

# Voices for Vermont's Children



Respectfully submitted to the Joint Child Protection Oversight Committee  
By Amy Rose, Policy Associate, Voices for Vermont's Children  
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Thank you for the opportunity to testify today. For the record, I am Amy Rose, a policy associate for Voices for Vermont's Children. I am also a parent and adoptive parent in Vermont.

The Families First Prevention Services Act (FFPSA) has been described as innovative, significant, and historic. Many have called it an opportunity to reimagine child welfare, invest in prevention, and shift outcomes. Since the Act was passed in 2018, Vermont has had the opportunity to create a plan that works for our children and youth. After reading Vermont's plan, Voices has several recommendations on ways to maximize this opportunity.

Voices acknowledges that the plan has already been submitted, yet past testimony suggests that our plan is just a starting place. If there are opportunities to adjust and build upon our state plan, we suggest that Vermont take advantage of those opportunities. We know that many stakeholders were involved in conversations about this plan, we continue to urge DCF to include impacted families in these conversations, particularly BIPOC families.

## **Definitions of eligibility**

Voices agrees that investments in family well-being are critical. In Vermont's plan, we have opted for a broad definition of eligibility. Using Title IV-E funding to prevent the need for involvement in the child welfare and court systems seems appropriate. However, this choice will be important to monitor as anytime DCF "broadens their reach", there is the possibility of increasing the number of children and youth in state care.

It appears as though Vermont is opting to defer what it calls "community pathways without DCF involvement", which limits our ability to serve children without involvement in the Family Service Division (FSD) of DCF. **Voices strongly encourages Vermont to reconsider this decision.** This definition of eligibility is the only opportunity for true prevention within this Act. Providers should be able to assess children and youth and provide services without requiring contact with FSD. In this iteration of the Families First plan, DCF describes itself as the default organization for many needs including truancy, children beyond the control of their parents, youthful offender probation, juvenile justice, and child safety. Voices encourages DCF to be very mindful of its many responsibilities and take every opportunity possible to narrow its scope of work to those children and families who truly require an intervention.

The calls that we have received from Vermonters suggest that the child protection system is not fully trusted by all families, especially BIPOC families and families without financial security. This lack of trust is primarily a result of DCFs surveillance functions and the adversarial nature of the court system. If Vermont continues to require FSD system contact to access services, many families will opt out of accessing those services. The UVM Drivers of Custody Rates report recommended diverting prevention funding to family resource centers. Voices supports that recommendation. Voices also suggests that FSD look to the Network, Youth Development Program, and other community serving agencies to ensure that we have a broad range of options to address the needs of children, youth, and families.

### **Evidence Based Practices**

It is worth noting that Vermont only chose a couple of well documented practices to meet the Evidence Based Practices requirement. While there are pros and cons of starting small, it is worth exploring this decision more. Motivational Interviewing has widespread applicability, it also is relatively easy to implement and is already present in VT. Voices was not surprised to see it listed and supports its inclusion. Voices expected to see a home based service delivery option in its service offerings and was disappointed that there isn't a clearly articulated plan or timeline for investing in home based supports. EBP that are flexible, adaptable, and responsive should be explored first.

In the plan, DCF made the argument that it chose the two well documented practices because both of them are currently present in Vermont. Voices continues to challenge DCF to boldly identify what would be ideal in order to serve children and families best. Otherwise, we are missing opportunities to shift our practices and outcomes.

While I do not know of an EBP that addresses basic needs, there is a lot of evidence that economic support increases family preservation. Unfortunately, Child Welfare involvement often results in increased economic hardship (reduced TANF benefits, reduced employment to meet requirements of case plans, increased transportation to meetings and services, housing instability, and more). Chapin Hall has put together research that shows the impact of permanent housing subsidies, paid family leave, child care subsidies, SNAP benefits, EITC, child support, and higher minimum wages on child wellbeing. Title IV-B funding has been described as incredibly flexible; it would be helpful to have more data on what basic needs are identified as unfilled in Vermont, to what degree the state is able to meet them, and what gaps continue to exist. We must actively and urgently support communities in having the resources and support they need to ensure that all children can remain at home safely with their families. **Voices encourages the legislature to prioritize policies that increase economic and family stability.**

### **CCWIS/Data System Investments**

Investments in Vermont's data system are long overdue. Voices celebrates the steps being taken to update our data systems. Until this happens, manual data collection will continue to be a burden for staff and will make it difficult to support families and track outcomes.

An effective data system is a necessary step to bring Vermont into compliance with FFPSA. It is also an opportunity to simplify and reduce the paperwork burden for families. Families are often asked to answer intrusive and triggering questions in multiple settings. Thoughtful, consensual information data sharing could shift that practice. It will be important to be transparent about who is entering data, who is accessing data, and what that data is used for. In order to build trust and have an effective system, Voices encourages DCF to listen to the concerns of families about data sharing and single source data entry.

Foster parents have been incredible advocates for an updated data system for years. They have shared stories of situations in which Vermont's antiquated data system has made it difficult for Family Support Workers and foster parents to serve kids well. Vermont's paper trail has made it difficult to get vital information to families when transitions occur. Medication errors have occurred, past placements and family connections were not captured, and other vital information has been lost or inaccurate causing undue harm to kids in state care. It is fitting that Families First may be the pathway to much needed data system upgrades.

Youth who are exiting care continue to be denied access to their records. DCF has described how labor intensive it is to redact files in order to give youth access to them. Similar to a medical model, Voices encourages DCF to consider ways in which certain fields could be accessed by the "client" when the new data system is built/purchased.

#### **Things to pay attention to as we move towards FFPSA implementation**

- How can we best support DCF and our provider network in order to ensure we have skilled/trained staff available to support our children, youth, and families?
- How can we ensure that services are available equitably around the state?
- What do we know about long term outcomes for kids who have been in state care? Do we have any data on young adults who do not participate in the Youth Development Program? What can we learn from this data?

#### **Other emerging intervention ideas to explore**

- Explore universal trauma response models as they are less stigmatizing and not an automatic pathway to interventions. Handle with care, after hour well checks, respite, and additional mental health crisis response services are investments to explore.
- Look at mandated reporting training, consider adding a "mandated supporter" piece for professionals who support kids and youth. Make sure educators and service providers have the resources, training, and tools available to support youth who are experiencing trauma and instability.
- As we look to support youth who are pregnant, consider peer support models, doula services, and other innovative support structures.

Between the CHINS report, the UVM report, and the Families First Plan – the legislature has a lot to ponder as you decide on your action steps. Voices was pleased to see some common

threads between the documents. Your committee has asked important questions about the gaps in oversight for Kurn Hattin this summer. You are also aware that Vermont currently has gaps in its continuum of care. This work is important and it takes time to listen, understand, research, and choose the path that will reduce harm and increase stability. The House has passed a strong bill to establish an Office of Child, Youth, and Family Advocate. At a time when the pendulum is shifting towards family preservation, and the state is holding the responsibility to support family well-being, it is critical that there be an entity that is dedicated to monitoring and reporting the impacts of policy shifts on children and youth in our state. This minimal investment will allow for systems oversight all year. There is often a perceived tension between family preservation and child safety. The goal is to have both – striking that balance is difficult work with high stakes. I would like to personally thank each of you for your commitment to getting it right and look forward to working with each of you in your committees of jurisdiction to center children and youth in your decision making.