

I am not in agreement with the recommendation to close Woodside because:

1. Vermont needs small 10 bed detention unit to house violent, out of control juvenile youth who can not be safely housed in a less restrictive setting while they await adjudication and/or placement in a less restrictive setting appropriate to meet their treatment needs at that point in time.

2. If Vermont has its own unit, DCF would be able to continue offering housing to DOC for youth under the age of 18. Without this option, DOC would have to house such a youth in a closed unit to meet the Federal guideline of no sight or sound of the adult population. This is in my opinion a form of abuse. Also, I do not feel that closing an entire unit in a jail that is probably full for 1 adolescent is a good use of my tax dollar.

3. The DCF Commissioner has stated that Vermont's youth have changed and this type of program is no longer needed. He attributes this conclusion in part I believe to the drop in the utilization of Woodside. Maybe the youth have changed, but I doubt they have changed that much. Why has the utilization dropped? I think some reasons to consider are:

A. DCF staff who are not experts in the Juvenile Justice field are trying to do the work. DCF once had a unit in each District that specialized in JS work, these units were consumed by Child Welfare work and therefore most of the staff lost their working knowledge of JS rules, regulations, and laws. There are youth today in custody as a CHINS when they should be in custody as a delinquent. DCF is returning to JS specialization of staff. I would expect the Woodside admissions to increase once youth are adjudicated correctly and all JS staff know and understand the laws, rules, and regulations related to the JS system.

B. How and when to use Woodside has changed dramatically over the past 5 or so years. I suggest that these rules need to be re-reviewed and perhaps amended so that DCF staff, youth, and programs like Depot feel there is a bottom line. Some youth experience behaviors/urges/feelings way beyond their control and sometimes being in a program that has walls, locked doors, high fences, and is treatment oriented makes them feel safe and allows them the space needed to get their behaviors/feelings under control. And we need to make sure the youth has a chance at some level of success in a less restrictive setting. If you utilize Woodside in such a manner, your utilization will increase.

C. If Woodside has an atmosphere that is non-punitive, non-correctional, and more therapeutic in nature, your utilization will increase.

4. I have heard that DCF is also considering contracting out this service need. There are many pros and cons to this, but I will stick to what is near and dear to me.

A. Under no circumstances should DCF give the admission/discharge role to an outside agency. It should remain where it is right now.

B. The program site should centrally located in the state.

C. The admission/discharge regulations regarding who can be admitted should be reviewed and written in a manner that is more conclusive to JS work.

5. I will not venture into new building vs old building as I have insufficient information to draw a sound conclusion. But should the State decide to build a new building, I would urge that the design committee include people who are very knowledgeable about the youth who will reside in the building. And if the Legislature has a role in this, please make sure that Institutions and Health/Welfare work together with DCF and BGS. Also, the current site should not be closed until the new one is up and running. This would allow for some care staff to transfer into positions in the new facility which is an absolute necessity for obvious reasons.

6. I have heard that one of the reasons to close Woodside has to do with the cost to the general fund. As Dick Sears told me - 'it is impossible to justify keeping the facility open for less than 5 residents at a cost of \$6 million GF dollars. The average has been 3 which works out to be about

\$2 million per bed per year.' I agree. I assume that the program is staffed for its licensed capacity. So could you order a cut back to 10 beds to occur immediately? This might save some money in this fiscal year and keep the program operating on a smaller scale.

7. I applaud the work of the DCF/Woodside staff and the providers in their effort to keep VT youth safe from themselves and others. Let's give them the tools needed to do the job. Thank you.