
Report to

The Vermont Legislature

Comprehensive Plan Concerning the Development, Implementation, and Enforcement of the Animal Welfare Laws of the State of Vermont

In Accordance with 2024, No. 167 (H.626)

Submitted to: House Committee on Government Operations and Military Affairs
Senate Committee on Government Operations

Submitted by: Lisa Milot, Director, Division of Animal Welfare

Report date: January 20, 2026

BACKGROUND

In 2024, the Vermont General Assembly created the Division of Animal Welfare within the Department of Public Safety and directed the Commissioner of Public Safety to appoint a Director of Animal Welfare.¹ Lisa Milot was hired as Director and began work in May 2025.

Director Milot was charged with developing a comprehensive plan for the development, implementation, and enforcement of the animal welfare laws of the State. By statute, the plan must be submitted to the House Committee on Government Operations and Military Affairs and Senate Committee on Government Operations within 8 months of her beginning work as Director and include:

- (A) how the Director proposes to oversee the investigation of, and response to, animal cruelty complaints in the State in order to provide the best services to Vermont's animals statewide;
- (B) how the Director proposes to coordinate administration and enforcement of animal welfare laws in the State in a collaborative manner with those law enforcement officers and municipalities that retain authority to enforce animal cruelty requirements in the State;
- (C) how the State should address the extent and scope of any deficiencies in Vermont's system of investigating and responding to animal cruelty complaints;
- (D) how the State should ensure that investigations of animal cruelty complaints are conducted according to systematic and documented written standard operating procedures and checklists;
- (E) a proposal to house and care for animals seized in response to complaints of animal cruelty, including how to pay for the care of seized animals;
- (F) a proposal for funding animal welfare administration and enforcement in the State, including potential sources of public and private funding; and

¹ See 20 V.S.A. § 3202.

(G)recommended amendments to animal welfare statutes or rules, including standards of care for animals housed or imported by animal shelters or rescue organizations.

In addition, the General Assembly directed the Director to consult with the State agencies that respond to animal welfare complaints or with animal welfare responsibilities to estimate the number and type of animal welfare complaints received by State agencies and to quantify the amount of time State agency staff expend in fulfilling animal welfare responsibilities, including the costs to agencies of fulfilling the responsibilities.

This Report contains the required comprehensive plan and other requested information.

EXECUTIVE SUMMARY

Vermont's animal welfare system plays a critical role in protecting animals, safeguarding public health and safety, supporting community stability, and preventing violence. While Vermont has a strong foundation of committed animal welfare professionals and volunteers, its current legal and institutional framework has developed in a patchwork fashion over time and does not consistently reflect modern best practices, current community needs, or a prevention-oriented approach.

This Report proposes a comprehensive, phased strategy to modernize Vermont's approach to animal neglect and cruelty and with respect to pet animal welfare more broadly. The recommendations draw from existing research and emphasize early intervention, escalating responses, and coordination across animal welfare, public safety, and human services systems. The goal is not simply to respond to harm after it occurs but to reduce preventable suffering, improve efficiency and coordination, and better allocate limited public resources.

Core Findings

- Animal welfare, public safety, and human well-being are deeply interconnected, requiring coordinated, cross-sector responses.
- Preventable neglect is widespread and often driven by limited access to veterinary care, housing instability, lack of education, and absence of consistent use of early, non-punitive intervention tools.
- Statutory provisions governing animal welfare are outdated, dispersed, and inconsistent, creating enforcement gaps and confusion.
- Civil enforcement opportunities are not currently widely available so that harm is not effectively prevented.
- Criminal enforcement is best suited to instances where harm is emergent, serious, willful, or connected to harm to people.
- Involving stakeholders is critical to develop, implement, monitor, and revise the impacts of policies and approaches.

Summary of Proposals

1. Update minimum care standards.

Establish clear, modern minimum care standards for pet animals that can be enforced through civil mechanisms. These standards would function as an early-warning system, allowing intervention before conditions rise to the level of cruelty.

2. Invest in community-based prevention and support.

Build programs that expand access to veterinary care, temporary emergency housing for pets, and education. These interventions help preserve the human-animal bond, prevent abandonment, and reduce enforcement and sheltering costs as well as alleviating human and animal suffering.

3. Expand civil responses.

Train humane officers and develop robust non-criminal tools such as resource referrals, warnings, tickets, compliance plans, search and inspection warrants, and temporary seizures to address many animal welfare concerns efficiently and consistently, reserving criminal enforcement for emergent, serious, or willful harm, and actions linked to harm to people.

4. Establish regional Animal Cruelty Response Units.

Establish a multiagency working group to devise an approach to establishing regional response units composed of sworn law enforcement, prosecutors, humane officers, human services professionals, veterinarians, nonprofit organizations, and trained volunteers to improve responsiveness, coordination, consistency, and outcomes in cases involving animals.

5. Plan for sustainable staffing and funding.

Align staffing of the Division of Animal Welfare with expanded responsibilities and explore diversified funding sources, including realigning special-purpose fees with their payors and increasing compliance with existing laws concerning taxes and fees to ensure long-term program viability without undue burden on taxpayers. For preventive programs, apply for grant funding, develop public-private partnerships, and establish donation funding streams.

6. Create a structured legislative review process.

Utilize the existing Animal Cruelty Investigation Advisory Board or a newly-formed Advisory Board to guide a deliberate, prioritized, stakeholder-informed review and modernization of Vermont's animal welfare statutes with proposals for reform made at appropriate times.

Approach and Implementation

This Report proposes an incremental, iterative, and collaborative process. Recommendations are designed to be phased in over time, evaluated regularly, and adjusted based on data, outcomes, and stakeholder feedback. By prioritizing prevention and civil responses, Vermont can improve outcomes for animals while strengthening public trust and making more effective use of limited law enforcement and judicial resources.

Conclusion

Modernizing Vermont's animal welfare system is not solely an animal protection issue: It is also a matter of public health, community safety, housing stability, and human well-being. By adopting the Plan set forth in this Report, Vermont has the opportunity to lead with a humane, efficient, and evidence-based model that reduces suffering, prevents harm, and supports healthier communities for people and animals alike.

INTRODUCTION

The current system for enforcing Vermont's animal welfare laws is fragmented and inconsistent.² Statutes governing animal welfare oftentimes do not reflect best practices and several critical enforcement and oversight functions are either inadequately performed or not performed at all. There is no unified approach to responding to cruelty complaints, resulting in even some egregious cases going uninvestigated, and there oftentimes is no follow-up to ensure compliance when an initial investigation reveals deficiencies in care. Residents willing to speak up about harm they see are at times led in a dizzying game of "not it" as responsibility is bounced between entities. Officers investigating a complaint may lack training or experience with the species whose care they are required to assess, undermining effective enforcement and humane outcomes for animals and frustrating the responding officers, animal owners, and complainants alike.

At the same time, Vermonters are increasingly struggling to meet their animal welfare obligations. Access to veterinary care is limited in many regions of the state, contributing to neglect rooted in treatable medical conditions. Delays in accessing spay and neuter services can quickly escalate into hoarding situations when a single unaltered dog or cat produces multiple litters in rapid succession. Rising food prices further strain household budgets, forcing difficult tradeoffs that jeopardize animal health as money spent on human food is no longer available for pets. Housing insecurity and widening economic inequality compound these pressures, making it increasingly difficult for many people to care adequately for their animals.

Unlike many states, Vermont does not have open-admission municipal shelters where owners can relinquish animals for which they can no longer care. As a result, owners facing crisis may keep animals despite an inability to care for them or may abandon them. Brick-and-mortar humane societies that have historically assisted in these cases increasingly schedule intake weeks or months out as kennel and cage space remains full and rescue organizations that rely on volunteer foster homes routinely operate at or beyond capacity.

Research exists into the interventions that are most effective at addressing animal cruelty.³ Findings suggest that the most beneficial investments a state can make in this area are:

- Increasing the number of dedicated animal-specific enforcement personnel, including sworn law enforcement officers, humane officers, veterinarians, and specialized prosecutors;

² See Vermont Department of Public Safety, Act 147 Section 38 (H.729) Report: Unification of Animal Welfare and Related Public Safety Functions (Jan. 15, 2023) at 4, available at <https://legislature.vermont.gov/assets/Legislative-Reports/Act147-Report-Section-38-H729-Report-Submitted.pdf> (Act 147 Section 38 Report), detailing the fragmentation and inconsistencies.

³ See R. Niemiec, et al., *Lessons Learned from Addressing Animal Cruelty and Neglect Across the United States*, available at <https://sites.warnercnr.colostate.edu/animalhumanpolicy/ahpc-study-identifies-what->

- Providing specialized animal-crimes training for law enforcement officers, prosecutors, and judges;
- Involving human support services, including social workers, in creative ways to address underlying vulnerabilities that contribute to cruelty; and
- Developing short-term housing and transport options for seized animals and those surrendered in connection with criminal investigations.

Best practices emphasize enforcement approaches that begin, in most cases, with offering community resources, such as low-cost veterinary care, spay/neuter services, and free pet food, along with education and opportunities for voluntary relinquishment with confirmation that compliance with respect to the care of retained animals is achieved.⁴ Criminal charges are most effective when reserved for emergencies, the most egregious cases, and cases where harm to an animal is linked to harm to a vulnerable human, or for situations in which an owner failed to come into compliance despite being given a meaningful opportunity to do so.⁵

These findings are particularly relevant to Vermont, where enforcement responsibilities are diffuse, preventive services unevenly available, and the criminal justice system is backlogged with cases involving harm to people.

This Report sets forth a plan for Vermont to develop a humane and effective Division of Animal Welfare. Under this proposal, the Division would serve as a resource for State and local enforcement agencies, employing a handful of staff able to lead or assist in addressing reports of potential cruelty, as appropriate, and coordinating with regional response units. It would also provide support for the animal welfare nonprofit organizations that provide valuable services to the people and animals of Vermont, entering into public-private collaborations and assisting in grant-writing and service provision where possible.

This Report relies on the following eight principles in developing a comprehensive plan to update and unify Vermont's approach to animal welfare:

- **Humane Treatment Obligation:** Ensuring that animals are treated non-cruelly is an ethical obligation of a humane community, not merely a legal one, and is supported by a growing body of research in animal neuroscience establishing that many

[works-and-whats-needed-to-address-animal-cruelty-nationwide/](https://www.popcenter.org/works-and-whats-needed-to-address-animal-cruelty-nationwide/) (Jan. 5, 2026) (hereinafter, *Lessons Learned*). See also Arizona State University Center for Problem-Oriented Policing, *Summary of Responses to Animal Cruelty*, available at <https://popcenter.asu.edu/content/animal-cruelty-summary> (summarizing prior research into effective prevention and prosecution of animal cruelty) (hereinafter, *Summary of Responses*).

⁴ See *Lessons Learned* and *Summary of Responses*, *supra* note 3.

⁵ See *Lessons Learned*, *supra* note 3. See also *Summary of Responses*, *supra* note 3 (showing that the best predictor of legal compliance is the likelihood of detection of wrongdoing and that a schedule of escalating responses is more effective at preventing crimes than an immediate law enforcement response).

animals experience pain, distress, fear, and pleasure even though legally classified as property.

- **Prevention Imperative:** Much of the harm caused by animal cruelty is irreversible: Once it occurs, it can only be managed, not undone. Preventing cruelty is therefore a core component of a humane community and an important part of any cruelty response plan.
- **Human-Animal Bond Importance:** Because animals often play a central companionship role in many people's lives, human and animal welfare are inextricably linked. Effective and humane animal welfare solutions must be embedded in broader community support systems, particularly for vulnerable populations including children, unhoused individuals, elderly people, and survivors of domestic violence.
- **Effective Enforcement:** Animal welfare issues that can be effectively resolved through civil action, education, or the provision of resources should be handled through those means, reserving limited law enforcement time and resources for emergent cases and those involving serious harm, persistent neglect, intentional cruelty, or actions linked to harm to vulnerable people.
- **Need for Expertise:** Crimes against animals often involve complex, technical evidence and frequently co-occur with other criminal activity, including gang activity, drug crimes, and crimes against vulnerable humans. Officers responding to animal cruelty cases should receive specialized training on investigations involving animals and possess sufficient familiarity with the indicators of related crimes to know when and how to involve appropriate experts and when to escalate a response.
- **Cost Management:** Housing and caring for animals seized in cruelty cases imposes significant costs on animals, caregivers, and public and nonprofit entities. These costs should be managed proactively and steps should be taken to reduce or eliminate unnecessary expenses and care burdens.
- **Allocation of Special-Purpose Fees:** Special-purpose fees may be appropriate where they offset expenses caused by an activity or where the programs funded by the fees uniquely benefit those paying them. Such fees should be transparent and directly tied to related programs.
- **Dynamic Approach:** Any plan to improve Vermont's approach to animal welfare must be regularly reviewed and revised in light of new data, changing conditions, and evolving understandings of best practices. Collaboration with stakeholders is critical to this, allowing insights and experience to be pooled for better outcomes.

This Report is divided into seven parts that apply these principles and animal welfare best practices to the topics required by 20 V.S.A. § 3202(b)(1) and (c) and propose a framework for building a sustainable and humane Division of Animal Welfare:

Part 1: Current Status

Part 2: Plan for Reducing Animal Neglect and Cruelty

Part 3: Plan for Animal Cruelty Response

Part 4: Plan for Staffing Needs and Funding Sources

Part 5: Plan for Legislative Review

Part 6: Summary of Required Elements of the Comprehensive Plan

Part 7: Potential Implementation Timeline

This Report intends to offer meaningful actions that can be implemented without the need for significant monetary or infrastructure investment. However, the development of a long-term plan of action to reach a true, best-practice state will require ongoing collaboration, creativity, and ultimately the commitment of additional resources.

PART 1: CURRENT STATUS

Understanding the current state of animal welfare in Vermont is the first step towards developing an effective animal cruelty response plan. This Part provides an overview of the effectiveness of Vermont's animal welfare laws in preventing, identifying, and penalizing animal cruelty; the status of the resources needed for Vermonters who choose to have animals to comply with their animal welfare obligations; the process by which potential animal cruelty concerns are reported, investigated, and prosecuted; the housing of animals held in connection with criminal cases; and the current staffing and funding of the Division of Animal Welfare.

Animal Welfare Laws

Vermont is ranked as a “Middle Tier” state with respect to its criminal animal protection laws.⁶ In contrast to the states ranking in the Top Tier, Vermont’s animal cruelty laws have not been comprehensively modernized leaving gaps in coverage. Animal cruelty offenders are not banned from possessing animals for any period of time so that in some instances even the specific animals found to have been cruelly treated are returned to their abusers or to the same home in which their abuser lives. No cross-reporting laws exist so that the link between crimes against vulnerable people and crimes against animals may be missed, endangering both human and animal safety and lives. Standards of minimum care are ambiguous and limited making it difficult for owners and officers to assess whether legal requirements are being met until after an animal has died of neglect.

Practical chokepoints in reporting, investigating, housing the victims of, and prosecuting cruelty mean that, at times, animals remain in or are returned to homes where their treatment or conditions are not legally adequate simply because there is no investigation undertaken or no place to affordably and humanely house them for months on end. Nonprofit organizations struggle under the financial, custodial, and emotional burden of caring long-term for animals seized in connection with criminal cases; while restitution is in theory available for their out-of-pocket expenses, in reality it is often not required, is unpaid, or trickles in a few dollars a month for years on end. Spaces used to house seized animals are unavailable to assist with rehoming animals Vermonters can no longer keep and seek to voluntarily relinquish creating a backlog of animals in need.

In addition, Vermont lacks basic visibility into the conditions under which pet animals are bred, imported, housed, and transferred to new owners within the State⁷ and the

⁶ See Animal Legal Defense Fund, *Animal Protection: 2024 U.S. State Animal Protection Laws Ranking Report*, available at <https://aldf.org/project/us-state-rankings/>.

⁷ Vermont law requires that cats, dogs, wolf-hybrids, and ferrets imported for commercial purposes, including adoption, receive a health certificate prior to entry, 20 V.S.A. § 3915 (“Health certificate for transport into State”), but these documents are not currently reviewed. Beyond general rabies vaccination requirements, there are no statewide veterinary care or behavioral standards governing animals imported or held for adoption by animal shelters, rescue organizations, or other entities or individuals. Rescue animals are not even required to be spayed or neutered and there is no restriction on the importation of dogs with bite histories or of wolf-hybrids.

scale of these activities.⁸ As a result, there is no data-driven way to assess whether the supply of cats and dogs aligns with demand and no way to be confident that the involved animals are being housed and cared for in ways that protect their welfare, public safety, and public health. Animal hoarding is, sadly, not uncommon as volunteers feel pressure to take on more and more animals; some pass the point where they have the capacity to humanely care for them. Vermont currently lacks an effective early-warning system to prevent manageable problems from becoming widespread and costly crises.

Although Vermont no longer permits the sale of cats and dogs in retail pet shops, substantial home- and farm-based breeding and sales, some at high volume, exist,⁹ creating a significant loophole in efforts to prevent substandard breeding and sales practices. This means that animals held for breeding may be inhumanely housed and preventable health and behavioral issues get passed on to consumers, nonprofit organizations, municipalities, and the State rather than being addressed by those who profit from the activities.

Availability of Resources Needed to Provide for Animal Welfare

Limited access to basic veterinary services is a significant contributing factor in preventable animal neglect. In rural parts of Vermont, the nearest veterinary practice may be located at a substantial distance from an animal owner; in some areas, it is difficult to find a practice that is taking new clients and there are no nearby urgent or emergency care options. For residents without reliable transportation, routine veterinary care may be effectively inaccessible. As a result, treatable conditions such as skin infections, dental disease, parasite infestations, and minor injuries may go unaddressed, increasing animal suffering and the likelihood of a need for legal intervention.

Even where veterinary services are geographically accessible, the cost of basic care can be prohibitive. Preventive care and early treatment are often delayed or forgone in households already strained by rising housing, food, and energy costs. In these circumstances, care of animals may fall below minimum standards despite an owner's willingness to comply, leading to enforcement outcomes and suffering that could have been avoided through earlier access to affordable care.

⁸ A review of public websites and of data provided by Shelter Animals Count, a voluntary database where some nonprofit organizations report their intake and dispositions of cats and dogs, shows at least 94 animal shelters and rescue organizations operating in Vermont, as well as more than 20 out of state shelters and organizations advertising animals for placement here. These figures are certainly an undercount, though, as many organizations and solo rescuers rely on individual social media accounts or standalone websites rather than centralized adoption platforms such as Petfinder or Adopt-A-Pet for their listings and thus prove difficult to identify.

⁹ Animal control officers report that large-scale commercial breeders have relocated to Vermont in recent years, particularly to farms in rural areas where it is unlikely a resident will be able to see the operations and flag any deficiencies in care.

Animal control officers report increasing difficulty in obtaining rabies vaccinations for impounded dogs due to packed veterinary clinic schedules, leading to delays in being able to return stray animals to owners or requiring return without even this basic veterinary care.

Demand for affordable spay and neuter services for cats and dogs routinely exceeds available capacity in Vermont. Owners may face waitlists of several months and affordable options for larger dogs are often unavailable. During these delays, unaltered pets may reproduce, resulting in unintended litters that can quickly overwhelm an owner's ability to provide adequate care. These situations escalate at times into neglect or hoarding cases not because of malicious intent, but because timely access to affordable sterilization services was unavailable.

Small-scale homesteaders often face similar access difficulties for agricultural animal¹⁰ care. On-farm veterinary care may be expensive or unavailable, and new owners may lack familiarity with early signs of illness or malnutrition leading to delays in seeking veterinary assistance. Investigations into agricultural animal neglect at times reveal gaps in knowledge and access rather than intentional cruelty.

Animal abandonment and neglect often co-occur with human crises such as domestic violence, homelessness, natural disasters, temporary housing instability, or medical emergencies. In Vermont, where addressing housing insecurity is a top priority, it is particularly important to find ways to safely house animals during these disruptions so that relinquishment, abandonment, or deterioration in care does not create avoidable harm to animals while compounding stress, health risks, costs, and instability for people.

In some instances, needed resources, such as pet food pantries, hay banks, and spay/neuter assistance, may be available but information about them may not be readily available to the people who need it.

Animal Cruelty Response

Vermont's animal cruelty complaint and response system is currently fragmented and inconsistent. Officially, initial complaints may be made to a local animal control officer or constable, or to the agency with law enforcement jurisdiction for the municipality whether the Vermont State Police (VSP), a municipal police department, or a Sheriff's Department. In practice, complaints are also made to the Department of Fish and Wildlife (DFW) or submitted through the complaint portal on the website for the Vermont Agency of Agriculture, Food & Markets (VAAFM).

At times, residents experience high levels of frustration in trying to report potential animal abuse. An attempt to report may require calls to a Town Clerk, animal control officer, constable, Sheriff's Department, local law enforcement agency, state police barracks, and game warden, each of which tells the caller to report it to a different agency.

¹⁰ Together, livestock, horses, and poultry are referred to as "agricultural animals" in this Report.

Since August 2022, DFW has assumed the lead investigator role for many animal cruelty complaints in jurisdictions that otherwise rely on VSP for law enforcement. When a nonemergency cruelty complaint is made to VSP, dispatch typically refers the matter to the appropriate Game Warden. If the complaint arises during a response to another call (such as domestic violence) or involves emergent harm, a VSP trooper typically takes the lead. Non-cruelty animal complaints made to VSP dispatch, such as an animal running at large, may be handled by a law enforcement officer or referred to a municipal animal control officer.

Municipalities with local police departments or contracts with a Sheriff's Department rely on those entities to investigate cruelty complaints within their jurisdictions. While some agencies employ animal control officers authorized by law to investigate such complaints, this is uncommon.

Law enforcement officers are required to complete a training module on animal cruelty investigations¹¹ during their provisional certification period. This course, currently provided by Humane World for Animals,¹² focuses primarily on basic statutory requirements. Given its limited duration (currently three hours), it does not address cases involving animals other than dogs and cats, advanced evidentiary issues that are specific to animal cases, or how to handle seized animals.

Housing for seized animals may be at an animal shelter, in foster homes, on farms, at sanctuaries, in boarding facilities, or with private individuals, at times including neighbors of a defendant. To a large extent, the animals go wherever there is space and a willing custodian regardless of training or security. Pending seizures are sometimes revealed in advance as involved entities ask for help on social media.

Information about cruelty cases, including photographs and videos that may serve as evidence in a criminal trial, are posted on social media to raise the funds needed to rehabilitate the animals and care for them for months on end. While necessary given the funding needs of the organizations providing housing for the animals associated with a case, this potentially undermines a defendant's constitutional right to an impartial jury trial as inadmissible or partial evidence may be widely-publicized. In at least some recent cases, defendants have threatened caretakers with violence over seized animals after their location has been disclosed.

In 2024, VSP opened 408 unique "animal incident" cases, of which 111 involved potential severe neglect or cruelty. Of these, 82 involved pet animals, 27 involved agricultural animals, and 2 involved both. Two cases resulted in arrests and 69 were referred to DFW for investigation. VSP does not track officer time by case type so no tabulation of time or time cost is available for its response to these calls. It incurred \$16,242 in veterinary and housing expenses associated with cruelty cases that year.

DFW opened an additional 99 potential cruelty cases in 2024 and investigated many of the referrals from VSP. Sixty-one of these additional cases involved pet animals, 29

¹¹ See 20 V.S.A. § 2365b ("Animal cruelty response training").

¹² Humane World for Animals is a national nonprofit organization and was formerly known as the Humane Society of the United States.

involved agricultural animals, and 6 involved both.¹³ These investigations resulted in 7 arrests, 2 warnings, and issuance of 1 civil ticket. In SFY2025,¹⁴ DFW incurred \$87,704 in employee time, animal housing, veterinary care, and related expenses for investigations involving animal cruelty. Dorset Equine Rescue, a Vermont nonprofit organization, incurred an additional \$29,029 in 2024 in unreimbursed costs related to horse seizures by DFW.

This data excludes costs borne by municipalities (including those, like Burlington, that have a local police force and those that rely on a Sheriff's Department for enforcement), most nonprofits, animal control officers, and volunteers, as well as incidents never reported due to confusion about reporting pathways or loss of confidence in the system.

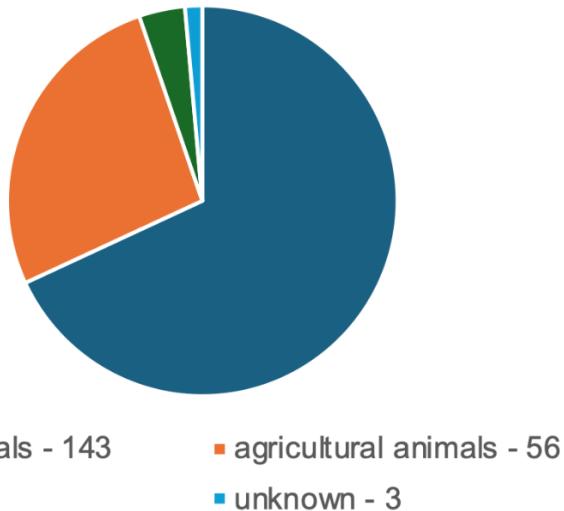
Importantly, case closures without warnings, tickets, or criminal charges do not necessarily indicate a lack of violations or successful compliance efforts. Follow-up inspections are rare, even where deficiencies, such as emaciation, inadequate shelter, lack of water, or untreated medical conditions, are present on an initial visit; rechecks typically occur only if a new complaint is filed. As a result, it is often unknown whether conditions improved or even if the animals survived, particularly in rural settings or where the animal was enclosed inside a building or otherwise not visible to passersby and thus not susceptible to being reported if still in distress.

Dogs and horses were the most frequently involved species. While many complaints involved only one or two animals, agricultural animal cases often involved larger numbers, typically associated with horse care or small-scale, noncommercial farming operations not subject to VAAFM oversight.

¹³ In 3 cases the type of animal was not recorded.

¹⁴ DFW cost data is for SFY2025 instead of the 2024 calendar year because the data on cases opened was collected separately from the data on expenditures and the inconsistency was not noted prior to final preparation of this Report. There is no reason to think the cost estimates would be meaningfully different if provided for 2024 instead of SFY2025.

**2024 Potential Animal Cruelty Cases
Opened by State Agencies
by Animal Type
(total = 210)**



Additional systemic gaps include inconsistent access by law enforcement to species-specific expertise, lack of available housing for seized animals leading to decisions not to pursue enforcement, and informal practices such as encouraging surrender of animals in lieu of charges without addressing conduct or ensuring accountability.

Given these limitations, the scale of resources required for an effective statewide response remains uncertain. Accordingly, reforms proposed in this Report are iterative, with ongoing evaluation and adjustment to be informed by improved data collection and experience.

Housing for Seized Animals

Animals seized in connection with cruelty cases often remain in legally-required custody for 6 months or more. This is problematic from both an animal welfare perspective and a resource management one. Long-term kenneling or caging is stressful for animals and causes mental and behavioral degradation, as well as costing significant amounts of money and being demoralizing for the volunteers and staff members who care for the animals. Moreover, at times there simply is not space to hold the number of animals seized.

Decision-making regarding medical care for seized animals can be challenging since they belong to one person while in the legal custody of another. Animals can produce offspring while being held, adding to the housing and medical costs and, when a pet animal in custody gives birth, it greatly increases the care burden because of early socialization requirements if the offspring are going to be suitable as pets when available for adoption. In some cases, seized animals are too undersocialized to be held humanely. And space and staff time used to house seized animals is not available for stray animals or to assist law-abiding Vermonters in rehoming their pets.

While, in theory, current law allows for swift title forfeiture or return,¹⁵ in practice animals are typically held in limbo for 6 months or more unless their owner agrees to relinquish title. State's Attorney's Offices may delay initiating a filing for months in the hope a plea agreement that resolves the issue can be reached. Moreover, there is a steep learning curve in preparing the needed motion and most prosecutors see these cases only infrequently so that the time and effort needed to prepare an initial filing is not insignificant, causing further delay. The specification of a high standard of proof at civil forfeiture hearings,¹⁶ equivalent to that needed to terminate parental rights, means these actions are complex and time consuming for everyone involved, including the judiciary.

Increasingly, the animal shelters and rescue organizations that formerly assisted by housing seized animals are unable to do so because of the length of time animals are legally required to stay in care and the unreimbursed costs associated with such care. As a result, it is not unusual for animals to be left in or returned to inadequate or inhumane conditions simply for lack of another housing option for them.

Division of Animal Welfare

The Division of Animal Welfare was created within the Department of Public Safety (DPS), an executive-branch agency. It employs a Director whose sole authority and responsibility currently is the production of the Plan contained within this Report. The Division's only funding source is a \$2-per-dog-license surcharge enacted in 2024, which generates approximately \$128,000 annually. This amount falls short of the approximately \$160,000 needed each year to cover the Director's salary and benefits and the Division's current basic operating costs, not including the time cost for DPS staff to assist as needed with administrative support.

Conclusion

Taken together, a review of Vermont's current animal welfare framework demonstrates reliance on a patchwork of outdated statutes, limited resources, and informal practices that too often leave preventable harm unaddressed and cruelty unprosecuted. Gaps in the law, constrained access to veterinary and supportive services, fragmented reporting and enforcement pathways, and the absence of sustainable housing and funding mechanisms combine to undermine both animal welfare and public confidence in the system. At the same time, the information available to assess the true scope, cost, and outcomes of animal cruelty response efforts is incomplete, making it difficult to align resources with need. These findings underscore the necessity of a coordinated, data-informed, and incremental approach to reform that

¹⁵ See 13 V.S.A. § 354(d)–(h) for the current civil forfeiture process.

¹⁶ By default, civil matters in Vermont are decided based on a preponderance of the evidence standard, so that if a fact is more likely true than not (> 50% certainty), the burden is met. In contrast, the civil forfeiture statute applicable to seized animals requires that the State establish "by clear and convincing evidence that the animal was subjected to cruelty, neglect, or abandonment", 13 V.S.A. § 354(f)(1), which is typically regarded as representing ~80% certainty.

strengthens prevention, improves consistency and accountability, and builds durable capacity across agencies, municipalities, and nonprofit partners.

PART 2: PLAN FOR REDUCING ANIMAL NEGLECT AND CRUELTY

An effort to develop an efficient animal cruelty response starts with prevention. As long as there is widespread neglect, cruelty itself is hard to see, overwhelming in scope, and difficult to address. Developing resources to reduce neglect and prevent cruelty when possible narrows the scope of the needed response. As a result, this Part emphasizes prevention to head off irrevocable or extreme harm when possible.

Consistent with the principles articulated earlier in this Report, it begins from the premise that ensuring animals are treated non-cruelly is both an ethical obligation and a core function of a humane community. Establishing clear and appropriate minimum standards of care, combined with education and access to community-based resources, enables most animal owners to meet their humane treatment obligations without involvement of the criminal justice system.

This approach also recognizes the inextricable link between human welfare and animal welfare. Because animals often play a central companionship role in people's lives, preserving the human-animal bond by keeping pets in safe, even if economically vulnerable or otherwise unstable, homes benefits animals, their caretakers, and society as a whole. When neglect arises from poverty, lack of access to veterinary services, housing instability, or other human vulnerabilities, it benefits everyone if solutions are embedded in broader community support systems.

In addition to reducing animal suffering, prevention-focused strategies reduce economic costs to the State, municipalities, nonprofit organizations, and the public. It is significantly less expensive to provide adequate resources upfront than it is to address the consequences of prolonged neglect or cruelty, including emergency medical treatment, behavioral rehabilitation, long-term sheltering, and rehoming following abandonment, surrender, or seizure. Providing needed resources, such as low-cost or no-cost spay/neuter services, accessible veterinary care, access to pet food, and emergency pet housing options, can reduce or eliminate otherwise high costs that only exist because of the occurrence of cruelty.

Research supports this prevention- and resource-centered approach.¹⁷ Studies demonstrate that enforcement strategies emphasizing access to community resources can be effective at addressing all but the most serious cases of animal neglect, with a criminal enforcement response needed only for the most egregious or emergent cases.

Update Minimum Care Standards

Understandings of animal welfare have advanced significantly in recent years. Modern research recognizes that many animals have the capacity to experience pain, distress, fear, and pleasure and, thus, emphasizes the importance of setting appropriate care expectations. Vermont's minimum care standards do not always reflect these developments and in some cases are unclear, making it difficult for owners to comply

¹⁷ This is the most commonly cited best practice for addressing animal mistreatment across the fourteen states with dedicated animal welfare arms. See *Lessons Learned*, *supra* note 3. See also *Summary of Responses*, *supra* note 3.

with their care obligations and for enforcement officers to know whether there has been a violation.

Where minimum standards are unclear or insufficient, neglect may escalate to cruelty before effective intervention occurs. By the time resources are offered or animals are seized or surrendered, severe medical or behavioral harm may have already occurred, with associated increased burdens for housing and rehabilitation. Nonprofit animal shelters and rescue organizations in Vermont currently bear many of these costs.

Accordingly, this Report proposes that Vermont's minimum care standards be reviewed by the Director and the Advisory Board proposed in Part 5.

Build Preventive Programs

The following suggested programs are designed to prevent animal neglect and cruelty by improving access to care, stabilizing animals and owners during periods of crisis, strengthening education and compliance, and reducing reliance on criminal enforcement. Together, these programs support humane outcomes for animals, conserve limited enforcement resources, and increase capacity for owners to meet their care obligations.

Preventive programs are particularly well suited to philanthropic funding. While such funding is not typically sufficiently reliable to support core staffing or administrative overhead for a State Division, expanding community-based resources may be attractive to private donors and grant-making organizations. This Report therefore identifies potential grant opportunities and private donation mechanisms that could support the preventive resources suggested in this Part.

1. Expand access to affordable veterinary care.

Building targeted, preventive programs that increase access to veterinary care for Vermont animal owners would reduce animal suffering, help preserve the human-animal bond, and decrease reliance on law enforcement resources.

Potential strategies to improve access to veterinary care include:

- *Review veterinary practice laws and rules.* Vermont's veterinary practice statutes and regulations could be reviewed by the Director of Animal Welfare and Advisory Board, with opportunity for additional input from veterinarians at large and other stakeholders. This review could focus on identifying tasks trained non-veterinarians could safely and humanely perform that would expand access to basic care without negatively impacting public health or animal care. Vermont has already expanded access to euthanasia services through such an approach¹⁸ and could look for other such opportunities, including for rabies vaccination.¹⁹ In addition, this review could

¹⁸ See 17 V.S.A. § 1042 ("Euthanasia performed by licensed veterinarian or certified person").

¹⁹ Maine, for example, has adopted a statute allowing veterinary technicians under the indirect supervision of a veterinarian and certain laypersons to vaccinate animals against rabies in certain settings. See 7 M.R.S.A. § 3920 ("Certified rabies vaccinator").

include the possibility of expediting licensure pathways for out-of-state or foreign-trained veterinarians.

- *Increase spay/neuter capacity and funding options.*²⁰ Vermont could expand access to pet sterilization services by pursuing partnerships to provide advanced spay/neuter training to existing veterinarians to increase surgery availability and decrease cost, grants to nonprofit organizations for targeted spay/neuter efforts, and funding for animal control officers and entities with municipal contracts to sterilize stray animals and those seized or surrendered in cruelty cases. Donation-based funding mechanisms identified in Part 4 of this Report and private grants²¹ could support these efforts.
- *Provide low-cost or no-fee pop-up veterinary clinics in high-need areas.* Mobile or temporary clinics can efficiently deliver basic veterinary services in resource deserts.²² Product grants²³ may be available to supply vaccines for use on owned cats and dogs where there is no fee charged to the owner and access-to-care grants²⁴ could assist with the cost of establishing low-cost veterinary care options undertaken in partnership with a nonprofit entity.

2. Develop short-term pet housing options.

Establishing short-term emergency housing options for pets helps stabilize both human and animal outcomes.²⁵ Particularly for those pet owners staying in shelters that do not accommodate animals or unhoused individuals who have jobs and cannot safely leave their animal unattended in a vehicle or in a tent while working, these interventions

²⁰ Watch *Beyond Sheltering: Increasing Spay/Neuter Access*, available at https://www.youtube.com/watch?v=4oB_UTITOAE&t=30s, for more information about this approach.

²¹ Bissell Pet Foundation's *Fix the Future* program, for example, provides veterinary teams for intensive spay/neuter events focused on owned animals otherwise at high risk of unintentionally reproducing. See <https://www.bissellpetfoundation.org/programs/fix-the-future/> for more information.

²² For an example of such an approach, watch *Beyond Sheltering: Building Resources for a More Humane Community*, available at <https://www.youtube.com/watch?v=yOksAqOmh8I&t=56s>.

²³ Petco Love's *Vaccine Partner Program* is an example of such a grant. See <https://petcolove.org/shelter-partners/vaccine-information/> for more information.

²⁴ The American Society for the Prevention of Cruelty to Animals *National Shelter Grants Initiative*, <https://www.aspapro.org/grant/2024/09/18/2025-aspca-national-shelter-grants-initiative>, and PetSmart Charities' *Accelerator: Sustainable Low Cost Veterinary Care* grants, <https://petsmartcharities.org/pro/grants/improving-access-to-veterinary-care>, could be potential sources of funding for a public-private project in this area.

²⁵ Models for this sort of assistance exist, including the Atlanta Humane Society's *Pets in Crisis Program*. For more information, go to <https://atlantahumane.org/resources/pets-in-crisis-application/>.

support individuals seeking safety, healthcare, employment, or housing without being forced to relinquish their animals. Providing temporary housing for animals, especially where basic vaccinations and other wellness care can be provided, also reduces disease risk and increases public safety by ensuring that animals are properly contained when not attended by their owners.

Early identification and referral to these resources are critical. Coordination among animal welfare organizations, housing providers, social service agencies, and enforcement personnel ensures that resources are offered proactively before animals are left behind, conditions deteriorate, or situations escalate into enforcement or emergency responses.

As the Division of Animal Welfare develops, regional resource hubs could provide a coordinated way to deliver needed resources and services. These hubs could support temporary animal housing, disaster response, seizure triage and quarantine needs, and preventive program delivery while also serving as connection points to human services.²⁶ These hubs could also be linked to existing disaster response mechanisms such as the State Emergency Management Plan and local stakeholder groups.

Individuals experiencing crisis at times seek help for their animals before asking for help for themselves; co-locating pet support services with human services such as food distribution, vaccination clinics, supply drives, and referrals to housing and healthcare creates low-barrier opportunities for early intervention. An integrated approach reduces costs, improves compliance with care standards, and strengthens community resilience.

Animal housing at these hubs would remain strictly short-term. The goal would be to return animals to their owners, transfer them to adoption partners, or place them in appropriate farm or sanctuary settings as quickly as possible. Care could be provided by trained volunteers or paid interns²⁷ under professional supervision, creating workforce development opportunities while maintaining animal health and sanitation standards.

To promote sustainability, each hub could incorporate a complementary income-generating function aligned with regional needs, such as a pet animal import inspection center, a low-cost spay/neuter and wellness clinic, or dog daycare and training services.

²⁶ Harris County Public Health (<https://publichealth.harriscountytx.gov/>), Knights Landing One Health Center (<https://knightslandingonehealth.com/>), and Washington Health Outreach (<https://www.wahealthoutreach.org/>) are examples of community centers that serve both human health and other services and pet veterinary needs. Funding for these centers is provided by a combination of public and private sources.

²⁷ Developing a program similar to that of Hand2Paw, which provides paid internships caring for vulnerable animals as job training for at-risk youth, could provide some of the employees needed for these services. See <https://hand2paw.org/> for more information about this program.

Initial capital funding could come from private sources identified in Part 4, supplemented by grants such as those available through the USDA's *Community Facilities Direct Loan & Grant Program*²⁸ and Red Rover's *Safe Housing Grants*.²⁹

3. Provide humane education.

In many instances, humane education can prevent harm, increase compliance, and reduce recidivism.

- *Children.* Humane education could be classroom-based or through extracurricular programs that teach responsible pet ownership and safe human-animal interactions (including dog bite prevention) while simultaneously increasing literacy and learning skills. Existing models, such as CASA PAWS³⁰ and Animal Friends,³¹ provide blueprints for developing approaches that could be adapted for Vermont.
- *At-risk young adults.* The Division of Animal Welfare could develop or coordinate a program modeled on Hand2Paw,³² combining paid internships serving vulnerable animals with workforce development and life skills training for at-risk youths.
- *New and small-scale homesteaders.* Educational resources for agricultural animal owners could be expanded through partnerships with agricultural nonprofits. Given that approximately one-third of the cruelty complaints investigated in 2024 in Vermont involved neglect of agricultural animals³³ with many likely rooted at least in part in lack of knowledge, building these educational resources could help support rural Vermonters while preventing unnecessary animal suffering.
- *Offenders.* Humane education classes may help in achieving compliance. Programs such as the Animal Welfare Class developed by Director Milot in Athens, Georgia, have demonstrated that such programs can significantly reduce recidivism with respect to neglect and allow enforcement resources to focus on cases where compliance is least likely without escalating to law enforcement.

Improve Access to Information About Resources

The Division of Animal Welfare could host and maintain a centralized, publicly-accessible listing of animal welfare resources, including pet food pantries, hay assistance programs, emergency housing and temporary fostering options, and low cost spay/neuter and wellness services. Centralizing this information would improve access for animal owners, facilitate early intervention, and support consistent referral practices by enforcement personnel and human service providers.

²⁸ See <https://www.rd.usda.gov/programs-services/community-facilities/community-facilities-direct-loan-grant-program-14>.

²⁹ See <https://redrover.org/relief-dv/dv-safe-housing-grants/>.

³⁰ See <https://www.casatransport.org/education>.

³¹ See <https://thinkingoutsidethecage.org/programs-services/humane-education/>.

³² See *supra* note 27 for information about this program.

³³ See *supra* part 1, *Current Status*, for more information about 2024 complaints and cases.

In addition, animal welfare specialists could be included on Vermont's Public Safety Enforcement Teams (PSETs) that integrate law enforcement and human services to address complex, community-level challenges. Because animal neglect often co-occurs with housing instability, domestic violence, and other human vulnerabilities, integrating animal welfare experts into PSETs would support earlier intervention and more comprehensive solutions, improving outcomes for both animals and people.

Conclusion

Together, the measures outlined in this Part establish a prevention-first framework that strengthens minimum care standards and invests in community-based programs to address the root causes of animal neglect that, unchecked, become cruelty. This approach reduces animal suffering, preserves the human-animal bond, and makes more efficient use of limited public and nonprofit resources.

In connection with each of these programs, this Part identified specific potential sources of private funding or models for adaptation. In many cases, funding available through donations or grants may cover the cost of products and services but not professional management. Carefully designing programs to achieve Vermont's animal welfare goals while qualifying for private funding could leverage a relatively modest investment in Division of Animal Welfare staff into a substantial positive impact.

PART 3: PLAN FOR ANIMAL CRUELTY RESPONSE

This Part proposes a uniform and clear process for responding to potential animal cruelty complaints through (1) centralized reporting of complaints alleging cruelty, with review of responses by the Director of Animal Welfare; (2) development of regional Animal Cruelty Response Units (ACRUs); (3) staffing of the Division of Animal Welfare with a core group of professionals, as described in Part 4, capable of assisting ACRUs as requested or taking responsibility for leading investigations, as appropriate; and (4) increasing of short-term animal holding capacity for use during triage, quarantine, and legal hold periods. Because these reforms will not occur instantaneously, it contemplates a transitional period during which responsibilities are gradually shifted to the Division as resources are made available and expertise is developed.

Standardized Reporting

The goal of a reporting system is to provide an easily-accessible and clear point of contact for reporting complaints, transferring information about the complaint efficiently to the appropriate responder, providing a competent and standardized response, and allowing for oversight of the report and response.

This Plan proposes that all reports of nonemergency potential animal cruelty be made through nonemergency law enforcement dispatch for the jurisdiction. Standard operating procedures would be developed by the Director of Animal Welfare and responding agencies to ensure uniform and appropriate responses.

Dispatch would forward the report both to the appropriate law enforcement division for the jurisdiction and to the Director of Animal Welfare. If an animal control officer, constable, or agency without response authority receives a complaint alleging facts that could be animal cruelty, the person or agency should coordinate response to the complaint with the agency with law enforcement responsibility for the jurisdiction with notice to the Director of Animal Welfare. Where the Department of Fish & Wildlife (DFW) or an individual Warden receives an animal cruelty complaint directly, information about the case should be forwarded to the Director of Animal Welfare even if a case is not ultimately opened.

At such time as there is a Division of Animal Welfare website, it could host a complaint portal providing for both anonymous and non-anonymous reports, with reports forwarded to the appropriate responding agency for the jurisdiction.

Provide for Robust Civil Response

Many nonemergency animal welfare concerns arise from lack of resources, lack of knowledge, or inertia, not intentional harm. As a result, civil responses are a critical tool for reducing animal neglect and preventing cruelty. These mechanisms allow the State to intervene early, set clear expectations, connect owners with resources, motivate owners when necessary, and verify compliance before animals suffer extreme harm. By resolving appropriate cases in these ways, the State can preserve the human-animal bond, reduce unnecessary criminalization, and reserve limited law enforcement resources for the most serious, willful, or repeated cruelty cases.

Humane officers³⁴ associated with an ACRU or employed by the Division of Animal Welfare should serve as the initial responders for complaints involving neglect or potential animal cruelty whenever possible. They could be required to document conditions and connect owners to relevant resources when appropriate and be authorized to apply for inspection or search warrants and empowered to intervene to prevent an act of mistreatment. Where violations are present but compliance is deemed possible and appropriate, they could be empowered to issue written warnings and civil tickets, enter into individualized compliance plans, assess fines, issue cease-and-desist orders, file injunctions, impound animals for a pre-determined time period while conditions are improved, and ensure compliance was timely achieved. Humane officers should escalate the case to sworn law enforcement where appropriate and serve in a support role and as a subject matter expert during any sworn law enforcement-led cruelty investigation and prosecution phases.

Animal control officers who are not humane officers should continue to respond to complaints concerning local ordinances and animal bites, referring state-level neglect or possible cruelty complaints to a humane officer and assisting in initial investigations and compliance efforts. The Division of Animal Welfare could provide certification and annual continuing education for animal control officers to ensure professionalism and consistent protocols.³⁵ Minimum qualifications and an oversight framework could be established based on recommendations from the Director of Animal Welfare and Advisory Board described in Part 5.³⁶

Under this approach, humane officers would serve as front-line responders for non-emergent cases, compliance efforts, and resource coordination, escalating matters to law enforcement only when this approach proves unsuccessful or conditions indicate that immediate escalation is needed.

Role of Law Enforcement

Sworn law enforcement officers should assume responsibility for investigating animal cruelty complaints when preventive and civil strategies are unsuccessful, as well as in cases involving severe or persistent harm, immediate risk to animal life or public safety, or indicia of co-occurring crimes against humans. These responsibilities are not new; law enforcement agencies already respond to many emergent or egregious cruelty cases. However, the current system lacks the training, infrastructure, and coordination needed to ensure consistent, humane, and legally-sound outcomes.

³⁴ See 13 V.S.A. § 351(4)(B) for the definition of a humane officer. Since a 2024 revision, this definition no longer includes humane society staff or most animal control officers.

³⁵ At present, Vermont has no training requirements for animal control officers. See https://www.maine.gov/dacf/ahw/animal_welfare/aco-resources.shtml for Maine's approach and requirements.

³⁶ Currently there are no statewide qualifications for animal control officers so that even someone with a prior conviction for animal cruelty or a related crime against humans could so serve. Moreover, there is no outside review of whether or how complaints are investigated by animal control officers.

Under the proposed framework, sworn law enforcement officers would not be displaced. They would be repositioned as emergency and escalation partners rather than serving as a default responder in most cases. In this way, limited law enforcement time and resources would be reserved for the most egregious and time-sensitive cases.

Strengthening Vermont's Animal Cruelty Response System

An effective animal cruelty response system needs to have the support and participation of the involved law enforcement agencies. It is not efficient, cost effective, or necessary at this time for most responding personnel to be employees of the Division of Animal Welfare. Instead, this Plan proposes that trained personnel, following collaboratively-developed standard operating protocols and sharing an expanded pool of resources, have access to training, support, and guidance from the Division, with a small number of key personnel employed as members of the Division itself, as described in Part 4.

1. Establish regional response units.

This Plan proposes establishing regional Animal Cruelty Response Units (ACRUs) for efficient use of limited resources, consistency in approach, and coordination across agencies. ACRUs would function as multidisciplinary response and investigation teams composed of sworn law enforcement officers, State's Attorneys, humane officers, human services professionals, veterinarians, and trained volunteers, deployed as needed to respond to severe neglect or cruelty complaints. They would work on potential cruelty cases under the guidance of the Division of Animal Welfare.

ACRU humane officers would serve as first responders for most of the calls, though for emergent cases and those involving crimes against humans sworn law enforcement officers would take the lead. Other team members would be included on an as-needed basis. Humane officers would escalate cases to sworn officers according to collaboratively-developed protocols.

In recognition of the complexity of creating a new, multidisciplinary, cross-jurisdictional response model especially where there are no funding mechanisms in place, this Report recommends an incremental, planning-first approach rather than immediate implementation.

Specifically, this Report proposes that a formal working group be appointed and charged with developing an ACRU proposal over a six-month period following adoption of this recommendation. The working group could include the Director of Animal Welfare and representatives from Vermont State Police, DFW, local police departments, and the Department of State's Attorneys and Sheriffs.

The working group could be tasked with determining the appropriate number and structure of the ACRUs and their regional boundaries; defining roles and command protocols to ensure clarity and avoid jurisdictional confusion; assessing training needs and minimum qualifications for participation; inventorying existing infrastructure, personnel, and partnerships that could be leveraged; developing cost estimates and funding proposals; and recommending statutory, regulatory, and policy changes needed to support implementation.

Even though slower than many advocates will want, this approach would allow Vermont to build a coordinated and efficient animal cruelty response system deliberately, collaboratively, and based on real operational needs and available resources.

2. *Improve expertise.*

While current Police Academy training provides a solid foundation for investigating animal cruelty complaints, specialized expertise and support is often needed. Law enforcement officers responding to these cases should either possess advanced training themselves or have ready access to humane officers and veterinarians who can assist with assessment, documentation, and case development.

This Plan proposes that the Division of Animal Welfare assist in providing advanced animal cruelty trainings³⁷ to State and local law enforcement officers who opt to lead cruelty investigations. These trainings could include evidence collection, species-specific care standards, and an understanding of the ways animal cruelty intersects with domestic violence, child abuse, elder abuse, gang activity, and drug offenses.

In return for opting into this training, officers could be eligible for Animal Welfare Fund support for the costs of evidence collection, rehabilitation, and housing for animals seized in connection with their investigations, assuming a funding source is provided for this as suggested in Part 4.

The Division could also develop specialized animal cruelty training for State's Attorneys, the judiciary, and Vermont lawyers generally to improve case efficiency, as well as restarting optional animal cruelty trainings for veterinarians.

Additionally, the Division could establish certification programs for volunteer fosters and transporters willing to assist with housing, caring for, and transporting animals that remain subject to legal holds. Training would include standard operating procedures for ongoing evidence documentation, confidentiality requirements when caring for living evidence, and a clear understanding of when and how animals must be returned if title is not relinquished or judicially forfeited. The Division would maintain a database of these volunteers for use by enforcement officers as needed.

At least some of this training may be supported by grants. The Animal Legal Defense Fund,³⁸ for example, provides no-fee training for law enforcement, prosecutors, judges, and veterinarians and has expressed an openness to considering an application from the Division of Animal Welfare as a potential *Collaborative Response Project* partner,³⁹ even though such partnerships have previously been on a municipal level. Humane World for Animals has also indicated a willingness to expand its trainings in Vermont, including by adding a section on agricultural animals.

³⁷ A description of such training can be found in 20 V.S.A. § 2365b(b) and (c).

³⁸ See https://aldf.org/how_we_work/criminal-justice/.

³⁹ For more information on this program, see <https://aldf.org/article/collaborative-response-project/>.

3. Improve processes.

As described above, this Plan proposes that the initial response to many cruelty complaints be provided by humane officers. These nonsworn officers would work to resolve animal welfare concerns through education, resource referral, and compliance and other civil means, and determine whether escalation to sworn law enforcement is necessary. Standard operating procedures for these responses could be developed collaboratively by the Director of Animal Welfare, humane officers, and law enforcement.

When a case is escalated to law enforcement, or when law enforcement serves as the initial responder due to severity, emergent circumstances, or the co-occurrence of another crime, the investigation should be led whenever possible by an officer who has completed advanced training, following protocols developed jointly by law enforcement and the Director of Animal Welfare.

To improve coordination, the Director would be notified whenever a potential cruelty case is opened by law enforcement and review it for Division involvement. Where funding is available and the investigation is led by an officer with specialized training, the Division would assume responsibility for advancing care expenses to the extent possible and for coordinating with the appropriate State's Attorney's Office on restitution requests.

4. Increase impound options for seized animals.

A functional cruelty response system requires sufficient humane and legally-appropriate options for housing animals during investigations and legally-mandated hold periods. Currently, space issues are one of the primary chokepoints for effectively dealing with cruelty cases. With no public shelters and very limited space available through private animal shelters, rescue organizations, sanctuaries, and private individuals, animals are at times left in inadequate living conditions simply because there is nowhere to house them if seized.

- *Better utilize existing holding space.* Adopting a more efficient approach to title forfeiture for seized animals would allow existing housing for animals to be better utilized. Similarly, pet animals impounded as strays or in noncriminal seizures are currently held for inconsistent and often lengthy periods of time in Vermont despite evidence that most reclamations occur do so within three days. Establishing a default holding period for these animals would provide clarity while respecting property rights.

The streamlining of legal processes through these two changes would allow existing holding spaces to be reused within days or weeks instead of months or years without jeopardizing an owner's constitutional rights.

- *Build additional short-term holding space.* The Director of Animal Welfare could work with municipalities to identify existing spaces appropriate for use as short-term holding options for triage, quarantine, and legal hold periods. Care of the animals

could be supported by trained volunteers and paid interns⁴⁰ under professional oversight in a disaster-response model.⁴¹

For pet animals, options include purchasing popup kennels and mobile crates for use at identified facilities, including the Division resource hubs described in Part 2 and municipal buildings when and where space is available. For agricultural animals, partnerships with technical schools and fairgrounds may provide appropriate capacity.

- *Coordinate large seizures with national animal welfare groups.* Some national animal welfare organizations have divisions trained to assist with larger animal seizures, participating in impound and evidence collection and taking possession of the seized animals and responsibility for the associated costs of care.⁴² For this assistance, the assisting organization needs to be involved from the time the decision to seek a search warrant is made. The Division of Animal Welfare could assist in applying for such assistance when appropriate and help is requested or when leading an investigation.

5. *Provide funding for rehabilitating and housing case animals.*

The costs of evidence collection, rehabilitation, and housing the animals involved in cruelty cases frequently exceed \$1,000 per animal and can be far higher for large animals or those requiring intensive or long-term care. While restitution is theoretically available, in practice it is often unpaid or payments are spread over years requiring a caretaker to front the costs for a significant period of time.

This Plan proposes establishing a reliable revenue stream for the Animal Welfare Fund sufficient to advance these expenses when animals are impounded by humane officers or trained sworn law enforcement officers. The Director would then submit restitution requests to the appropriate State's Attorney's Office and work with the Restitution Unit of the Vermont Center for Crime Victim Services for collection of these amounts. In addition, the Director could pursue grant funding whenever possible to offset associated costs.⁴³

⁴⁰ See, *supra*, note 27, for information about this approach.

⁴¹ Vermont Disaster Animal Response Team, for example, trains teams of volunteers and stages needed equipment for disaster response around the State. See <https://vermontdart.org/>. VDART has expressed a willingness to collaborate on care needs for seized animals using this infrastructure.

⁴² See <https://www.humaneworld.org/en/issue/animal-rescue-and-response> and <https://www.aspca.org/investigations-rescue/rescue-work-and-field-deployments> for information about two such resources.

⁴³ The Animal Legal Defense Fund, for example, will provide grants of up to \$5,000 for animal seizure costs where criminal charges are being pursued. See https://aldf.org/how_we_work/criminal-justice/.

Conclusion

The reforms described in this Part are intended to move Vermont toward a more coherent, humane, and effective response to animal cruelty that emphasizes prevention and civil intervention where possible, escalates appropriately to criminal enforcement when necessary, and ensures that animals involved in investigations are treated as living beings rather than inert evidence. By clarifying roles, developing regional response capacity, strengthening training, improving coordination and processes, and expanding humane impound options, Vermont can achieve more consistent outcomes while making better use of limited funds and law enforcement resources.

PART 4: PLAN FOR STAFFING NEEDS AND FUNDING SOURCES

The proposals set forth in Parts 2 and 3 are designed to improve animal welfare in Vermont by reducing and preventing harm and ensuring that animal cruelty is addressed professionally, consistently, efficiently, and humanely. Achieving these outcomes, however, depends not only on sound policy design but on the State's capacity to staff and implement the proposed reforms.

This Part examines the minimum staffing needs associated with establishing a functional Division of Animal Welfare and evaluates potential funding source options to support both core operations and targeted programs. Consistent with the principles articulated earlier in this Report, the approach emphasizes incremental implementation, shared responsibility, transparency, and alignment between sources of funding and the activities they support. The goal is not to build an unnecessary bureaucracy, but to ensure that Vermont has sufficient expertise, coordination, and resources to carry out this Plan in a durable and fiscally responsible manner.

Staffing Needs

Every state with a dedicated animal welfare division employs, at a minimum, a Director, one or more sworn investigators, enough inspectors to oversee pet animal industries, and administrative staff. Some have one or more veterinarians or a dedicated prosecutor. By contrast, Vermont's Division of Animal Welfare has only a Director.

Among states with such divisions, Delaware most closely matches Vermont's population. It uses a centralized staffing model, with approximately 45 employees in its Office of Animal Welfare (OAW). The OAW handles almost all pet animal matters internally, including cruelty investigations, industry oversight, animal control, and lost pets; it is not responsible for investigating cruelty involving agricultural animals. It contracts with a private shelter for its animal impound and housing needs. However, Vermont's current fiscal constraints and the uncertainty around what is needed makes a model such as Delaware's impractical at this time.

Colorado and Maine provide additional possible models for Vermont given their population density and their mix of small urban centers and vast rural areas. Colorado's Division of Animal Welfare employs a Director, a manager for the Bureau of Animal Protection (BAP), two investigators, a veterinarian dedicated to animal cruelty investigations, ten pet animal industry inspectors, and an administrative assistant. It partners with local law enforcement and nonprofit-employed investigation teams when appropriate. Maine's Animal Welfare Program includes a Director, a veterinarian, six humane agents, and two office staff members, while relying on sworn officers from other state and municipal agencies to investigate most cruelty cases.

	land mass (sq. miles)	population*	pop. density (pop./sq. mile)	pop./ VT pop.	division staffing
Delaware	1,949	1,051,917	540	1.6	~45 employees
Colorado	103,642	5,957,493	57	9.2	15 employees
Maine	30,843	1,405,012	46	2.2	10 employees
Vermont	9,217	648,493	70	n/a	1 employee

* All population data is from U.S. Census Bureau, State Population Totals and Components of Change: 2020-2024, available at <https://www2.census.gov/programs-surveys/popest/tables/2020-2024/state/totals/NST-EST2024-POP.xlsx>.

As discussed in Part 3, the precise number and composition of staff needed for Vermont's Division of Animal Welfare to effectively reduce neglect and cruelty and coordinate cruelty responses is not yet known. As a result, this Plan envisions that many early staffing needs will be met through contractual and interagency arrangements, particularly with agencies participating in staffing the Animal Cruelty Response Units (ACRUs) described in Part 3.

While it may not be immediately feasible, a minimum effective staffing model for the Division of Animal Welfare would include:

- A Director;
- A veterinarian,⁴⁴ available at least part-time, with forensic training and a broad range of animal welfare knowledge, including the needs of both large and small domestic animals;
- At least one humane officer to support preventive, civil, and compliance-based responses; and
- Part-time access to a sworn law enforcement officer, fulfilled through a shared position, loaned from another state division, or overtime arrangements with a small team of trained officers from existing law enforcement divisions who are willing to assist when needed.

In addition, the Division will require administrative support on an as-needed basis along with access to IT and accounting services. Funding must account not just for salary cost but office space, equipment, vehicles, website hosting, and expense reimbursement.

As noted in Part 3, staffing needs would be refined as part of the ACRU working group process, since the number and nature of Division employees will depend on the

⁴⁴ While it is often assumed that the State Veterinarian, employed by the Vermont Agency of Agriculture, Food & Markets, is available to help with cruelty cases, that is not the case in most instances. While she may assist with triage of larger agricultural animal cases at times, that is not routine and she is not available to assist with pet animal cases or with analysis of veterinary case evidence.

functions ultimately performed by the response units and the extent to which responsibilities are shared with partner agencies.

Funding Source Options for Staff and Overhead

In peer states, animal welfare divisions are typically funded through a combination of General Fund appropriations, pet food registration fees, and industry licensing fees. Given Vermont's current fiscal environment, this Report does not recommend funding through the General Fund or by imposing new or increased taxes or fees. Instead, it identifies several alternative mechanisms that better align funding sources with the activities they would support or that close existing compliance gaps.

1. Redirecting part of the current cat and dog food and supplement product registration fee.

Cat and dog food and supplement product registration fees are a common type of special-purpose fee used to fund animal welfare divisions. Special-purpose fees are generally assessed where the individuals and entities subject to the fee impose unique costs due to their activities or where the proceeds fund programs that primarily benefit those paying the fees.

In the case of Vermont, there is already a \$105 per product fee assessed on cat and dog food, cat and dog food supplements, and dosage form cat and dog health products.⁴⁵ This fee is paid to the Vermont Agency of Agriculture, Food & Markets (VAAFM) and is in addition to registration fees charged for comparable agricultural animal products and products for pet animals other than cats and dogs.

While historically VAAFM had a variety of roles with respect to cats and dogs, it currently performs almost none of those functions.⁴⁶ The tasks it performs with respect to cats and dogs are limited to oversight of the Euthanasia Board for Animals and co-authority for determining the form and processes of rabies vaccination and quarantine with the Vermont Department of Health.

The special-purpose fees for cat and dog food products and supplements received by VAAFM in 2024 were \$1,326,360.⁴⁷ These are only the fees received on food

⁴⁵ See 6 VSA § 324 ("Registration and fees").

⁴⁶ VAAFM has responsibility for administering pet shop licensing laws, but these stores may no longer sell cats or dogs. It also oversees cat and dog auctions, which it reports do not occur but, in any event, it disclaims appropriateness of oversight by the Agency since they involve nonagricultural animals. It may petition for custody of animals in possession of persons convicted of violating general animal welfare laws, which authority it reports it has never exercised. It has discretionary authority to inspect and quarantine pet dealers and can establish import requirements for cats and dogs, but reports that it does not exercise these powers. It formerly adopted rules concerning oversight of animal shelters and rescue organizations but ceased licensing and inspecting them approximately 15 years ago. See Act 147 Section 38 Report, *supra* note 2.

⁴⁷ This excludes registration fees for agricultural animal products, fees for food & supplement products for pet animals other than cats and dogs (\$140,280 in 2024),

products and supplements that are exclusively for cats and dogs and thus largely unrelated to services provided by VAAFM. This item does not propose instituting a new fee, but better aligning the constituency indirectly paying an existing fee—dog and cat owners—with costs imposed and services needed.

While sensitive to the fact that once a revenue stream is allocated to an agency it becomes part of its anticipated funding sources, redirecting a portion of these proceeds, perhaps phased in over time, to the Division of Animal Welfare would match the constituency paying these targeted fees with the purposes they support. It would also enable the Division of Animal Welfare to assume responsibility for overseeing the response to cruelty complaints without increasing the tax burden on Vermonters.

Administrative costs would be minimal as registration and enforcement mechanisms already exist.

2. *Improve income and sales tax compliance rates with respect to pet sales.*

Improving tax compliance rates for amounts due from sales of cats and dogs could increase revenue while promoting fairness and legal compliance. This is not proposing a new tax; it is collecting amounts already owed but currently unpaid.

It is well-established that tax compliance is low when income is received from cash, online, or informal sales.⁴⁸ Because cat and dog sales no longer occur at established pet shops in Vermont and there is no oversight of breeders or individuals or entities operating as rescue organizations to ensure they are 501(c)(3) organizations, it is likely that many sellers are not currently paying taxes due under existing Vermont law on their activities.

A search of online sites⁴⁹ shows substantial puppy selling activity in Vermont. With most listed prices ranging from \$2,000-\$3,000 per puppy, a single litter can produce a sales tax obligation of \$1,000 or more as well as income tax obligations. It is unlikely that much of this is currently being collected.

HM Revenue & Customs, the United Kingdom's tax authority, has recently begun an education and information-gathering campaign on cat and dog breeders to increase tax

products for a mix of animal types potentially including cats or dogs (\$55,755 in 2024), and for dosage form pet health products including those for cats and dogs (\$24,850 in 2024).

⁴⁸ Fifty-five percent of the tax due from “low visibility” income is estimated to be unpaid. See Internal Revenue Service, *Research, Applied Analytics & Statistics: Tax Gap Projections for Tax Year 2022*, Pub. 5869 (Rev. Oct. 2024) at 5, available at <https://www.irs.gov/pub/irs-pdf/p5869.pdf>. Estimates of sales tax gaps range from 5%-20.9% with more than half of the gap coming from smaller businesses (those grossing less than \$500,000 a year in sales). See Cary Christian & Steven Purcell, *Leveraging Big Data Analytics and AI to Combat the Sales Tax Gap*, TaxNotes (Dec. 12, 2022), available at <https://www.taxnotes.com/featured-analysis/leveraging-big-data-analytics-and-ai-combat-sales-tax-gap/2022/12/08/7ff2t>.

⁴⁹ These include Puppies.com, Craigslist, and social media rehoming sites.

compliance.⁵⁰ The Division of Animal Welfare could work with Vermont's Department of Taxes on a similar awareness effort with any resulting increase in tax revenue from these sources directed to the Animal Welfare Fund.

It is not currently possible to estimate the revenue receivable from this approach since there is no data on non-retail store pet sales in the State.

3. Dog licensing fees.

Dog licensing fees could better support the Division of Animal Welfare through:

- Reallocating portions of existing surcharges; and
- Improving compliance through online licensing, reminders, partnerships, and incentives.

This option is not a proposal to increase the current licensing fee but suggests redirecting it so that the constituency paying the fee—responsible owners of rabies-vaccinated dogs—and the services provided are aligned and considering programs to improve compliance with existing law consensually.

Currently, \$1 from each dog license sold is directed to rabies-prevention programs run by other agencies that, at most, minimally affect dog owners whose pets are rabies vaccinated (as all licensed dogs are⁵¹). Directing this special-purpose fee to the Division of Animal Welfare to support programs concerning pet animals would better align it with the constituency responsible for paying it and provide approximately \$64,000 each year towards the Division's operational costs.

Additionally, approximately 64,000 dogs are licensed each year in Vermont, yet low-end estimates show that there are at least 98,000 dogs in the State.⁵² Thus, the current compliance rate with the licensing program is no better than 65%.

Other jurisdictions have had success increasing licensing rates to 80% or more without using punitive measures by enabling online licensing⁵³ as well as allowing it to continue in-person, sending automated reminders of deadlines, and partnering with

⁵⁰ See, e.g., <https://www.tax.org.uk/hmrc-one-to-many-letter-dog-and-cat-breeders-downstream>, discussing the HMRC campaign to improve income tax compliance by breeders that started in 2024.

⁵¹ A dog owner is required to show that their pet has been inoculated against rabies to obtain a license. See 20 V.S.A. § 3581a (“Immunization”).

⁵² According to 2016 estimates of dog ownership, there are 98,000 owned dogs in Vermont. See World Population Review, *Pet Ownership Statistics by State*, available at <https://worldpopulationreview.com/state-rankings/pet-ownership-statistics-by-state> (showing that in 2016, 28% of Vermont households had a dog with an average of 1.3 dogs per dog owning household) and U.S. Census Bureau, *Families & Living Arrangements, 2019–2023*, available at <https://www.census.gov/quickfacts/fact/table/VT/HSD410223 - HSD410223> (269,466 households in Vermont).

⁵³ Typically, these programs include a convenience surcharge to cover the cost of online processing.

veterinarians and animal placement organizations to provide information about the licensing requirement and how to comply at the time a rabies vaccination is administered or a dog is adopted. Less commonly but highly successfully, some jurisdictions have established incentive programs, partnering with businesses to provide frequent purchaser status or discounts to licensees.⁵⁴

Increasing compliance in this way could yield approximately \$68,000 annually, with the additional benefit of providing additional funding for the Vermont Spay/Neuter Incentive Program (VSNIP). VSNIP receives a \$4 surcharge from each license sold (except for those purchased by large breeders)⁵⁵ to provide sterilization vouchers for low-income Vermont dog and cat owners.

The administrative costs of this funding stream are moderate. While mechanisms for dog licensing are in place, information protocols and managing the partnership program would require oversight.

Funding Sources for Preventive Programs

Donations and grants are generally insufficient in amount and too unreliable to fund core animal welfare division operations but can meaningfully support targeted preventive programs.

Potential philanthropic funding sources in addition to those mentioned in connection with specific programs described in this Report include an animal welfare specialty license plate, a donation line item on state income tax returns, and direct solicitation of private gifts and grants.

1. Specialty license plate.

Specialty license plates in other states generally generate a modest, but not trivial, amount of revenue for animal welfare. While specifics are not available for proceeds from some such programs, Colorado (\$650,000), Maine (\$125,000), and Massachusetts (\$175,000) all make their data available. Once those figures are adjusted to account for population differences, Vermont could expect to raise \$16,000-\$70,000 annually for the Division if it adopts an animal welfare license plate.

2. Donation line item on state income tax returns.

Like specialty license plates, inclusion of a donation line item on income tax returns typically yields a small total funding amount. However, many states provide this option to help fund animal welfare activities. Maine (\$25,000), Massachusetts (\$400,000), and Colorado (\$200,000) all utilize this approach. Once adjusted for differences in population between Vermont and these states, Vermont could expect to raise \$11,000-\$36,000 each year from this source were it available.

⁵⁴ See, for example, Toronto's BluePaw Partners program, <https://www.toronto.ca/community-people/animals-pets/pet-licensing/bluepaw-partners/>.

⁵⁵ See 20 V.S.A. § 3581(c)(1) (establishing the surcharge) and 20 V.S.A. § 3583 (exempting licenses for dogs and wolf-hybrids kept for breeding purposes from the 20 V.S.A. § 3581 surcharge, as well as any local licensing surcharge).

3. Solicitation of private donations.

Tax-deductible donations could be directly solicited by the Division. These amounts are unlikely to be steady or predictable though, particularly in the case of donations from the estates of high-net worth individuals. However, outreach to estate planning attorneys and financial planners could yield substantial benefits over time.

Conclusion

The staffing and funding strategies outlined in this Part are intended to provide Vermont with the capacity to implement the Plan described in this Report in a manner that is deliberate, transparent, and fiscally responsible. By better aligning funding sources with the activities they support, and by increasing staffing incrementally as data and experience accumulate, Vermont can strengthen its animal welfare system without overcommitting resources or imposing unnecessary burdens on the public.

PART 5: PLAN FOR LEGISLATIVE REVIEW

The recommendations set forth in this Report contemplate significant improvements to Vermont's animal welfare system, including improved access to preventive resources and more effective responses to neglect and cruelty. Corresponding legislative action could improve their effectiveness by providing an updated approach, early warnings of pending problems, and linkage to human benefits. Moreover, Vermont's animal-related statutes have developed incrementally over decades, resulting in provisions that are dispersed throughout the Vermont Code, uneven in scope, and in some cases no longer well aligned with modern best practices or current institutional structures.

This Part proposes a structured, stakeholder-informed legislative review process to ensure that statutory changes are deliberate, coherent, and grounded in practical experience. Rather than advancing piecemeal amendments in isolation, this approach is intended to support coordinated reform, reduce unintended consequences, and allow Vermont's animal welfare framework to evolve in a way that is transparent, evidence-based, and integrated with governmental priorities.

Advisory Board

At present, the Division of Animal Welfare does not have an Advisory Board. Given the breadth of the Division's potential responsibilities and the importance of stakeholder trust and participation to its success, this Report recommends the establishment of an advisory structure.

Vermont already has a body—the Animal Cruelty Investigation Advisory Board⁵⁶ (ACIAB)—that includes representatives from many of the constituencies whose expertise and perspectives would be valuable to the Division of Animal Welfare, including law enforcement, prosecutors, veterinarians, animal welfare professionals, and pet animal industry participants.

If appropriate, the ACIAB's purpose could be expanded to include advising the Director of Animal Welfare. If this approach is taken, the ACIAB's duties should be expanded to include policy development, implementation challenges, legislative priorities, and development of a pet animal industry governance structure. The Board's members would likely either need to be increased in number or ad hoc members appointed for the purpose of serving on specific board subcommittees.

Alternatively, the ACIAB's purview could remain as it is with a new Advisory Board for the Division established.

Legislative Review Priorities

This Plan proposes that relevant subcommittees of an Advisory Board be established and work collaboratively with the Director of Animal Welfare in a phased approach to review existing statutes and propose legislative updates or new provisions, as appropriate, in the following priority areas:

⁵⁶ See 24 V.S.A. § 1943 ("Animal Cruelty Investigation Advisory Board") for the ACIAB's current advisees and duties.

1. General statutory review, integration, and modernization.

A general review would identify existing provisions that are outdated, unclear or contradictory, poorly placed, or no longer necessary; recommend updates for best practices, clarity, and internal consistency; and propose reorganization where appropriate to improve accessibility and coherence.

2. Acts constituting cruelty and procedures governing cruelty cases.

This review would assess both substantive offense definitions and procedural mechanisms, with the goal of improving clarity, efficiency, animal welfare, and fairness while maintaining appropriate due process protections. Particular attention would be paid to reducing unnecessary delays that prolong animal suffering and impose avoidable costs on public agencies and nonprofit partners.

3. Minimum care standards for pet animals.

This review would establish clearly defined minimum care standards that are enforceable through civil mechanisms, such as warnings, tickets, and compliance plans. Such standards would function as an early-warning system, allowing humane officers and animal control professionals to address emerging problems before they rise to the level of cruelty.

4. Dog licensing framework.

Dog licensing serves several important public purposes: verification of rabies vaccination, encouragement of sterilization of animals not part of a responsible breeding program, and generation of revenue to support enforcement and animal welfare programs.

This review would evaluate whether Vermont's dog licensing program is structured to maximize these benefits while minimizing administrative burden and nuisance and cost for dog owners. Issues for consideration include fee structure, compliance mechanisms, data sharing, and integration with veterinary and shelter systems.

5. Governance and oversight of pet animal industry participants.

This review would consider whether a governance structure for pet animal industry participants, including breeders, sellers, animal shelters, and rescue organizations, and anyone importing a pet animal into Vermont for breeding, sale, or rehoming, is needed. If so, it would define parameters, enforcement, and funding mechanisms and set care standards and operational practices consistent with the principles set forth in this Report. The goal of any such oversight would be harm prevention and cost internalization, not penalizing responsible actors.

6. Housing protections and support programs for animal owners.

Housing instability and restrictions on pet ownership are common contributors to animal abandonment and surrender, as well as leading to human homelessness. The review should examine potential incentive-based programs and provisions to encourage pet-inclusive housing, support landlords who accommodate animals, and reduce preventable relinquishment of pets.

7. “The Link” legislation.

A growing body of research demonstrates a strong connection between animal cruelty and violence against people, including domestic violence, child abuse, and elder abuse. Legislative options to strengthen cross-reporting, data sharing, and coordinated responses would be evaluated to better protect vulnerable people and their animals.

8. Access to veterinary care.

Limited access to basic veterinary services is a significant factor in preventable neglect. A review would identify statutory barriers and enabling provisions related to veterinary care, including scope-of-practice rules and licensing, with recommendations aimed at improving access while maintaining high standards of care.

Conclusion

The legislative review plan set forth in this Part is intended to provide Vermont with a structured, collaborative pathway for modernizing its animal welfare laws in alignment with the principles and reforms described throughout this Report. By grounding legislative change in stakeholder expertise, Vermont can avoid reactive or piecemeal reform and instead build a coherent statutory framework that supports prevention, accountability, and humane outcomes.

PART 6: SUMMARY OF REQUIRED ELEMENTS OF THE COMPREHENSIVE PLAN

This Part matches the 8 statutorily-required elements with the corresponding Plan proposals and data addressed in Parts 1-5 of this Report.

1. A proposal concerning oversight of investigations of, and response to, animal cruelty complaints.

This Report proposes that the Director of Animal Welfare oversee investigations of, and response to, animal cruelty complaints through a centralized coordination and review model, rather than by creating a new enforcement agency. This oversight is contingent on sufficient funding being identified, authority granted, and a transition period. Specifically, it proposes that the Director:

- Provide oversight for animal cruelty complaints, regardless of which agency has primary jurisdiction;
- Establish a uniform case-tracking and reporting system in which the Division of Animal Welfare receives notification when a potential cruelty case is opened by any State agency;
- Conduct independent case reviews where a request for assistance is made by another agency or where available information indicates a complaint may not be receiving an appropriate or timely response; and
- Use civil and supportive interventions as the initial response where appropriate and possible.

This approach would allow the Director to ensure statewide consistency, early intervention, and appropriate escalation to serve the animals and people of Vermont, while respecting the statutory authority of other agencies.

2. A proposal concerning the coordination of the administration and enforcement of animal welfare laws in a collaborative manner with law enforcement officers and municipalities that retain authority to enforce animal cruelty requirements.

This Report proposes a collaborative, tiered enforcement model built on shared responsibility. Key coordination mechanisms include:

- Development of regional Animal Cruelty Response Units composed of sworn law enforcement officers, humane officers, prosecutors, human services professionals, veterinarians, nonprofit organizations, and trained volunteers;
- Use of memoranda of understanding among the Division of Animal Welfare and participating agencies to define roles and responsibilities, protocols to follow in requesting assistance, training expectations, and cost-sharing arrangements;
- Employment of a core team of professionals as Division staff, including the Director, a veterinarian, and a humane officer, to support other agencies in their response to complaints and to lead investigations initiated by the Division; and
- Reliance on contractual staffing arrangements with agencies that already employ sworn law enforcement officers in the early years.

Municipal and State law enforcement agencies would retain authority to enforce criminal animal cruelty statutes while the Division would provide technical assistance, coordinate multidisciplinary responses, ensure uniformity across jurisdictions, and lead investigations at times.

3. *A proposal for how the State should address the extent and scope of any deficiencies in Vermont's system of investigating and responding to animal cruelty complaints.*

To address identified deficiencies in Vermont's system of investigating and responding to animal cruelty complaints, this Report suggests that the State:

- Expand civil enforcement tools and develop a cohort of trained humane officers to operate as first responders in many cases;
- Expand preventive options including access to affordable veterinary care and humane education programs;
- Establish regional Animal Cruelty Response Units to improve expertise and consistency;
- Centralize information about potential cruelty complaints and cases statewide; and
- Reduce mandatory holding periods for seized animals through procedural reforms.

Together, these measures would shift the system from a reactive model to a preventative and resource-efficient framework.

4. *A proposal for how the State should ensure that investigations of animal cruelty complaints are conducted according to systematic and documented written standard operating procedures and checklists.*

This Report proposes that all investigations of potential animal cruelty complaints be conducted pursuant to written, documented standard operating procedures (SOPs) developed jointly by the Division of Animal Welfare and law enforcement agencies.

These SOPs would include complaint intake and referral protocols, initial assessment and triage criteria, species-specific checklists, written compliance plans with recheck schedules, documentation and evidence standards, escalation processes; and referral processes to resources and human services.

The SOPs would be updated regularly based on experience and data and their use would be required for participation in the regional Animal Cruelty Response Units and receipt of Division assistance and funding for seized animals.

5. A proposal to house and care for animals seized in response to complaints of animal cruelty, including how to pay for the care of seized animals.

This Report proposes a decentralized, diversified housing and care model for animals seized as part of a cruelty case rather than development of a dedicated shelter system. Key elements of this approach include:

- Streamlining legal processes to better utilize existing animal shelter and rescue organization holding space;
- Increasing holding space by working with municipalities to identify appropriate short-term triage, quarantine, and legal hold period spaces;
- Coordinating with national nonprofit organizations on large seizures;
- Piloting regional animal welfare hubs that can provide short term animal housing for emergency situations together with the delivery of the services and resources proposed in Part 2 of this Report;
- Training and certifying volunteers to serve as foster homes and transporters; and
- Use of the Animal Welfare Fund to pay for boarding and veterinary care, with restitution paid to the Fund by defendants where appropriate.

6. A proposal for funding animal welfare administration and enforcement in the State, including potential sources of public and private funding.

This Report proposes a multi-source funding strategy that does not rely on General Fund appropriations or new or increased fees or taxes. Instead, it proposes aligning existing fees with the activities they support, increasing compliance with existing licensing and tax laws, and offering donation opportunities.

Specifically, for operational expenses the Report proposes matching the existing cat and dog pet food registration fee with pet animal funding needs, closing the income and sales tax gaps with respect to sales of cats and dogs, and improved dog licensing compliance and fee allocation.

For the preventive resources described in this Report, it suggests specific grants that support the activities, as well as development of a specialty license plate, addition of an income tax line-item donation option, and direct solicitation of gifts.

This approach provides both stable funding for operations and flexible donor-driven support for prevention and community assistance programs without increasing the existing financial burden on Vermonters.

7. Recommended amendments to animal welfare statutes or rules, including standards of care for animals housed or imported by animal shelters or rescue organizations.

This Report proposes the appointment of an Advisory Board to assist the Director of Animal Welfare in reviewing existing law and proposing legislative updates or new provisions, as appropriate, with an initial focus on:

- Consolidation and modernization of animal welfare statutes currently scattered throughout the Vermont Code;
- Clarification and updating of animal cruelty definitions and procedures;
- Adoption of minimum care standards for pet animals with robust civil enforcement tools;
- Governance and oversight of pet animal industry participants;
- Review of the dog licensing framework;
- Housing protections and support programs to prevent pet-related housing instability;
- Provisions addressing the link between animal cruelty and violence against people; and
- Improving access to veterinary care.

8. An estimate of the number and type of animal welfare complaints received by State agencies, quantification of the amount of time State agency staff spend fulfilling animal welfare responsibilities, including the costs to agencies of fulfilling the responsibilities.

In 2024, the Vermont State Police (VSP) opened 408 cases classified as “animal incidents”. One hundred eleven involved potential severe neglect or cruelty, of which 69 were referred to Game Wardens for investigation. VSP does not track officer time by case type so no estimate of time spent is possible. It incurred \$16,242 in veterinary and housing expenses that year.

The Department of Fish & Wildlife (DFW) investigated many of the cases referred to it by VSP and opened an additional 99 potential cruelty cases in 2024. The cost to DFW, in terms of employee time, animal housing, veterinary care, and related expenses, was \$87,704 in SFY2025. In addition, Dorset Equine Rescue, a Vermont nonprofit organization, incurred an additional \$29,029 in 2024 in unreimbursed costs related to horse seizures initiated by DFW.

Focus on State agency data omits costs borne by municipalities, most nonprofit organizations, animal control officers, and volunteers in handling animal cruelty, as well as incidents never reported due to confusion about reporting pathways or loss of confidence in the system. Moreover, it does not include time that would be needed to confirm compliance was achieved in most cases where deficiencies that could be the basis for cruelty charges are found on initial investigation but an opportunity for compliance is given.

PART 7: POTENTIAL IMPLEMENTATION TIMELINE

This Report contemplates changes that take Vermont's existing procedures, legislative calendar, and funding constraints into consideration. The items described are designed to be phased in over time and adaptive, while still moving decisively towards a more humane and responsive system with respect to the development, implementation, and enforcement of the animal welfare laws of the State.

Phase 1: Present–June 2026

This Phase predates adoption of the recommendations in this Report and thus focuses on the steps that can be taken given the current authority and resources of the Division of Animal Welfare.

- Monitor testimony with respect to this Report and animal welfare bills and provide assistance when requested during the current legislative term.
- Meet with veterinarians and nonprofit providers, identify access to veterinary care grants, and assist nonprofit organizations in applying for grants to improve access to preventive resources for Vermont pet owners.
- Develop processes for requesting restitution for amounts expended by Vermont State Police in connection with animal seizures and ensure such requests are timely made.
- Build ties between the Division of Animal Welfare, agencies providing human support services, and animal-focused nonprofit organizations.
- Meet with stakeholders to better understand their priorities.
- Accumulate a list of existing preventive resources and contacts.

Phase 2: July 2026–December 2026

This Phase is intended to begin to build the governance, coordination, and planning infrastructure needed for thoughtful reform based on the priorities and plan adopted for the Division of Animal Welfare.

- Plan for the Division begins to be operationalized, including beginning receipt of funding for the Division's operations.
- Donation-based sources for preventive programs, if any, are established.
- Advisory Board appointed for the Director of Animal Welfare, if appropriate, with a goal of providing an initial set of recommendations in time for the 2027 legislative session and providing a prioritized list of future expected proposals.
- Working group for regional Animal Cruelty Response Units appointed, if appropriate, to provide recommendations for initial steps in time for consideration during the 2027 legislative session.
- Develop processes for weekly review of animal neglect and cruelty complaints and responses across State and municipal agencies.
- Identify possible short-term animal municipal holding spaces.

- Apply for grants and identify other sources of private funding for preventive and short-term animal housing resources.
- Build a Division of Animal Welfare website for hosting information about the Division, existing programs, and resources, if funding is available.

Phase 3: January 2027–December 2028

This Phase continues to build the needed infrastructure while reducing preventable cruelty and improve response efficiency. Moreover, legislative changes are anticipated to be proposed based on the priorities set in the earlier Phase.

- Operationalize any staffing plan adopted for Division of Animal Welfare.
- Working group completes review and design of Animal Cruelty Response Unit model and pilots first regional unit, if part of adopted plan.
- Develop standard operating procedures for intake and care of seized animals, response to potential non-emergent cruelty complaints including development of civil enforcement toolkit, response to emergent cruelty complaints and other instances requiring sworn law enforcement as first responders, cruelty investigation, and cruelty case management.
- Develop mobile resources for holding and care of seized animals.
- Continue to apply for grants and identify other sources of private funding for preventive resources.
- Build humane education programs, to the extent funding is available.
- Continue legislative review based on priority order identified by Advisory Board, if any, with suggestions made to the legislature at appropriate times.
- Begin any appropriate oversight of animal cruelty investigations, as well as begin to provide assistance or independent investigation, if appropriate.
- Connect Division of Animal Welfare to additional State agencies to provide appropriate and available assistance.
- Implement any appropriate trainings for sworn law enforcement, humane officers, animal control officers, State's Attorneys, judges, and veterinarians.
- Develop and implement any appropriate trainings and certifications for volunteer fosters and transporters with contact information available to enforcement officers.
- Pilot an animal welfare regional resource hub for resource and service delivery, if appropriate and funding is available.

Phase 4: January 2029–December 2030

This Phase institutionalizes the reforms set forth in the plan adopted for the Division of Animal Welfare and completes the modernization of Vermont's animal welfare statutory framework.

- Continue legislative review based on priority order identified by Advisory Board, if any, with suggestions made to the legislature at appropriate times.

- Continue to build preventive resources as needed and as funding is available.
- Implement any appropriate certification process for animal control officers and begin oversight, if so authorized.
- Establish remaining Animal Cruelty Response Units, if appropriate.
- Establish additional animal welfare regional resource hubs, if appropriate and as funding is available.
- Review and update all standard operating protocols.
- Review staffing needs and funding available and make recommendations for any needed changes.
- Expand training opportunities as needs are identified and funds are available.
- Develop strategic plan for following five-year period.