the two is that with investigations, the department has a mandate to determine whether or not a reasonable person would believe that the incident of abuse or neglect occurred, and if so, that person's name is sent to the CRRU for name placement on the [child protection registry](#) and they are currently given, by statute, [14 days to request a review](#). What occurs during an investigation is complex and often driven by the type and seriousness of the allegation. For information related to what family's can expect during an investigation, [click here and look for Child Safety Interventions](#). For FSD policies that guide investigations and assessments, [click here and look for Child Safety Interventions](#). For Rules on [Response to Abuse and Neglect](#) For data related to substantiations, such as by abuser- child relationship, types of abuse, and age of child, please click here and look for [Data Based on Substantiated Reports 2014-2022](#)

FSD Case Flowchart



Why are we questioning our current policies, practices and statutes that govern the child protection registry?

First, *every child welfare system* operates under a continuous quality improvement framework. Our work and our practice is continually under review. We are always evolving; we are always improving. We know our work is never done.

Second, Vermont Parent Representation Center has now published two reports, both of which have called our collective attention to this matter. These reports and the information leading to them was the subject of discussions within the [Children's Justice Act Task Force](#) for much of the last three years. The Children's Justice Act Task Force (CJATF) is a federally mandated group, the function of which is to assess and make recommendations for system improvement in the realm of investigative, administrative, and judicial handling of cases of child abuse and neglect, and support designation and appropriation of CJA funding. CJATF is coordinated through DCF and membership is representative of the many disciplines and advocacy realms which make up our child welfare system, particularly that part of our system which deals with investigations of child abuse and neglect. This mission requires a spirit of collaboration and a positive working relationship between the Department for Children and Families (DCF) and the CJATF. Each year, the CJATF submits an annual report to our federal partners, which includes recommendations that are to be followed by DCF. In that fashion, this group serves as an advising body to the Department, to grantees receiving CJA grant dollars, and to the system as a whole. The on-going activities of the Task Force includes monitoring implementation of its recommendations and continuing interagency collaboration in carrying out the intent of the Act, and each year, DCF must submit a letter to the Administration for Children and Families assuring that the State has adopted or continues to progress in adopting recommendations of the Task Force (or a comparable alternative). For the past three years, the Task Force, or a subcommittee thereof has been looking closely at topics related to the child protection registry and formulating recommendations, some of which have been incorporated into these reform opportunities.

Third, Child welfare leaders and scholars across the nation are looking at the structural racism, socio-economic oppression, and implicit biases that have led to the disproportionalities in our child welfare systems across the country. Locally, Family Services Division is dedicated to these same explorations, and we have racial equity workgroups diving into things like accurate data collection, supporting BIPOC staff, and training and consultation for our child welfare professionals.

The time is right to look at the intersectionality between structural racism, socio-economic oppression, and child protection registries.

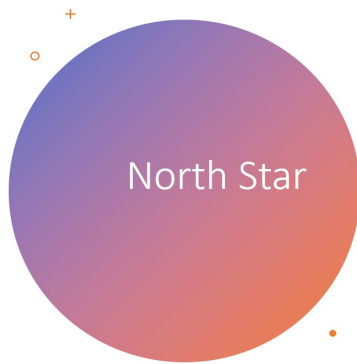
[Click here for podcast](#) from Vermont Child Welfare Training Partnership, for a series with transformational leader and founder of Mining for Gold, Corey Best, culminating in an interview with FSD Deputy Commissioner Aryka Radke.

[Click here for the article](#) Marginalizing Mothers: Child Maltreatment Registries, Statutory Schemes, and Reduced Opportunities for Employment

[Click here for a podcast interview](#) with the authors

But what about other issues, like kids entering custody?

While this will not be a topic that is presented during the child protection registry conversation, it is important that attendees are aware of other efforts underway. Alongside the work we have been doing to look at our child protection registry and racial equity work, we have also been looking closely at the numbers of children in custody and working diligently to improve the processes by which those decisions are made. As recently as September 15, 2023, we partnered with the Court Improvement Program to hold a [Child Welfare Summit](#), where we explored one set of recommendations from the 2021 legislatively commissioned report, **Drivers of Custody Rates in Vermont**. [Click here for the report and Policy briefs.](#)



We value child safety. We believe that most children are best protected and cared by their family.

We value opportunity for the children and families we serve. We strive not to limit opportunity and carefully consider the impacts of our involvement.

We want those we serve, children and their families, to be better off because we were involved in their lives.

Child Protection Registry data and research

33 V.S.A. § 4916 (a)(1) provides that the Commissioner (of DCF) “shall maintain a Child Protection Registry that shall contain a record of all investigations that have resulted in a substantiated report on or after January 1, 1992.” There are currently approximately **25,000 entries** on the child protection registry. This number does not represent individuals, as some people have been substantiated more than once.

33 V.S.A. § 4916 (b) provides that “A Registry record means an entry in the Child Protection Registry that consists of the name of an individual substantiated for child abuse or neglect, the date of the finding, the nature of the finding, and at least one other personal identifier, other than a name, listed in order to avoid the possibility of misidentification.”

Results provided to the employer show substantiation category and substantiation date. The data set below shows the number of registry checks that occur each year.

Important considerations

Child protection interventions are most often focused on the behaviors of the primary caretaker – most frequently mothers.

Child protection has historically been “mothercentric” and interventions/responses have focused heavily on “correcting” the behavior without deeply understanding or accounting for the systemic challenges at play.

Disproportionality in child welfare is widespread. Child welfare law and policy fails to account for the structural racism that limits access to resources and over captures parents who have fewer options.

Many of the people who are on the registry and barred from certain employment were never separated from their own children – they were deemed safe to care for their children but are not able to access jobs.

Child Protection Registry Checks Processed by CIES											
	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
On-Line Account	50,845	47,299	53,602	56,465	55,921	55,829	57,538	62,103	52,160	58,073	56,541
Paper Forms	not available	not available	Approx. 699	838	971	1,214	1,217	1,295	1,378	1,020	1,181
Total			54,301	57,303	56,892	57,043	58,755	63,398	53,538	59,093	57,722

What is the purpose of a substantiation?

- Substantiating someone for abuse/neglect *has little to no impact* on the immediate safety of the child in question.
- The *only* function served by substantiation is related to future child safety and ensuring those who should not have access to vulnerable individuals are prevented from having those opportunities.

The Child Protection Registry is an important tool to ensure safety in Vermont schools, daycares, hospitals, and other settings that serve children and vulnerable adults.

To be good stewards of public trust, we must always look at ourselves and our systems critically and honestly and be willing to acknowledge strengths and areas of weakness/limitation.

33 V.S.A. § 4911 (5) mandates the establishment of a tiered child protection registry *that balances the need to protect children and the potential employment consequences of a registry record for persons who are substantiated* for child abuse and neglect.

To try and understand what is happening in Vermont and how we compare with other states, we conducted a series of reviews:

- 33 cases where substantiations were overturned by the Commissioner's Registry Review Unit
- 104 Human Services Board review decisions regarding substantiations
- 41 states' substantiation processes and use of child protection registries including:
 - Standards of evidence
 - Functions for oversight
 - Assessment of risk
 - Automatic expungement

From these reviews, it became clear that a multi prong approach is needed to ensure that those individuals who are being placed on the child protection registry truly pose a risk to the community in the settings that the Registry is intended to serve. Some of those approaches include:

- **Instituting an internal and centralized layer of oversight and review for all substantiations**
- **Applying a secondary layer of consideration to substantiations prior to name placement**
- **Moving from the reasonable person standard to a preponderance of the evidence.**
- **Expansion of time frames for requesting and holding reviews**

What follows is some of the data, values, and recommendations behind these approaches. This content will be presented at the Child Protection Registry Stakeholder Conversation on Nov. 7th, and may be useful in conversations to come. This is not an exhaustive list, nor does it capture a full picture of all the data, every workgroup, or every facet of research and thinking, but it does, hopefully, provide us with a good place to start. These recommendations are not yet written in stone, and we want to hear your feedback. The conversation on Nov. 7th has been designed to invigorate deep thinking, thoughtful dialogue and perhaps serve as a jumping off point for more conversation, research, exploration and hopefully some agreements.

Part Two the Recommendations

Institute an internal and centralized layer of oversight and review for all substantiations

Currently, decisions to substantiate are made at the district level, between a supervisor and a worker. There is no layer of oversight by Division leadership. The Division is made up of 12 district offices, many of which have seen an unprecedented volume of turnover, in both the worker and supervisory positions. While the Division, in conjunction with the Child Welfare Training Partnership, is overhauling the foundational training which is mandatory for all newly hired staff, training is only one element needed for true quality assurance. The other elements are structure, oversight, and accountability.

Centralized substantiation determination review would be a new process by which the district offices would send all substantiations for review prior to a determination being rendered. Centralized review will create consistency across the state and will improve policy adherence, investigatory methods, and documentation, improving, over time, the knowledge, and skills of Family Service Workers. Child safety interventions are some of the most complex work done by the Division, the impacts of which are considerable for the children and families involved. Enhanced support around complex decision making is warranted given the highly consequential decisions being made.

Almost 15 years ago, the Division pivoted to centralized intake to accomplish these very goals. Centralizing the decision to place an individual's name on the Child Protection Registry is a logical next step towards ensuring these critical decisions which carry such great impact are made with uniform interpretation of statute and policy.

The centralized substantiation determination review process is a formal recommendation from the Children's Justice Act Task Force subcommittee on Child Protection Registry reforms.

What other states are doing:

- Most states report that the case determination decision lies with the worker and supervisor.
- 3 of the 41 require a higher level of internal review for substantiated cases (New Hampshire requires attorney review, Montana and Wyoming require district or regional manager).
- 1 of the 40 require a higher level of internal review for unsubstantiated cases (Massachusetts).
- 5 of the 40 states have required case reviews for certain types of cases involving certain injuries or with possible ramifications for the alleged perpetrator from a licensing standpoint (New Jersey, Florida, Kansas, Tennessee, Michigan).
- 25 of the states reported that the case determination decision sits at the worker/supervisor level with no higher level of review unless the decision is challenged or appealed.
- North Carolina reports that some counties in the state require attorney review prior to registry placement.
- Rhode Island reports that the case determination decision is made by the supervisor. However, if an appeal is requested, the case is reviewed internally by legal staff and the case can be overturned prior to proceeding to formal appeal.



Implementing an oversight structure such as this will require building support from the ground up. We have begun this journey by including supervisors in reviews of overturns, inviting workers to share their case determinations, encouraging a learning culture and the psychological safety needed for asking questions and receiving feedback, and sharing this recommendation out statewide with workers, supervisors and Division leadership.

Moving from the reasonable person standard to a preponderance of the evidence.

33 V.S.A. § 4916a(e) “The Department shall have the burden of proving that it has accurately and reliably concluded that a reasonable person would believe that the child has been abused or neglected by that person.”

National View – 33 states use preponderance of the evidence, 7 use a lower standard (most commonly reasonable person but some have novel definitions in their statute), 1 uses clear and convincing.

Questions and Considerations:

- What are the perceived and technical/ legal differences between ‘reasonable person’ and preponderance of the evidence’.
- Will this shift change the manner and nature of the administrative reviews?
- How is evidence obtained and weighed?
- What kind of training would be necessary for Vermont’s child welfare professionals?
- What bearing, if any, should the evidentiary standards of the Human Services Board hearings have on the substantiation determinations made by the Department?



Interesting point for consideration:

33 V.S.A. § 6906, which speaks to investigations regarding abuse of *vulnerable adults* indicates the following standard: The Department shall have the burden of proving that, based upon a preponderance of evidence, it concluded that a reasonable person would believe that the vulnerable adult has been abused, neglected, or exploited by that alleged perpetrator.

Vermont FSD Rule 2008

Making the Substantiation Decision

The decision to substantiate a report of child maltreatment shall be based on accurate and reliable information.

The decision shall be based on pertinent information gathered during an investigation. Hearsay information of a reliable type may be considered. All information shall be weighed with other supporting or conflicting data. A statement or disclosure from the child that he or she was abused or neglected is not required. In order to substantiate an allegation of child abuse or neglect, the division must determine that a reasonable person would conclude that: 1. The child is an abused or neglected child as defined in 33 V. S. A. 4912 and this rule; and, 2. unless the substantiated maltreatment is sexual abuse, a person responsible for the child's welfare is the perpetrator. When substantiating neglect or risk of harm, the steps taken by the individual to reduce or eliminate the neglect or risk of harm shall be taken into consideration in making the decision to substantiate.

[See Family Services Rules](#)

For details about how this rule is applied in practice, please see [FSD policy 56 substantiating child abuse and neglect](#)

Highlights from other states:

NEW YORK Effective January 1, 2022, all SCR (Statewide Central Register of Child Abuse and Maltreatment) reports registered and assigned to Child Protective Services (CPS) for investigation will be held to a new standard of evidence for a determination. The previous standard of evidence required to indicate a case of child abuse or neglect was “some credible evidence.” The new standard of evidence is “a fair preponderance of the evidence.”

“The truth is they just moved the standard already being applied in administrative reviews, fair hearings and family court to the forefront of the process,” said Julie Nichols, Administrative Caseworker for Monroe County Child Protective Services. Nichols oversees teams that investigate reports of neglect, maltreatment, and abuse as well as the team that trains new staff to do so. She added, “This change does not impact our ability to help families.”

SCR reform has been years in the making. One of the reasons for the reform is the attempt to address the issue of overrepresentation of low-income families and people of color in the system. “This reform also helps to provide clarity and consistency,” said Nichols, “in the levels of evidence necessary for decision-making processes in CPS work.”

<https://www.dorightbykids.org/what-does-the-new-cps-standard-of-evidence-mean/>

MINNESOTA In Family Investigations, a determination of whether maltreatment occurred is made. Determinations are made based on preponderance of evidence of the facts. A preponderance of evidence is defined as evidence in support of facts that is more convincing and has a greater probability of truth than evidence opposing the facts (51% or more). Facts are gathered from the following sources (not an exhaustive list):

- Interviews (child, adult and collateral sources)
- Physical evidence (photographs of injuries, weapons, other items collected by law enforcement)
- Records (medical, school, psychological)
- Other documentation.

INDIANA Credibility of Evidence: Credible evidence is evidence that is believable. Many factors affect the credibility of evidence. When making assessment findings, the credibility of each piece of evidence must be evaluated by considering factors such as, but not limited to:

1. A witness’s ability and opportunity to observe what he or she has claimed;
2. The manner and conduct of the witness while speaking;
3. Any interest, bias, or prejudice the witness may have;
4. Any relationship the witness may have with other interested parties;
5. The reasonableness of the witness’s testimony considered in the light of all the evidence heard;
6. Corroborating evidence: Information that supports someone’s prior statements or other evidence. Corroborating evidence makes the prior statement or other evidence it supports more credible than evidence that has not been verified or supported by independent sources;
7. Professional Sources - A witness may provide an opinion because of his or her knowledge, skill, experience, training, or education. In deciding how much weight to give a professional source opinion, you may also consider:
 - a. The witness’s skill, experience, knowledge, and familiarity with the facts of this case;
 - b. The reliability of the information supporting the witness’s opinions; and
 - c. The reasons for the opinions.
8. Children: When evaluating the credibility of a child’s statement, the FCM must take into consideration several factors, including, but not limited to the influence of adults (e.g., pressure or coercion). Typically, a detailed description of a complex chain of events is beyond the capabilities of a three (3) year old. However, young children are able to give plausible and specific descriptions of traumatic situations that would normally be beyond their experience (e.g., sexual acts) and such statements should be taken seriously.

Apply **Secondary Consideration of Factors Prior to Registry Placement**

In Vermont, Child Protection Registry placement is made if a reasonable person finds that the allegations occurred and meet the definition of child abuse or neglect. Except in certain cases of risk of harm where the Department can take into consideration efforts made by the caretaker to reduce risk, placement on the registry occurs if the fact pattern meets the definition of abuse or neglect.

Why change this?

- The Department is responsible for maintaining a registry that balances the protection of children and the employment consequences for those being substantiated – this can be very challenging and result in additional burdens on the people we are working to support and empower.
- Many of the people who are on the registry and barred from certain employment were never separated from their own children – they were deemed safe to care for their children but are not able to access jobs or chaperone school field trips.

What did we find out when we spoke to other states?

In 14 of the 41 states interviewed, a secondary level of consideration prior to registry placement is available or required.

We found five general categories of approaches:

Agency discretion – Typically this looks like a person in the chain of command looking at the case and making an independent judgment that the case should not be placed on the registry. These states seem to allow for discretion, but they don't seem to require it in every case. In these jurisdictions, they didn't seem to have any type of set guidance to govern this discretion. Arkansas, Kentucky, Louisiana, Montana and Oklahoma seem to fall into this category. Arkansas, Kentucky, Louisiana, and Montana have this sit with an individual or with a particular role. Oklahoma has a committee.

Structural approach – These jurisdictions seem to have different types of findings and depending on the finding, the case will or will not go onto the registry. Kansas and Utah all have an approach where certain findings go into the registry and others do not. Kansas only has substantiated cases go into the registry – affirmed findings do not. Utah only has supported that are severe and chronic go on the registry.

Individualized, routinized case analysis – Connecticut, Delaware and New Jersey have policies that push the workforce to analyze every case where they could substantiate to determine if they should place the person on the registry.

Blend of Structural and Individualized -Iowa has a finding that is “confirmed – no registry”. Certain types of maltreatment are eligible for this finding including: (1) physical abuse, (2) denial of critical care – adequate supervision and (3) denial of critical care – clothing. Cases are eligible for “confirmed – no registry” if they are determined to be “minor, isolated and unlikely to reoccur”.

Post – Substantiation Discretion – Maryland and Rhode Island have approaches where they substantiate cases, place them on the registry but then have discretion to not report out certain types of findings at the point of a background check.

Vermont currently has agency discretion, through rule 2000 which states “In all cases where the policy requirements for substantiation have been met and the supervisor recommends unsubstantiation, the individual(s) designated by division policy will make the final determination.”

The Details:

The following constructs were reported by states:

- Arkansas – Supervisor can request no placement to administrator.
- Connecticut – Department must determine that perpetrator present risk to children prior to placement.
- Delaware – Supervisor can request registry tier change to “substantiated-no registry.”
- Iowa - Determines if case should be confirmed – no registry placement or founded based on type of abuse and other factors. Confirmed – no registry placement is possible in physical abuse, denial of critical care adequate supervision, denial of critical care clothing. In order to be considered for confirmed – no registry placement the incident also must be minor, isolated and unlikely to reoccur. Some founded cases can also qualify for removal from registry at 5 years - physical abuse, denial of critical care and presence of illegal substances in child's body are eligible for removal at 5 years if no death or serious injury occurred.
- Kansas – Affirmed findings do not go on registry; substantiated cases go on registry.
- Kentucky – Supervisor discretion can be applied to not place founded cases on registry.
- Louisiana – Certain valid findings can be downgraded to either stay on the registry for less time or not go on at all
- Maryland - Statute states "may report out" so they don't have to share every indicated case.
- Montana – Regional administrator determines if placement is warranted even if elements necessary for substantiation are met.
- New Jersey - Yes - only substantiated cases go into registry. Established cases do not. This is based on analysis of aggravating and mitigating circumstances. SEE PROTOCOL
- Oklahoma – Committee reviews to determine if registry placement is warranted.
- Utah – Only supported cases that are severe and chronic are entered on registry.
- Wisconsin – Required to make maltreatment determination; not required to do a “named maltreater” on the registry.
- Rhode Island – All substantiated cases are placed on the registry, however only some are considered disqualifying at point of background check.

Other highlights

MAINE Allowable findings-After an investigation or assessment, the Department may make one or more of the following findings:

- *Unsubstantiated: Unsubstantiated means an administrative finding made by the Department that there is insufficient evidence to support the allegation that an individual or entity who was a person responsible for the child subjected that child to abuse or neglect.*
- *Indicated: Indicated means a finding made by the Department that an individual or legal entity was a person responsible for a child who was subjected to abuse or neglect, that the abuse or neglect was of low to moderate severity, and that the individual or legal entity poses no further threat of harm to children for whom the person might be responsible through employment or volunteer activities.*
- *Substantiated: Substantiated means an administrative finding made by the Department that an individual or legal entity was the person responsible for a child who was subjected to abuse or neglect where either (1) the abuse or neglect was of high severity or (2) the individual or legal entity poses a threat of harm to children for whom the individual or legal entity may become responsible through employment or volunteer activities.*
- *More than one finding may be made. For example, the Department may determine that a person is “substantiated” for risk of physical abuse to a child but that the same person is “unsubstantiated” for risk of sexual abuse to a child.*

NEW HAMPSHIRE “Founded Determination” means a specific allegation of child abuse or neglect where the Department has determined that there is a preponderance of the evidence to believe that a child has been abused and/or neglected:

1. “Founded, Court Action” means a determination by the court, either after a hearing or pursuant to a consent decree, that a child/youth has been found to be abused and/or neglected through a preponderance of evidence.
2. “Founded, Problem Resolved” means a determination by DCYF that there is a preponderance of evidence to believe that the child/youth has been abused and/or neglected and that the presenting danger has been resolved through the provision of services, supports, or other interventions to protect the child/youth and there are no ongoing safety concerns for the child/youth.
3. “Founded, Services Only” (Non-Court Agreement) means an agreement between the CPSW and the person responsible for the child abuse and/or neglect in which that parties agree that: the report is founded; the responsible party waives his or her right to an appeal; the responsible party’s name will be placed on the state’s Central Registry of founded reports of abuse and neglect; and, DCYF will provide services to the family to address the identified maltreatment.

expansion of time frames for administrative review processes

For the past few years, the Department has put forward legislative proposals seeking to expand time frames by which a grievant may request a review, and by which a review must be held. **H.327** proposes to revise the child abuse and neglect substantiation procedures of the Commissioner for Children and Families’ Registry Review Unit. Specifically, this bill increases the timeframes for requesting a review and holding the review meeting, permits substantiations to be accepted when the person requesting the review does not respond or appear, and permits for virtual reviews during a state of emergency. [Click here for bill](#)

H.169, proposed by the Vermont Parent Representation Center also proposes some expansion of time frames. [Click here for bill](#)

It is clear there is some overlap and room for agreement here. This is a topic which can be explored on Tuesday, September 7th, in upcoming virtual workgroups, or through testimony to the legislature.



Finish line just ahead!

Thank you for taking the time to read through this document. As a reminder, much of this will be presented on the morning of the 7th, and the small breakout groups will be given handouts of the pertinent information. This is not meant to be digested in a day nor is the 7th intended to be the beginning and end of this conversation. It is meant to be a starting point, whereby we collectively take up the questions of what it means to have a fair process where only those who absolutely need to be on the registry are eligible for and experience the deprivation factor of a substantiation.

Remember: the child protection registry is not about seeking justice for a child victim, nor is it about labeling unfortunate parenting choices. The function of the child protection registry is to provide a tool for employers to ensure the safety of kids and vulnerable adults.

While we have a good system in place right now, with layers of due process built in at multiple places, substantiated individuals must have the executive functioning to activate that process and many of the people we work with do not. We need an equitable system in Vermont that serves the safety needs of children and vulnerable adults safe, supports families, and strikes the right balance with honoring the rights of Vermont citizens access to employment and volunteer opportunities.

