

# REPORT OF THE DIVISION OF RACIAL JUSTICE STATISTICS

STATE OF VERMONT  
OFFICE OF RACIAL EQUITY

---

January 2026

**2025 Annual Report on Systemic Racial Disparities in the Justice System:  
Insights, Progress, and Strategic Recommendations  
of the Division of Racial Justice Statistics**

**Date:** January 15, 2026  
**Submitted by:** Xusana Davis, Executive Director, Office of Racial Equity  
Andre Comandon, Division Manager, Division of Racial Justice Statistics, Office of Racial Equity  
Laura Carter, Division of Racial Justice Statistics, Office of Racial Equity  
**Agency:** Division of Racial Justice Statistics (DRJS), Office of Racial Equity (ORE), Agency of Administration (AOA)

### **Director's Note**

This year's DRJS report focuses deeply on an ongoing data collection project that reaches across state government agencies and departments to inventory and assess the State's capacity and efficiency related to data collection and retention. It departs from the format and content of the previous year's annual report, which contained more statistical data reporting and analysis of key metrics across the criminal legal landscape, such as school suspensions, traffic stops, and incarceration. Despite the curious yet wholly unsurprising pushback received from certain agencies following the publication of last year's report, the Division remains committed to collecting and reporting on those metrics on an ongoing basis. Staffing transitions over the last several months have limited the team's ability to manage that task, which is why this year's report does not feature such statistical analyses. The Division looks forward to resuming its work to deeply study reported data as staffing returns to more sustainable level. Notwithstanding, see "Division Resources" below for more discussion about staff support, and see the 2026 Report of the Executive Director for additional detail about the response to last year's DRJS annual report.

### **Division Mandate**

Act 142 of 2022 establishes the Division of Racial Justice Statistics (DRJS) and mandates that the Division collect, analyze, and disseminate data on racial disparities in Vermont's justice system. [Title 3, Chapter 68](#) of the Vermont Statutes requires that the Division monitor and report on the impacts of racial bias across law enforcement, the judicial system, and other sectors, with the aim of supporting policy reform and enhancing equity. Accordingly, this Annual Report provides: A) findings on systemic racial bias and disparities in Vermont's justice system; B) updates on progress made to address system disparities; and C) data-driven recommendations.

### **I. Progress on Justice Technology Asset Inventory and Gap Analysis**

3 V.S.A. §5012(a)(4) requires the Division "maintain an inventory of justice technology assets and data dictionary" and conduct a gap analysis of data systems and information sharing<sup>1</sup>. In 2025, Division staff spent six months devising and implementing a gap analysis strategy, beginning with the justice technology asset inventory.

---

<sup>1</sup> [3 V.S.A. § 5012](#)

The gap analysis project was developed in collaboration with information professionals from the Vermont State Archives and Records Administration (VSARA) and the Agency of Human Services (AHS). The plan outlines project objectives connected to each of the Division’s mandates in 3 V.S.A. §5012-5013. Thus far, the project has focused primarily on establishing the justice technology asset inventory and identifying gaps in these systems through a functional analysis approach paired with statutory research.

Functional analysis<sup>2</sup> is a systematic method for studying complex systems by examining their individual components and the relationships between them. Vermont’s criminal legal landscape can be analyzed using functional analysis to understand the broader context and opportunities to modernize and make these systems more equitable. Functional analysis is a way to see the “big picture” from different angles. This approach provides the analytical framework necessary to identify overlapping statutory responsibilities, unique activities, and critical gaps across Vermont’s criminal legal landscape. With an understanding of state systems and current data collection processes, the Division can better conduct mandated statistical analysis to address systemic racial bias and share information with the public. Analysis conducted by the Division can only be as good as the data available in these systems; it is our collective responsibility to ensure that we are intentional with data collection, data integrity, and data quality for the benefit of all Vermonters. Disparate systems, when reviewed individually, may obscure patterns of racial bias, which can become more apparent through a broader “macro” approach, ultimately promoting Vermont’s ability to create a more equitable justice system for all its residents and visitors. Through functional analysis, we can study and classify the complex web of data relationships across agencies, establish standardized collection processes, and create the governance structures necessary for meaningful reform.

This project’s holistic approach combines functional analysis, information and data governance, and direct collaboration. In turn, the Division expects that these activities will facilitate (1) improved accessibility and transparency of information, (2) greater access to justice, as well as (3) simplified management responsibilities for this volume of information and data. There are five main objectives anchoring the broader gap analysis plan, illustrated below.

#### A. Project Objectives



<sup>2</sup> Cook, T. Macroappraisal in Theory and Practice: Origins, Characteristics, and Implementation in Canada, 1950–2000. *Arch Sci* 5, 101–161 (2005). <https://doi.org/10.1007/s10502-005-9010-2>

As mentioned previously, the project team’s primary focus has been Objective 2, establishing the data dictionary and justice technology asset inventory, with gap analysis work outlined in Objective 1 occurring on an ongoing basis. The full project plan is available in Appendix 1 of this report. For Objective 2, DRJS and VSARA leveraged connections with department and agency records officers to establish groups called Data Governance Action Pods (DGAPs). These groups consist of department data system experts designated by the department’s records officer to work towards establishing an inventory of justice technology assets at each criminal legal agency. Ultimately, the inventory will catalogue known technology assets into a single resource that outlines overlapping functions and system relationships with supporting data elements verified during the governance assessments and beyond as needed.

### **1. DRJS Gap Analysis Research Question**

The Division began with the following research question: How do agencies and departments create, manage, and share criminal justice-related data, and what challenges may limit the accuracy, accessibility, or equity of such data? What opportunities exist to improve data quality, streamline processes, and support coordination across state agencies and departments?

### **2. Data Governance Action Pods (DGAP) Kickoff Meetings and Systems Governance Assessments**

A kickoff meeting was held with each group to discuss project scope, project objectives and each department’s role within the project. Each DGAP group then completed a Systems Governance Assessment to help the project team better understand each department’s views of their processes and how they engage with their data. Post-assessment follow-up meetings were held to walk through a series of questions based on departments’ self-assessments. The objectives for these meetings included:

- Identify all data systems in use or acquired by the department,
- Document any known issues, obstacles, or gaps pertaining to data systems or data collection processes,
- Walk through data entry workflows and quality control processes, and
- Discuss next steps or the need for follow-up meetings.

The Systems Governance Assessment was based on the Generally Accepted Record Keeping Principles<sup>3</sup>. The assessment included eight questions aligned with the Principles and allowed the respondent to select from five options representing information governance maturity levels on a Likert scale. Governance structures are embedded in every project objective at every project level to ensure a solid foundation of data and information governance is established to successfully achieve other areas of DRJS mandates, such as establishing consistent governance policies across Vermont’s criminal legal landscape.<sup>4</sup>

---

<sup>3</sup> [GARP Pages for PDF](#)

<sup>4</sup> [3 V.S.A. § 5012](#)

Results from the Assessment allowed the project team to work with respondent departments based on their self-assessed level of maturity, establishing opportunities tailored to their current understanding of their data and information systems. The inventory will evolve as assessments are completed and as the Division continues to engage the DGAP groups. Currently, the inventory of justice technology assets includes information on data owner, vendor name, and legacy systems. The Division hopes to expand the inventory to include overlapping functional areas and system relationships, with supporting data elements in each major data system. A follow-up assessment will uncover formal data agreements between agencies or may highlight the need for formal agreements in the future to comply with applicable legal mandates; as of the publishing of this report, this portion of the inventory is in development.

The data dictionary component of the gap analysis has created many follow-up questions that we will present later in this report. The Division plans to work with agencies and departments to define data elements if department/agency-specific data dictionaries do not exist, though there are some departments who at a minimum are able to provide the systems dictionaries provided by their software vendors, if requested. The Division expects that a comprehensive data dictionary will clarify terms that are defined differently between agencies or departments and will serve as a valuable resource for interested parties and communities. Establishing more consistent terminology across state government will become more attainable with a better understanding of existing data elements across systems, as well as where there are data agreements between agencies.

### **3. DGAP Department and Agency Relevant Entities**

	Center for Crime Victim Services (CCVS)
	Attorney General's Office (AGO)
	Department of Corrections (DOC)
	Department of Public Safety (DPS)
	Department for States Attorney and Sheriffs (SAS)
	Department for Children and Families (DCF)
	Vermont Crime Information Center (VCIC)
	Vermont Criminal Justice Council (VCJC)
	Office of the Defender General (ODG)
	Vermont Judiciary (JUD)

### **4. Identified Systems Matrix**

The data systems outlined in the table below were identified in meetings with DGAP groups and further verified through follow-up correspondence. The table reflects most data systems within the Vermont criminal legal landscape; some systems are intentionally omitted, pending final verification by the Data Owners. It is important to note that many of the agencies indicated they are already in the process of obtaining new data systems. As a result, some information in the table may become obsolete sooner than anticipated. Data stored in legacy systems will need to be migrated into new systems, meaning that conversations surrounding governance should occur sooner to facilitate implementation as agencies prepare for their new data systems. Because of technology's almost immediate obsolescence, the Division plans to review this inventory annually to capture changes. Additionally, it is certain that there are more data systems in use than have been identified, including data being stored on local drives and through the Microsoft suite in platforms like SharePoint.<sup>5</sup>

SYSTEM NAME	DATA OWNER	VENDOR NAME	LEGACY SYSTEM	NOTES
Acadis System	VCJC	Vector Solutions	Skills Manager	
Advologix	ODG	Mitratesh	JustWare ODG	
Collect	CCVS	ComTech	Paper document processes	Hybrid paper and digital files and moving towards being all digital
Computerized Crime Victim Compensation System (CCVCS)	CCVS	CCVC Inc	Paper document processes	
CorrecTek (EHR)	DOC	DOC	Paper document processes	DOC took over the contract from the healthcare provider Vitalcore in 2023 and now manage the contract
Focus Student Information System (SIS)	DOC	Focus School Software	PAS	
FSD Net	DCF	SOV/ADS	N/A	
JustWare SAS	SAS	Journal Technologies	Paper document processes	No longer vendor supported
LawManager	AGO	Bridgeway Solutions	N/A	No longer vendor supported
Matrix (Prosecutor)	SAS	Matrix Point	JustWare SAS	Migrating into Matrix from JW(SAS) likely in early 2026

<sup>5</sup> There is currently ongoing work within the Agency of Human Services EPMO team on identifying all SharePoint sites within the Agency. This will help identify data owners, data elements, cross-agency collaboration efforts, and where there are missing data or data ready for disposition (such as duplicate and inactive sites).

Matrix (Prosecutor)	AGO	Matrix Point	LawManager	Migrating into Matrix from LawManager likely in early 2026
NIBRS	Federal	<i>unconfirmed</i>	<i>unconfirmed</i>	DPS feeds into NIBRS
Offender Management System (OMS)	DOC	JailTracker	TinyTerm	Current contract is ending and new RFP will be going out in 2026.
Sex Offender Registry	DPS	Watch Systems	N/A	DOC also has access to this system
SharePoint	SOV	Microsoft	Local Drives and Paper document processes	Nearly every entity we talked to included SharePoint as one of their repositories for data and information
Social Services Management Information System (SSMIS)	DCF	SOV/ADS	N/A	
Spillman	DPS	Flex/Motorola	Paper document processes	No longer vendor supported; used by fewer than 5 LEAs
Valcour	DPS	Crosswind Technology	Spillman	
Vision	SOV	<i>unconfirmed</i>		Used by CCVS

The project team continues its dialogue with respondent departments to verify the details above and plans to issue an addendum to the identified systems matrix with additions.

Known systems pending verification include:

- Enterprise Justice (formerly Odyssey in name only)
- VOWS
- VINE
- YOMS (Youth Offender Management System)

## B. Next Steps

The project team plans to expand information gathering in 2026 to capture data sharing agreements. These insights will help identify gaps in data collection and reuse. One outcome of the team's information gathering will be the consolidation of individual data elements across criminal justice agencies providing increased consistency in terminology definitions and use. Before moving forward with the development of the "justice technology strategic plan,"<sup>6</sup> there must first be a better understanding of the data landscape across these criminal legal agencies. The DGAP groups will be re-engaged during the strategic planning process to ensure that interested parties' concerns are captured with actionable solutions. Through the strategic plan,

<sup>6</sup> [3 V.S.A. § 5012](#)

the Division hopes to uplift both enterprise-wide and individual department challenges with managing records and information. The justice technology asset inventory and data dictionary will be included as appendices in the justice technology strategic plan. The periodic review of the strategic plan will also include a review of the appendices.

### **C. Recommendations and Lessons Learned**

The project team met with ten state partners to discuss their data systems, challenges, and needs to better understand Vermont's criminal legal landscape. These informal interviews revealed that, despite differences in mission or technology, agencies face many of the same challenges and that there are opportunities to address them through agency-specific process and statewide standards. Three such challenges are highlighted below:

- increasing awareness and best practices of data and information governance;
- allocating appropriate resources to meet the staffing, funding, and technical capacity of an ever-changing landscape; and
- clarifying the scope of the data dictionary.

Broader collaboration could build Vermont-specific best practices, streamline the flow of information, and facilitate cost savings. The Division plans to gather subject matter experts from across the criminal legal landscape and beyond to establish a steering committee focused on the development of consistent standards for cross-agency data governance. This group will assist in the development of the justice technology strategic plan, which is Objective 3 of the Gap Analysis Project proposal. All agencies would benefit from consistent sharing processes.

## **1. Increasing Awareness and Practices of Data and Information Governance**

State partners participating in this project are at different levels of data and information governance awareness. Through interviews with DGAP participants, it became clear that each entity is engaging separately with these governance questions. Some state partners are actively adopting governance practices that could serve as a model for future development. Specifically, some of those practices of note include:

### **a. Accountability: [Valcour Governance Board](#)**

The Valcour Governance Board “develops policies relating to the user requirements of the Valcour VT community. The establishment of policies and procedures is intended to ensure that the network is used appropriately, ensuring and protecting data quality and that security, privacy and confidentiality of the information is protected. Members are from various contributing public safety organizations from around the state.”<sup>7</sup> The Valcour Governance Board is not mandated by statute and exists to fill a need identified by DPS for its data, data systems, and users. Additionally, meetings are public and posted online for the public to attend or view.

DPS' success in establishing governance oversight within its main data system is a positive example of the importance of governance as the foundation to problem-

---

<sup>7</sup> [Valcour Governance Board | Department of Public Safety](#)



solving within data systems. As a follow-up to their Systems Governance Assessment, the project team encouraged DPS to share lessons learned regarding establishing the Valcour Governance Board so that other agencies may be able to adapt and establish their own similar board. Specifically, within criminal legal agencies, departments could address gaps in how the State creates, manages, and shares criminal justice-related data. As part of the Division's larger project plan, a data governance group will be created, however, the Valcour Governance Board could be a useful and replicable model for other individual departments to adopt.

b. Transparency: Vermont Criminal Justice Council (VCJC)

In 2022, the State Auditor's office issued twelve recommendations to VCJC to improve training accountability and system oversight. VCJC has responded directly to these recommendations and over the last few years has strengthened governance and management of their systems information, increasing transparency in its operations and processes.

VCJC is now implementing a new system with enhanced compliance and reporting features. The increased data visibility allows issues to be flagged and addressed more promptly. While migrating data from the legacy system has presented challenges, VCJC has established a strong working relationship with their new vendor. Weekly meetings provide opportunities for staff and system users to ask questions, receive hands-on training, and preview upcoming features. VCJC's on-going collaboration with the vendor has facilitated some process automation including implementing the auditors' recommendations related to access, management and monitoring information.

VCJC's commitment to information governance demonstrates the value of dedicating more attention and resources to transparent operations.

c. Compliance: Attorney General's Office (AGO), Criminal Division

Regular, open communication paired with strict legal compliance enables the AGO to identify system issues as they arise. AGO, and the Criminal Division in particular, use this system insight to resolve issues quickly. The Criminal Division also conducts quarterly reviews of system data, serving as a self-audit to ensure system information is current and AGO processes are followed.

Currently, the AGO is transitioning between systems and preparing to migrate legacy case data from LawManager to the new system, Matrix (Prosecutor). The Criminal Division plans to use Matrix's enhanced features to better align information management practices with existing records management schedules.

These interviews set the foundation for data and information governance best practices for the project. They also reinforced what the team suspected – that these cross-agency governance discussions don't happen often enough.

The project team summarized key opportunities, including clearer roles and responsibilities for information oversight, that were discussed during the DGAP System Governance Assessments to

advance information governance maturity in essential areas. Each summary was tailored to the agency's current maturity level and included target recommendations. The agency guidance included their current self-assessment maturity score and quick-win action steps. The project team intends to continue collaborating with partners as the gap analysis progresses.

The project team considers the ability to connect with colleagues around the state a major step forward for enhancing data and information management.

## **2. Resource Allocation to Promote Better Systems Governance**

While the demands for data and information from the General Assembly and federal partners continue to increase, the State's existing data systems fail to meet expectations. Understanding that resources are always limited, the Division urges policymakers and data-managing departments to invest tangibly in the values the State claims to hold by properly resourcing the necessary data systems.

### **a. Department for Children and Families (DCF)**

DCF is currently using the oldest known child welfare system in the country.

This system went live in 1983 and has since slowly lost functionality that allows easy system reporting and new data entry. The project team learned that the depth of system distrust within DCF has led some district offices to maintain duplicate paper files and to rely on manual data entry to provide continuity of services. These workarounds perpetuate inconsistent operations, increase the State's exposure to risk, and potentially impact service quality.

Investing in a modern child welfare system is essential to ensure staff have the required information to provide their services; which is to support the safety and well-being of some of the state's most vulnerable people. Continued reliance on an outdated system risks information gaps, leading to operational inefficiency, and ultimately the perpetuation of harm within the very systems intended to support children.

Addressing this issue is vital for the State to meet its obligations.

### **b. Department of States Attorney's and Sheriff's (SAS)**

SAS is transitioning to a new data system and plans to implement more automated processes to alleviate administrative burden. SAS needs dedicated staffing to support this transition and promote consistent data management practices across each of the 14 independent offices.

Data management processes vary across offices, creating challenges with information access and use. Coupled with inadequate staffing, many attorneys spend time on data entry rather than casework. Additionally, SAS receives information in formats that require manual entry into existing systems, substantially increasing the risk of transcription error. Inconsistent data entry and quality control practices can lead to operational inefficiency. Allocating staff to specifically support information

management would reduce administrative demands on attorneys and allow for more direct oversight of systems operations.

c. Office of the Defender General (ODG)

The Defender General's Office faces unique data management challenges because its records and information are client-driven and belong to the client. Due to inadequate staffing the ODG, certain cases are predominately handled by contracted attorneys. These contractors do not use state systems to manage their caseloads. While all attorneys are required to follow state laws and rules for professional conduct, contractor data systems and management are not visible to the Office.

Contractors are required to provide high-level case data; however, this information may be delayed, or in some instances not provided, leaving the Defender General to rely on caseload formulas to generate aggregate data. The project team also learned that operational demands frequently take precedence over more administrative recordkeeping and data management needs. The ODG is aware of this challenge and has unsuccessfully sought to hire a statistician for over a year.

Increased staffing, in addition to a statistician, would enable the Office to shift data oversight responsibilities from the Defender General and improve data analysis and reporting. Increasing in-house attorney capacity would also reduce reliance on contractors, leading to stronger control of internal case management. It is clear the ODG has a vested interest in their clients' needs, and better access to justice overall. These supports would improve the ODG's ability to align its operations with records and information management best practices while continuing to meet client needs and advance access to justice.

### **3. Clarifying Scope of DRJS Data Dictionary**

The most frequently asked question was how the Division defined data dictionary. To best fulfill this portion of its statutory mandate, the Division requests additional legislative clarity on the term "data dictionary." The statutory language does not specify the intended scope or level of detail for the documentation that the Division is required to produce.

Initially, the Division understood the data dictionary as a glossary of terms, defining communal data elements across systems. Once gathered, state partners would collaboratively reconcile definitions of terms that might be used differently across agencies. However, during DGAP interviews, partners including DOC and the Judiciary offered to provide their existing system data dictionaries. Those resources align with more systems-focused or technical-level documents that are also called "data dictionaries" and provide information about "each data element, its definition, where and how it is used, and its relationship to other data."<sup>8</sup> These documents contain hundreds, or sometimes thousands of pages.

---

<sup>8</sup> *Glossary of Records and Information Management Terms, 5<sup>th</sup> Edition*, version V5032 (Overland Park, KS: ARMA International, 2016), 12.

The Division routinely uses the term “criminal legal system,” as do numerous other organizations that are dedicated to the goal of collective liberation<sup>9</sup>. State government partners occasionally asked which entities are included under the umbrella of “criminal legal agencies.” Generally, the Division refers to the somewhat analogous term “criminal justice agency” as defined in 20 V.S.A. 2056a, understanding that there are some relevant entities that fall outside of this scope. For example, DCF doesn’t fall under the statutory definition of a “criminal justice agency,” but maintains data for juvenile justice purposes. Through functional analysis, other similar overlaps have been identified between criminal legal data and agencies outside of the criminal legal system. While the Division’s charge is specific to the criminal legal space, there is tremendous value in understanding the relationships between upstream and downstream agencies and the criminal legal system. It is important for the DRJS’ work to better understand how and why criminal legal agencies intersect, and whether prediction indicators can be identified for disparate impacts.

As state systems and known access points between departments are identified, it might become necessary to hand this task to another agency or steering committee with capacity to undertake that work, depending on how broadly the web of entities grows to include entities perhaps not originally anticipated by the enabling statute. For example, there will likely be connections to the Vermont Department of Labor, most—if not all—of the Agency of Human Services, the Agency of Education, and more.

## II. Division Resources

In 2021, the Racial Disparities in the Criminal and Juvenile Justice Systems Advisory Panel (RDAP), was tasked to:

*“report to the House and Senate Committees on Judiciary on the creation of the Bureau of Racial Justice Statistics to collect and analyze data related to systemic racial bias and disparities within the criminal and juvenile justice systems. The report shall address: (1) where the Bureau should be situated, taking into account the necessity for independence and the advantages and disadvantages of being a stand-alone body or being housed in State government; (2) how and to what extent the Bureau should be staffed; (3) what should be the scope of the Bureau’s mission; (4) how the Bureau should conduct data collection and analysis; and (5) the best methods for the Bureau to enforce its data collection and analysis responsibilities[...].”<sup>10</sup>*

The RDAP’s report calculated the DRJS’ workload to require a minimum of five full-time staff to be successful and additionally recommended that “staffing should be reviewed on a regular basis after their inception.”<sup>11</sup> Officially established by Act 142 of 2022, the Division received an appropriation for three staff positions: a data manager and two data analysts. After three years of operating with three—

---

<sup>9</sup> Jules, Jaden, et al. *Why Use “Criminal Legal System” Instead of “Criminal Justice System?” A Closer Look at the Evolving Language of Law*, RTI International, Aug. 2022, [cepp.com/wp-content/uploads/2023/02/RTI-CriminalLegal-vs-CriminalJustice-Brief-2022-08.pdf](https://cepp.com/wp-content/uploads/2023/02/RTI-CriminalLegal-vs-CriminalJustice-Brief-2022-08.pdf).

<sup>10</sup> [ACT-65-RDAP-REPORT-FINAL.pdf](#)

<sup>11</sup> Ibid.

or fewer—staff, the Division proposes that the legislature consider expanding the DRJS to include a new, additional analyst position, whose scope is focused on criminal legal policy and research.

In the last two legislative biennia, bills that have major impacts on data in the criminal legal landscape in Vermont have been introduced. Instead of splitting regular tasks and monitoring the legislature between current analysts and manager, a specifically dedicated policy analyst can best keep track of these changes and any disparate impacts that could arise, while working with the data analysts and manager on data driven solutions and recommendations.

As the Division is scoped primarily for the criminal legal landscape, the policy and research analyst will focus on those areas of legislation, research, and reform. Mirroring some of the responsibilities of the ORE policy and research analyst, the Division's policy analyst would work closely with the Office analyst when overlaps occur in other policy areas during the legislative session and beyond. We know that upstream factors contribute to entrants into the criminal legal system and having the opportunity for more internal collaboration can help with monitoring and addressing issues as they arise. Additionally, creating a policy analyst role within the Division alleviates some burden from the ORE analyst, but also allows for more concentrated focus on statehouse initiatives the Division needs to be part of that may have historically been missed due to lack of staffing. The Division policy analyst would act as a bridge between the policy and data worlds to best communicate from the Division how their statistical analysis impacts policy and how policy can impact data.

Currently, the Division is utilizing one of its analyst positions to focus on policy during the legislative session and supporting research initiatives where there is need throughout the year. The legislative session lasting roughly half the year means that one of the two designated analysts within the Division are unable to dedicate as much time to other responsibilities as outlined by the legislature in 3 V.S.A. § 5012 and 3 V.S.A. § 5013. Expanding the Division team to include a policy and research analyst allows for this vital component to the Division's work more keen attention while also not losing support in other vital areas for which the Division is responsible.

# Appendix 1:

## FUNCTIONAL APPROACH TO DATA SYSTEMS GAP ANALYSIS

Division of Racial Justice Statistics, Office of Racial Equity  
Vermont State Archives and Records Administration  
2025-2026

### OVERVIEW

Criminal legal information and data are essential not only to the operations of the State's criminal legal agencies and the individuals impacted by the criminal and juvenile justice systems, but also to the equity and rights of all residents and visitors. The societal value of this public asset cannot be understated. Yet, critical gaps in information collection, management, accessibility, and reliability perpetuate racial disparities and hinder evidence-based reform efforts. In 2022, the Vermont General Assembly recognized the untapped potential of this information to reduce systemic racial bias and disparities across the State and created the Division of Racial Justice Statistics.

Act 142 of 2022<sup>1</sup> established the Division of Racial Justice Statistics (DRJS) within the Office of Racial Equity (ORE) to "collect and analyze data related to systemic racial bias and disparities within the criminal and juvenile justice systems." DRJS' goal is to inform policy decisions that work toward remedying racial disparities across state government criminal legal systems. To accomplish this objective, the State needs a holistic understanding of the information and data — not only the technical systems, but also their interrelated legal and operational contexts.

The Vermont criminal justice system can be analyzed using functional analysis<sup>12</sup> to understand the broader context and opportunities to effect change. Functional analysis is a systematic method for studying complex systems by examining their individual components and the relationships between them. It is a way to see the "big picture" from different angles. This approach provides an analytical framework necessary to identify overlapping responsibilities, unique activities, and critical gaps across Vermont's criminal legal landscape. Through functional analysis, a clearer picture emerges from what would otherwise be fragmented data systems. Disparate systems, when reviewed individually, may obscure patterns of racial bias, which can become more apparent through a broader "macro" approach, ultimately promoting Vermont's ability to create a more equitable justice system for all its residents and visitors. Through functional analysis, we can study and classify the complex web of data relationships across agencies, establish standardized collection processes, and create the governance structures necessary for meaningful reform.

This document is organized into three main sections: an overview of project objectives and background, a detailed plan of action with next steps for implementation, and a conclusion highlighting opportunities for transformative impact on Vermont's justice technology assets.

---

<sup>12</sup> Cook, T. Macroappraisal in Theory and Practice: Origins, Characteristics, and Implementation in Canada, 1950–2000. *Arch Sci* 5, 101–161 (2005). <https://doi.org/10.1007/s10502-005-9010-2>

## Division Mandates

DRJS' working priorities are informed by both the Racial Disparities in the Criminal and Juvenile Justice Systems Advisory Panel (RDAP) and the Racial Justice Statistics Advisory Council (RJSAC). This project uses a functional analysis strategy addressing the Division's mandate to "conduct justice information sharing gap analyses." As outlined in this plan, DRJS will study overlaps in areas of responsibility and provide a better understanding of where information is created or received by the agencies and departments considered within the scope of Vermont's criminal and juvenile justice system.<sup>13</sup> RDAP further outlined data areas of interest in its 2020 report to the legislature, highlighting both the adult and juvenile justice systems.<sup>14</sup> Once complete, the Division will expand beyond criminal legal agencies and examine upstream factors that contribute to system involvement.

## DRJS Research Question

How do agencies and departments create, manage, and share criminal justice-related data, and what challenges may limit the accuracy, accessibility, or equity of such data? What opportunities exist to improve data quality, streamline processes, and support coordination across state agencies and departments?

## Project Objectives

The Division will apply the Vermont State Archives and Records Administration (VSARA)'s functional analysis approach to streamline the identification of overlapping agency responsibilities, along with unique responsibilities and gaps. VSARA's functional analysis helps break down the complexities of government into basic parts that identify relationships and dependencies between state agencies and departments. This enables VSARA to identify core government areas of accountability or "functions" and develop lifecycle management plans for associated public records in compliance with relevant legal and recordkeeping requirements. Through functional analysis, we will gain a better understanding of the requirements for system integration, or the lack thereof, and the relationships between data created, maintained, or reported out of Vermont's criminal legal agency systems.

To balance compliance requirements with existing day-to-day operations, this project will verify criminal legal agencies' implementation through informational interviews, system governance assessments, and business process surveys. Criminal legal agency feedback, coupled with functional analysis, will provide a more accurate understanding of how users interact with their data and data systems; assess data collection processes; and implement quality control. Without strong information and data governance in place, implementing compliance requirements organically can result in bespoke solutions across complex justice technology assets; therefore, this project emphasizes governance conversations with system users. Project collaboration and relationship-building with RDAP's prioritized agencies offers the opportunity to establish cohesive data management strategies and mitigate ad hoc/unplanned growth of information and data assets.

The project's holistic approach combines functional analysis, information and data governance, and direct collaboration. In turn, these activities will facilitate (1) improved accessibility and transparency of information, (2) greater access to justice, as well as (3) simplifying management responsibilities for this volume of information and data.

Conducting this analysis will result in five main objectives, listed below. Each objective addresses a component of the DRJS' statutory mandate as outlined in 3 V.S.A. § 5012 and 3 V.S.A. § 5013.

---

<sup>13</sup> 3 V.S.A. § 5012

<sup>14</sup> [Microsoft Word - RDAPAct148Report FINALfinis.docx](#)



#### **Objective 1: Conduct a Justice Information Gap Analysis**

DRJS and VSARA will identify data gaps in the criminal legal technology systems using an updated functional analysis matrix created by the DRJS and a governance assessment tool developed in partnership with VSARA. Each criminal legal agency's recordkeeping requirements, as outlined in law, will help identify the specific data assets and elements created, received, or maintained by the agency through the course of daily government business. Individual governance assessments will be conducted with each identified department or agency to track existing interagency agreements and memoranda of understanding (MOUs) for data-sharing. **Data gathered under this objective will highlight opportunities for establishing agreements and MOUs where none exist.**

#### **Objective 2: Maintain and Develop Inventory of Justice Technology Assets and Data Dictionary**

DRJS and VSARA will partner with department and agency records officers to establish an inventory of justice technology assets at each criminal legal agency. The inventory will consolidate known technology assets into a single resource that outlines overlapping functions and system relationships with supporting data elements verified during the governance assessments. The DRJS will work with agencies and departments to define data elements if department/agency-specific data dictionaries are not available. Assessment details are provided in the plan of action and next steps section of [this report](#). **Data gathered under this objective will establish the first comprehensive justice technology asset inventory and companion data dictionary.**

#### **Objective 3: Develop a Justice Technology Strategic Plan**

The main deliverable outcome of the collective governance assessments is a justice technology strategic plan. Needs and issues with data and data systems will be included as part of a survey conducted with relevant groups prior to the initial assessment meeting and will serve as a starting point for understanding administrator and user relationships with the data and data system(s). This strategic plan will include the identification and prioritization of data needs and requirements to best fulfill new or existing data research proposals or operational enhancements that are tied to current statutory mandates. Examples will be provided to emphasize to the legislative and executive branches the importance of allocating appropriate resources and funding to address ongoing and persistent infrastructure issues that have not been adequately addressed, despite increasing demands for better, more accessible, and accurate data that can be provided in a timely and efficient manner. **Input from and collaboration with partners will guide the larger creation of the Justice Technology Strategic Plan.**

#### **Objective 4: Establish Standardized Data Collection Processes**

The Division will recommend to State and local agencies evidence-based practices and standards for the collection of racial justice data through the collaborative efforts of the Data Governance Advisory Group (Equidata), taking feedback from both RDAP and RJSAC as advisory bodies to the Division. Once the justice technology assets have been identified and governance assessments have been completed, there will be a greater collective understanding of the



current data landscape and existing data collection practices. **In addition to establishing a statewide foundation for information and data governance, this Advisory Group will work collaboratively to establish processes for standardizing the collection of data regarding race and ethnicity across the criminal legal landscape and related systems.** Additionally, the Division will work with VSARA and data owners on retention of the data collected pursuant to DRJS mandates within the structure of the Statewide Records and Information Management Program.

#### **Objective 5: Develop and Implement Data Governance Policies**

The work of improving and creating more consistency across state data management platforms must be heavily based on the governance of that data and information. To achieve this objective, the Equidata Data Governance Advisory Group will be established by the Division, bringing together data partners from across state government, including partners from criminal legal agencies (data owners), the Chief Performance Office (CPO), VSARA, and more. **Together, this interdisciplinary group will work collaboratively to build data governance policies that can be adopted universally and tailored specifically based on public exemptions or other user agreements.** The Group's focus will be enterprise-wide, with more nuanced applications being supported by collaboration with the Division and the identified criminal legal agencies.

## **PLAN OF ACTION AND MILESTONES**

The following areas represent major milestones in meeting the project's objectives. Timeline and target delivery dates are provided in Appendix [#1](#) and will be adjusted as necessary.

### **Identify Relevant Parties and Partners**

Update VSARA's functional analysis reports for criminal legal agencies and other partners and incorporate them into DRJS' larger matrix of criminal legal agencies. VSARA will expand functional analyses for identified gaps. For efficiency, partners will be engaged using a phased approach. Initial agency contact will rely on VSARA's network of agency and department Records Officers. DRJS, VSARA, and agency Records Officers will identify contact information for those best suited to discuss department system administration and well-versed data users, including subject matter experts, Agency of Digital Services (ADS), and agency legal counsel. This group of individuals will establish each agency or department's Data Governance Action Pod (DGAP).

### **Develop a Communication Plan [Completed]**

Data Governance Action Pods (DGAP) will be established; DRJS and VSARA will lead the assessments. Ahead of the assessment, the DGAP main points of contact and project lead will be determined and shared with other team members, including backup contacts.

### **Refine the System Assessment Tool [Completed]**

DGAP participants will be provided with a systems assessment outline ahead of the kickoff meeting with DRJS and VSARA. This outline will identify project objectives, project scope, and contextual information on the generally accepted recordkeeping principles and information and data governance. A short questionnaire will be included with the outline. Questionnaires will be discussed at the beginning of the kickoff meeting to better understand the respondents' understanding of their data and data systems, creating a baseline for DGAP to develop a plan moving forward.

The questionnaire will be an updated version of the State of Vermont's Systems Assessment Model. The Systems Assessment Model was first developed and piloted during Vermont's participation in the National Criminal Justice Reform Project (2017).

## Conduct the System Assessment Readiness Meeting(s)

Every DGAP will have a kickoff meeting. Meetings will start with a discussion of the outline provided to the team prior to the meeting. Once established, the overall objectives of these meetings will be to:

- Identify all data systems in use or acquired by the department,
- Document any known issues or gaps pertaining to data systems or data collection processes,
- Walk through data entry workflows and quality control processes, and
- Discuss next steps or the need for follow-up meetings.

## Create the Technology Asset Inventory and Data Dictionary

The governance assessments will provide the information needed to create the justice technology asset inventory and comprehensive data dictionary. The inventory and data dictionary will evolve as assessments are completed. Open communication between departments or agencies, the Data Governance Action Pod, and the Division is vital to address questions as they arise. While not a listed objective for the project, relationship-building is a key strategy for sustained governance success.

The inventory of justice technology assets will outline overlapping functions and system relationships, with supporting data elements verified during the governance assessments. Assessments will uncover formal data agreements between agencies or may highlight the need for formal agreements in the future to comply with applicable legal mandates.

The DRJS will also work with agencies and departments to define data elements if department/agency-specific data dictionaries do not exist. A comprehensive data dictionary will clarify terms that are defined differently between agencies or departments and will serve as a valuable resource for interested parties and communities. Consistently defining terms across the criminal legal landscape enables advisory bodies to the DRJS to provide feedback on processes and determine which definitions should become State standards, especially in cases where the terminology may be defined differently.

As part of the State's Justice Technology Strategic Plan, an appendix including the justice technology asset inventory and data dictionary will be reviewed annually.

## Establish the Data Governance Advisory Group (Equidata)

The Data Governance Advisory Group (Equidata) brings together multi-disciplinary state experts to address issues in the State's justice technology assets. The Group will establish standards for information and data governance to improve data collection, reporting, quality, and business processes across the enterprise.

This group will set a meeting cadence that accommodates the needs of the group and its members. Until the system assessments are complete, meetings will focus on building foundational knowledge in information and data governance and data equity, along with other key contextual subject areas. By establishing a cohort competent in information and data governance, the group will foster a shared sense of purpose and drive relationship-building. Training will provide members with opportunities to best act in their roles as advisors to their agencies and departments by building their foundational knowledge together. Information and data governance needs to be at the forefront of conversations and project implementation to ensure impact over time. Ultimately, the Group will assist in the development of rulemaking pursuant to 3 V.S.A. § 5012, to establish universal, statewide policies around data and information governance.

Once the assessments and gap analysis are completed, the Group will prioritize governance implementation for justice technology assets. They will work with the RDAP and RJISAC on legislative recommendations regarding data infrastructure and best practices for data collections.

### Data Governance Advisory Group (EquiData) Roles, Responsibilities, and Onboarding

The roles and responsibilities of the Data Governance Advisory Group (Equidata) will evolve over time, reflecting the needs of the criminal legal data landscape in Vermont. The Group will establish a charter and working plan, including timeframes for project completion and other metrics and key performance indicators, during the onboarding, teambuilding, and introductory learning phases.

Equidata membership will consist of:

	Office of Racial Equity/Division of Racial Justice Statistics (ORE/DRJS)
	Agency of Digital Services (ADS)
	Vermont State Archives and Records Administration (VSARA)
	Chief Performance Office (CPO)
	Crime Research Group (CRG)
	Center for Crime Victim Services (CCVS)
	Attorney General's Office (AGO)
	Department of Corrections (DOC)
	Department of Public Safety (DPS)
	Department for States Attorney and Sheriffs (SAS)
	Department for Children and Families (DCF)
	Vermont Crime Information Center (VCIC)
	Vermont Criminal Justice Council (VCJC)
	Office of the Defender General (ODG)
	Vermont Judiciary (JUD)
	Racial Disparities in the Criminal & Juvenile Justice Systems Advisory Panel (RDAP)
	Racial Justice Statistics Advisory Council (RJSAC)

## Create a Strategic Approach and Governance Plan

The Data Governance Advisory Group (Equidata)'s focus is creating a strategic approach to achieving the goals of the governance plan. The governance plan is the culmination of all the work gathered during the assessments and gap analyses and will be developed and refined by the Equi-data group.

The Chief Performance Office (CPO) will work with DRJS and VSARA to establish an initial list of key performance indicators and metrics mapped to each of the DRJS mandates outlined in 3 V.S.A. § 5012 and 3 V.S.A. § 5013. The DRJS' advisory bodies (RDAP, RJSAC) and the Advisory Group (Equidata) will use these performance indicators and metrics to set priorities for the DRJS adjusting as necessary.

Metrics and key performance indicators will likely coincide with many of those that are applied statewide. DRJS will be better able to evaluate data systems with consistent measurement domains in place. The DRJS, RDAP and RJSAC's mandatory reporting requirements to the legislature will inform reporting timeframes. This is to ensure the most up-to-date information is being reported to the legislature.

## Implement the Strategic Approach

The intent of the strategic approach, adapted from the CPO, aims to measure success and uncover opportunities for improvement in the DRJS' execution of mandates outlined in 3 V.S.A. § 5012 and 3 V.S.A. § 5013. The Data Governance Advisory Group will review progress quarterly, with more frequent updates as necessary.

Adaptability in the strategic approach is vital as new data systems are onboard, or additional charges are added in legislation for relevant entities in the criminal legal landscape or the DRJS. The strategic approach methodology will be incorporated into the Justice Technology Strategic Plan and reviewed annually alongside the justice technology assets inventory and data dictionary established through the gap analysis and governance assessment processes.

The Data Governance Advisory Board will be responsible for developing the annual review process and establishing how to continue to keep both the Justice Technology Strategic Plan and the governance plan of action relevant, updated, and accessible.

Moving forward, this process can be repeated for agencies that represent upstream factors leading to entrance into the criminal legal system and can be incorporated as additional considerations when discussing the larger impact on individuals who become justice-involved. The governance framework and policies developed by the Data Governance Advisory Group can be applied statewide through partnership with the ADS Enterprise Project Management Office (EPMO) team as they begin working on their larger systems administration work that will require a robust information and data governance strategy.

## CONCLUSION

### Opportunities for Improvement to Justice Technology Assets

Pursuant to 3 V.S.A. § 5012 and 3 V.S.A. § 5013, the Division is mandated to, "Work collaboratively with, and have the assistance of, all State and local agencies and departments identified pursuant to subdivision 5013(a)(2) of this title for purposes of collecting all data related to systemic racial bias and disparities within the criminal and juvenile justice systems. [...] Conduct justice information sharing gap analyses. [...]" and "develop and adopt a data governance policy and shall establish (1) a system or systems to standardize the collection and retention of the data collected pursuant to its subchapter; and (2) methods to permit sharing and communication of the data between the State agencies, local agencies, and external researchers, including the use of data sharing agreements [...]."

These mandates represent opportunities for the Division and its partners to make an impact on the criminal legal landscape and beyond. Through the Vermont State Archives and Records Administration's functional analysis process and the lens of information and data governance best practices, we can:

1. Meet the Division's statutory mandate to conduct a justice technology gap analysis
2. Gather and analyze criminal legal agency recordkeeping and data management requirements.

This gap analysis will provide the DRJS with the information it needs to develop the Justice Technology Strategic Plan, data dictionary, and track the existence of formal data-sharing agreements.

Collaborating with VSARA enables access to the Vermont Functional Classification System (VCLAS). VCLAS is a metadata-rich relational database built by VSARA records specialists over more than 15 years of research and analysis of government functions. VCLAS will be used to identify, classify, and report on legal recordkeeping, data management requirements, and relationships between agency functions. VSARA's services to state agencies are provided at no cost to the public agency partner.

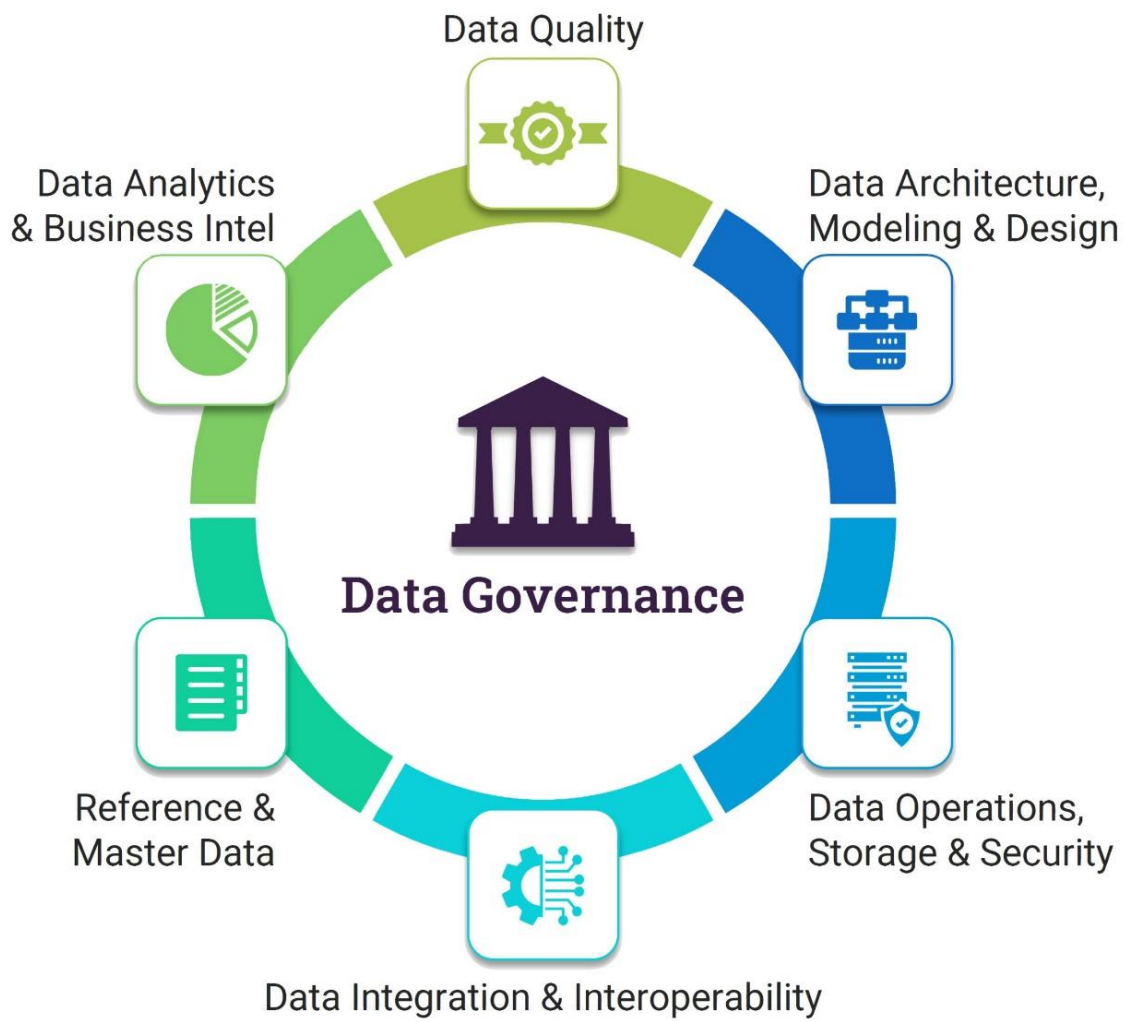
Information and data governance will be integrated into each step of the assessment process, ensuring consistency and continuity of operations in a measurable and trackable way. This thoughtful approach to governance will enable natural shifts/adjustments to occur in the work as necessary.

Our goal is to establish information standards that transform the criminal legal system and benefit all Vermonters impacted by these systems. Approaching our partners with actionable guidance that builds awareness, trust, and competency is the first of many initiatives DRJS will use to build information and data governance across all levels of the state. By bringing together interdisciplinary experts into data governance action pods, we will collectively face the challenges of Vermont's state criminal legal data landscape.

## APPENDIX

### State of Vermont's Systems Assessment Model Plan Milestones, Deliverables & Schedule

Milestone/Deliverable	Target Delivery Date	Completion Date
Plan/Scope of Work Refinement Period: Identify Stakeholders and Partners	6/9/2025 – 8/30/2025	8/13/2025
Develop a Communication Plan	7/01/2025 – 8/30/2025	9/19/2025
Refine the System Assessment Tool	7/01/2025 – 8/30/2025	9/18/2025
Establish the Data Governance Action Pod Cohorts (Kick-off meeting)	9/1/2025-12/1/2025	Phase 1: 9/16-9/18/2025 Phase 2: 10/21-10/24/2025 Phase 3: 11/19/2025-12/11/2025
Conduct System Assessment Readiness Meetings	9/1/2025 - 12/31/2025	Phase 1: 10/30-11/5/2025 Phase 2: 12/12/2025 Phase 3:
Create Technology Asset Inventory and Data Dictionary	9/1/2025 - 12/31/2025	
Gap Analysis and Reporting	10/1/20 25 - 12/31/2025	
Onboard the Data Governance Advisory Group (Cohort Foundation Sessions)	XX/XX/XX26 - XX/XX/XX26	
Create a Strategic Approach and Information and Data Governance Plan	1/1/2025 – XX/XX/XX26	
Implementing Strategic Approach	XX/XX/XX26	



# INFORMATION GOVERNANCE REFERENCE MODEL (IGRM)

*Balancing Value, Risk and Cost*

