

**Department for Children and Families
Family Services Division**

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Agency of Human Services

To: The House Committee on Human Services

From: Lindsay Barron, Director of Policy and Planning
Department for Children and Families, Family Services Division (DCF-FSD)

Date: Tuesday, April 14, 2026

Subject: S. 239 (An act relating to the Child Abuse and Neglect Reporting Working Group)

We appreciate the Committee's thoughtful consideration of S. 239 and the continued opportunities for collaboration. We also appreciate the Committee's decision to extend the working group timeline, which will allow for more thoughtful engagement with complex and significant topics and support the development of meaningful, well-informed recommendations. We also want to acknowledge the Center for Crime Victim Services' original intent in proposing this work, particularly the focus on out-of-home sexual abuse and peer-to-peer allegations as a starting point for examination and prioritization of the working group. In this memo, we share our perspectives on workgroup composition and priority topic areas. We remain committed to being strong partners in this effort.

Funding for the Participation of Individuals with Lived Experience

FSD is in support of the participation of individuals with lived experience, including covering per diem costs. We value the inclusion of these perspectives and look forward to learning from their expertise and collaborating on the working group.

Composition of the Working Group & Support

With respect to the composition of the working group, we support the current direction while noting a few considerations. A single representative cannot fully reflect the breadth of perspectives within any given system or group. As such, the working group will benefit from a clear expectation that designated members actively engage and gather input from the broader organizations, staff, groups, or communities they represent. This could be supported through mechanisms such as surveys, focus groups, or other structured outreach and feedback loops.

While we understand and respect the decision to limit DCF to one formal seat, we would welcome clarity and flexibility to ensure the Division can bring forward subject matter expertise to support the work of the group. This may include providing administrative support, contributing research, engaging with national partners and other states, and elevating perspectives from Division staff and practice to inform the group's deliberations. We are also prepared to support the working group by developing



and maintaining a publicly accessible webpage to house meeting information, notes, materials, updates, and key documents related to the group's scope and work.

The latest draft of the bill includes the Defender General's Office as a working group participant and the State's Attorneys and Sheriffs as consulting parties. Given the State's Attorneys' and Deputy State's Attorneys' responsibility for prosecuting cases of child abuse and neglect, their perspective is critical to informing this work, and we recommend their inclusion as full participants on the working group.

Topics Examined by the Working Group

As reflected in recent discussions, the potential scope of this work spans several distinct areas, including: (1) sexual abuse and peer-to-peer allegations; (2) statutory definitions and potential updates; (3) mandated reporting statutes and training infrastructure; and (4) consideration of additional system structures or pathways for support and response. Given the breadth of these topics, we encourage the working group to prioritize where to begin and to consider a phased approach that allows for depth, clarity, and meaningful recommendations within each area.

As the Committee refines the charge of the working group, we encourage attention to several key areas, while maintaining a focused and phased approach:

- Alignment with federal requirements
- Continued refinement of definitions related to abuse and neglect, including consideration of emerging or complex areas such as human trafficking (including labor trafficking), child torture, and child sexual abuse material (CSAM) in the context of adolescent behavior and the distribution of images/content
- Exploration of system pathways that distinguish reports of abuse/neglect from requests for support, including consideration of a "warm line" or similar approach to connect families with preventative services and concrete supports
- Examination of intake and screening practices, including potential models that allow for a brief period (e.g., 10–15 days) of information gathering to assess child safety without initiating a full investigation
- Consideration of practice flexibility in peer-to-peer situations, including whether and how intakes may be reconsidered once accepted, or redirected when appropriate and requested by the victim
- Examination of mandated reporting expectations, including whether failure-to-report statutes are functioning as intended, clarity regarding enforcement, and consideration of how intentionally false reporting is defined and addressed
- Ensuring the continued ability to identify and respond to patterns of harm over time, rather than relying solely on isolated reports
- Engagement with mandated reporters to ensure clarity around how they can be involved to support children and families being served by the Division
- Grounding all recommendations in available data, including trends in serious injury and fatality cases

Intake Call Volume Considerations

Recent research provided to the Committee indicates that the number of reports made to Centralized Intake and Emergency Services (CIES) is significantly higher in Vermont than in other states. While this may appear to be a national outlier, it reflects Vermont's system structure, where the Department is responsible for both the statutorily mandated child welfare system and the juvenile justice system.

As a result, CIES receives not only reports of child abuse and neglect, but also calls related to juvenile delinquency, placement disruptions, after-hours case work needs, a small number of calls for Adult Protective Services (APS) and calls from workers in the field. When these types of calls do not meet the criteria for child abuse or neglect interventions, they are screened out and not accepted. Vermont accepts approximately 41% of the reports made to CIES. There are very few circumstances where Vermont's CIES will refuse to document a report about perceived child abuse and/or neglect, compared to other states who at times will not document calls that do not clearly constitute abuse or neglect. These reasons are collectively attributed to the higher number of calls that Vermont's CIES receives.

Training & Concluding Thoughts

Finally, we note the importance of grounding this work in the full context of practice and system impact. Recent public narratives underscore the complexity of reporting decisions and the potential consequences of discouraging reports without clear alternatives. With the support of the Vermont Child Welfare Training Partnership, FSD is also in the final phases of updating our mandated reporter training, and we would welcome the opportunity for working group members to review that content as part of building a shared foundation for this work.

We stand ready to support the Committee and the working group with data, national context, and operational insight as this work moves forward.