

Act 154 Investigation Findings Framework Notes – October Stakeholder Meeting October 9th, 2025

Please be advised that these meeting notes do not constitute decisions formally made by the Division, although they may be implemented into the final Act 154 policies and procedures. Information included herein includes input from multiple agencies, the Act 154 Core Team, and stakeholders.

Presentation:

Provided by Nancy Miller, Child Safety Director, and Lindsay Barron, Director of Policy and Planning.

Key Discussion Points:

- What types of constraints require an organization to check for an employee/volunteer's name on the Child Protection Registry (CPR)? Are there impacts on funding types, the agency's accrediting body, or other considerations?
Notes about employer registry checks:
 - The applicant for employment must provide permission for the CPR to be checked.
 - To request a "self-check," there must be a notarized document completed. An employer check does not require notarization. Discussion was engaged in surrounding the equitability of this process.
 - Any time a registry check is done and it is positive for a name inclusion, a letter is mailed to the person to notify them (there may also be an email/phone call made to ensure proper notification occurs).
 - Future thinking should be engaged in surrounding communication processes for notification.
- It will be important to ensure continued clarity and the use of "plain language" in any documents or forms.
- The Family Services Division (FSD) was encouraged to explore options to support information-sharing authorizations if individuals require assistance/advocacy surrounding the CPR process.
- A question was asked about whether there is data/research on whether registries truly support child safety. The response included the consideration that measurables for this are difficult since there are significant differences from state to state, and the ability to research/compare a "what could have been" situation is not likely to be possible.
- An article was shared regarding the question above: "How to Remedy Harm Caused by State Child Abuse Registries" - The Annie E. Casey Foundation.

The Group's Review of the Investigation Determination Decision-Making Process: Resonates/Agreement:

- Inclusion of appeal level information. What/where are those steps in the overall process?
- It was noted that there are more opportunities to appeal a CPR name placement than placement on the sex offender registry. The CPR review is very robust.

What is Missing?:

- Specific considerations surrounding substance misuse and addiction.
- Clear processes for appeal at every level.

Worries/Concerns:

- Is a determination/internal finding (founded) appealable (like a substantiation)?
 - Internal findings (founded) will have a layer of due process, but it is not developed yet – this will be required in rule-making as part of Act 154 (like the CRRU's function).
 - How is "internal" defined? DCF-accessible information (childcare licensing, etc.)? Specifically, access by the Child Development Division (CDD)?
- Concerns about better communication and considerations around the ability to appeal (consider what burden is placed on individuals who appeal).
- Internal findings seem to add a lot of complexity to the process; are the absolutes enough to determine abuse/not – does there need to be an internal finding?
 - What is the burden on staff/FSD to implement something like this vs. potential changed/improved outcomes for this?
- Would there be a fear from staff to cite an internal "founded" finding vs. a substantiation?

Questions/Next Steps:

- Is there data on the number of Family Services staff members working on investigations?
- Is there any data on turnover before/since COVID?
- Inquire from New Jersey about what aspects of their model work and don't. Have they learned any valuable lessons? (Note: Vermont has explored modeling our system reform to be like New Jersey's).
- Consultation/inclusion from stakeholders from Disability Rights Vermont and Families United.