 VERMONT DEPARTMENT FOR CHILDREN AND FAMILIES Family Services Policy Manual		<h1>99</h1>
Chapter:	Placing Children and Youth	
Subject:	Confidential Placements	Page 1 of 3
Approved:	Aryka Radke, Deputy Commissioner	Effective: 6/15/2023

Purpose

To:

- Articulate the process for requesting confidential placements and seeking associated protective orders; and
- Outline the limited circumstances in which a child or youth may be in a placement where the identities and location of a resource family is kept confidential from the child’s parents.

Related Policies

Family Services [Policy 82](#): Juvenile Court Proceedings – CHINS

Family Services [Policy 83](#): Juvenile Court Proceedings – Delinquency

Family Services [Policy 121](#): Notification of Changes for Children and Youth in DCF Custody

Family Services [Policy 124](#): Family Time (Parent/Child Contact)

Family Services [Policy 159](#): Foster and Kinship Parent Safety

Family Services [Policy 250](#): Reporting and Responding to Staff Safety Threats

Family Services [Policy 251](#): Staff Safety in Homes and the Community


Family Services [Policy 252](#): Staff Safety During Removals

Policy

The division typically informs parents of the identity of their child’s caregivers and a general location of their child’s placement. In rare instances, a confidential placement may be necessary for safety reasons. Confidential placements may be considered if informing the parents of the child’s placement would compromise the safety of the child/youth or foster/kinship family.

Confidential placements may be appropriate in instances where:

- There have been prior significant threats to foster/kinship families or division employees;
- There are serious domestic violence/intimate partner violence concerns;
- There is evidence of significant drug trafficking or gang violence;
- There is evidence of sex trafficking and there are safety concerns regarding the trafficker/perpetrator; or
- The parents have made threats to kidnap the child(ren) and/or there is a history of stalking.

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Approval Process for Confidential Placements

Confidential placement requests will begin with a supervisory conference between the assigned family services worker and their supervisor. If they decide that a confidential placement should be considered, a written summary (using the SBAR format) of the concerns/situation will be sent to the district director, assigned operations manager, and the staff safety team with a request for consultation. If it is not possible to complete the SBAR to request the consultation, it can be articulated and completed during the consultation. The team on the consultation should identify a person to complete the SBAR.

If the consultation results in the decision that confidential placement is necessary, the district’s assigned operations manager will take the request to the director of operations or designee. Approval by the director of operations or designee is required for all confidential placements.


Following or in conjunction with the consultation and approval process, division staff shall consult with their assigned assistant attorney general (AAG) to seek a protective order in instances where the identities and location of resource families will be kept confidential from the parents. All protective orders will likely have time limitations which will dictate the duration of the confidential placement. If a time limitation is not specified in the protective order, district director approval is required for a confidential placement to last beyond 30 days. Approval by the director of operations or designee is required for a confidential placement to last beyond 60 days.

Administrative staff shall be informed of all confidential placements to ensure placement letters are not sent automatically to all parties.

Assessment of the Risk to Other Children in the Foster Home & RLSI Hold

If there is another child in DCF custody placed in the foster home prior to a confidential placement, the situation must be assessed to determine the level of risk to other children and who can safely remain in the household or be added to the household. Team discussions and consultation with RLSI is encouraged.

The person who approved the confidential placement will notify the director of the Residential Licensing and Special Investigations (RLSI) Unit of the confidential placement. **All confidential placements prompt a hold on new placements in the household** for the purpose of considering the overall safety and well-being of the children and caregivers in the home. District office staff are not permitted to place new children or youth in the home nor ask the caregivers to provide additional respite care while a confidential placement is in effect or until the hold is lifted by RLSI. This does not impact the current placement(s) in the home or existing respite arrangements

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unless otherwise indicated by RLSI based on the nature of the threat or safety concern and the potential impact on other children in DCF custody.

Required Documentation and Communication

A case note alert should be applied in FSDNet for all confidential placements to alert staff to dangerous or potentially dangerous situations. Case note alerts should be dated, list the reason for the confidential placement, and include pertinent details from the protective order. Information conveyed to staff regarding threats and incidents should be factual. Speculative information, rumors, and unconfirmed information should be avoided, unless provided by law enforcement. Messaging should minimize traumatic impact. Except in extraordinary circumstances, no communication of a threat or incident shall include medical information, information pertaining to the sheltering of victims of domestic or intimate partner violence, or other confidential information. Where circumstances require the sharing of such information, care shall be taken to ensure that it is protected and occurs in consultation with the domestic violence team as needed.

Once a protective order is in place, division staff will make efforts to ensure it is followed and exercise discretion regarding individuals who are informed of the order and placement. For instance, the location of the child’s placement will not be kept confidential from guardian ad litem (GALs) or other partners who need to have contact with the child. There will be a discussion with these individuals about the circumstances that led to the confidential placement, strategies to assure that the placement location remains confidential and confidentiality requirements of the protective order. Case plans may reference protective orders and the expectations of the boundaries that must be followed as clarified in the order.

Family services workers should remind foster and kinship families that even with a confidential placement and protective order in place, the division cannot assure their identities or location will not become known.

Staff should consider other strategies for notifications and communication to maintain the confidentiality of the placement. For instance, conducting *Initial Caregiver Meetings* and *Shared Parenting Meetings* remotely without foster parents’ cameras turned on or names listed; assuring that the medical and dental home, childcare, and/or school does not list foster parent names and addresses/send out automatic notifications; and the same considerations with any other service agencies that are involved. Additionally, consideration should be given to the implications of youth with phones or devices, location sharing, and other ways information could be accessed online or through the child.