

ANNUAL REPORT 2025-2026

In accordance with 33 VSA § 3203(a)(6)

Submitted to:

Governor Phil Scott
Vermont General Assembly

Prepared by:

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MESSAGE FROM THE ADVOCATES

The OCYFA's third annual report centers on data. **Most of the charts and tables in this report have never been previously compiled.** They show the value of the OCYFA's mandate to advocate for the humane and dignified treatment of children and families with DCF involvement. They tell important stories about the experiences of children and youth in Vermont DCF custody. And, just as importantly, they highlight what is missing and where we must build.

The underlying logic of this report is that Vermont has a real opportunity to improve its child protection and youth justice systems in a way that supports children, youth, and families, improves DCF working conditions, *and also saves millions of dollars in state general funds.*

We already know that programs and services that support children and families are also the most cost-effective for Vermont. **Incentives are already aligned to shift supports upstream.** And, as we outline on [pages 10 and 11](#), DCF has already shown the effectiveness of a data-driven, goal-oriented plan through its efforts to reduce unnecessary front-end family involvements.

But in other areas, such as youth justice, residential care, and unlicensed settings, Vermont lags behind. **We still have serious work to do.**

This report calls for the State of Vermont to go bigger, to leverage its recent successes by applying data-driven insights across the entire child welfare and youth justice systems to shift services and supports where we all agree they must go—upstream.

To do so, **we must reexamine these fundamental questions:**

- What are the goals of Vermont's child protection and youth justice systems?
- How do we know if we are achieving those goals?
- How can we adjust our practice if not?

This report suggests answers to these questions. It centers the perspectives of children, youth, and families, and includes input from all stakeholders, including DCF, AHS, the legislature, legal and community providers, and others.

Impacted families are looking to DCF and the State of Vermont to authentically reassess child welfare and youth justice from the ground up and to be transparent about where we are falling short. They are asking for a shared effort. *We can* respond.

As always, please reach out to us with your thoughts and responses.

In service,

Matthew
and
Lauren



EXECUTIVE SUMMARY

Findings and Recommendations

Data-Driven Initiatives Support Families and DCF

- Vermont's child welfare and youth justice systems must have data-driven goals tied to a clear set of principles aimed at supporting children, youth, and families. We offer our ideas on [page 9](#).
- Since 2018, DCF has demonstrated the success of one such initiative by dramatically lowering its involvement in the lives of families ([see page 10](#)). These reductions have increased well-being for children and families with no measurable decline in child safety. They have reduced the need for foster homes, the burden on courts, and the workload of DCF staff, all while saving money.
- DCF can and should leverage these successes across its entire child welfare and youth justice systems to shift services and supports upstream, starting with bolstering supports for families and kin ([see pages 10-12](#)).

How to Shift Investments Upstream

- DCF spends just 2% of its child welfare budget on prevention and 1% on child protective services, but 72% on out-of-home placements ([see page 13](#))—some of the worst rankings of any state in the nation. Vermont invests minimally in cost-effective services and programs that most benefit children and families, and maximally on the most expensive, least effective services and supports.
- Vermont's spending imbalance is driven by its reliance on congregate care and deep end systems, with locked beds in Vermont now costing upwards of \$1.5 million per bed per year ([see page 14](#)). Vermont has not reacted to shifting federal funding priorities by adjusting its state priorities. Vermont's system of care must become more responsive, less focused on containment, and less costly. Vermont must create dedicated initiatives to build out its community prevention programs, especially in youth justice.
- Vermont should face the difficult work to shift child welfare investments upstream, starting with a clear accounting of its deep-end spending and the cost effectiveness of potential alternatives. This approach would improve outcomes for children and families, reduce the need for general fund dollars, and improve working conditions for DCF employees by ensuring fidelity to DCF's child protection mission. Such a change would pay for itself in the long term.

Stopping DCF's Interception of Children's Benefits

- Amid this inefficient spending, DCF continues to intercept the survivor's benefits of children in DCF custody and use them to offset the cost of those children's foster care, despite federal pressures to stop this practice, including a recent letter to Gov. Scott from the top federal child welfare official ([see page 17](#)). We call on Gov. Scott to issue an executive order immediately stopping this practice, no matter the "cost" to DCF.

EXECUTIVE SUMMARY

Conditions of Placement

Residential Care

- Children and youth in DCF custody, who by definition have already experienced trauma, are often re-traumatized in the residential system, where documented abuses of Vermont children and youth occur repeatedly.
- As of a point-in-time count in October 2025, 89 children and youth in DCF custody were in approximately 45 residential programs, up from 83 children a year ago. In the 2025 count, fewer youth had been in their program 12-18 months compared to 2024, more had been in their program fewer than 6 months, and the number staying more than 18 months had almost doubled, from 6 to 11, with the longest length of stay at more than 1200 days, or almost three and a half years.
- Ten children under 10 years of age were in residential programs as of October 1, 2025, with an average length of stay of 241 days. These children experienced an average of 13 restraints each. [See pages 19-20.](#)

Restraints and Seclusions

- DCF's current data systems do not track comprehensive, child-centered, actionable data on children restrained or secluded, children placed in adult facilities, children injured while in DCF custody, children in unlicensed "staffing" settings, or children missing from DCF custody. DCF has not committed to including mechanisms for reporting this data to OCYFA in its new CCWIS data system.
- This report presents the most comprehensive data on restraints and seclusions of children in DCF custody in Vermont's history. [See pages 23-26.](#) 461 total instances of restraint or seclusion were identified in 2025, with 17 programs reporting at least one instance. 57 unique children and youth were involved in the 461 instances, an average of eight instances per child. Thirteen children experienced 10 or more restraints or seclusions. Transgender youth experienced at least 13% of all restraints in 2025. Children under 10 years of age experienced an average of 22.5 restraints or seclusions each and 70% of all seclusions.
- Several serious injuries related to restraints were reported, including broken bones, ingested glass, and serious medical episodes. Chemical restraint was used at least once.

Injuries to Children and Youth

- In 2025, DCF reported 47 individual instances of injury involving 38 unique children and youth to the OCYFA. Evidence of self-harm was the highest injury category in 2025, as it was for 2024. The average age for children in self-harm incidents was 15.8.
- Injuries varied from relatively minor, like suspected broken bones, to serious medical episodes requiring hospital stays, and one fatality. [See page 28.](#)

Children and Youth Missing from DCF Custody

- In 2025, DCF reported 32 individual youth as missing across 54 total incidents. Ten youth had more than one missing incident, accounting for 32 total missing incidents with an average time missing of 153 days. The aggregate average age on the day the youth went missing was 15 years old. At least 22% of youth who went missing were Black, Indigenous, or Persons of Color.
- Most of these youth elope from residential programs. This cohort presents multiple safety concerns, including an elevated risk of trafficking. [See page 29.](#)

EXECUTIVE SUMMARY

Conditions of Placement

“Staffings” of Children and Youth

- A “staffing” is an unlicensed, unregulated place where children are isolated, with no access to education, treatment, peer interactions, or community engagement.
- DCF began developing these settings following the closure of Woodside, in a time when Vermont had sufficient residential capacity. “Staffing” settings exist because Vermont has not built programming, including preventive, upstream supports, that is *responsive* to the needs of children and families.
- DCF did not respond to multiple OCYFA requests for data on 2025 “staffings” of children and youth. The OCYFA used its access to DCF databases to analyze 2025 “staffings” at four unlicensed settings, finding 40 total episodes at these programs that included 23 unique children and adolescents. The longest isolation lasted 27 days and the average duration was 13 days. [See page 30.](#)

Locked Facilities

- Locked facilities for children and youth are some of the most expensive, inefficient, and racially inequitable investments a state can make in children. Vermont must double-down on the development of preventive services in the field of youth justice.
- From October 2024 to October 2025, twenty individual youth were placed at Red Clover Treatment Center, with an average length of stay of 56 days and an average age at first admission of 15.8 years old. Four of the 20 youth were from Massachusetts. The racial demographics of this cohort are unclear.
- The State has presented no quantitative data to back the 15-bed capacity of its proposed new locked youth detention facility, Green Mountain Youth Campus. The data we *do* have suggests that 15 beds may be far too many: the current, four-bed Red Clover facility was full only 58% of the time in 2025. [See pages 31-32.](#)

Conclusion

- A data-backed, goal-oriented vision for Vermont’s child welfare and youth justice systems is possible *now*. DCF and its partners, including OCYFA, can begin improving data collection and transparency immediately, using existing systems. Reenvisioning DCF’s data practices, not just its data systems, is integral to this transformation. Positive change that centers children, youth, and families, is within our reach. [See page 33.](#)

EXECUTIVE SUMMARY

2025 Key Recommendations

1. DCF should present **clear spending and budgetary data** on each part of its child welfare and youth justice systems, including preventive services, kin placements, non-kin family foster homes, unlicensed settings, and congregate care.
2. DCF should **finalize and submit a separate kin licensing rule** by the end of 2026.
3. DCF should calculate and publish itemized **costs of its congregate and locked facilities**, including Red Clover Treatment Center and the planned Green Mountain Youth Campus, and should track and publish utilization and cost data of youth detained in adult facilities.
4. The Agency of Human Services should create a policy plan for **doubling evidence-based prevention services in youth justice** over the next five years.
5. Gov. Scott should issue an executive order **ending DCF's practice of using children's social security benefits to offset Vermont's child welfare agency costs**.
6. The State of Vermont should **pause its plans to build a new locked youth facility until we have clear data on need and cost**, including the pending NCJJ report.
7. DCF should create and publish a data-driven plan to **end all "staffings" of children by 2027**.
8. The Vermont legislature should require DCF to create a public dashboard, updated monthly, with aggregate **restraint and seclusion data for all programs**, in state and out, serving Vermont children and youth.
9. The Vermont legislature should **ban the use of dangerous and harmful restraint and seclusion practices on children and youth**, such as prone restraints, chemical restraints, and strip searches.
10. The Vermont legislature should **explore improved independent oversight and due process mechanisms for children and families related to restraint and seclusion**, including enhanced notice of rights requirements to children and youth, and requirements for independent reviews of program quality if a child is frequently restrained or secluded.

OUR WORK IN 2025

"I feel heard. You are helping me. I feel like the whole system is against me."

- Parent Caller to the OCYFA

- **We responded to 163 unique complaints** in 2025, a 21% increase over 2024 and more than double the number of cases in 2023.
- **We moved to a more family-friendly office space and developed a cutting-edge internal case handling system** to streamline OCYFA responses to complaints and analyze statewide data.
- **We worked to ensure that former foster youth received full access to their DCF and court records** pursuant to Act 173 of 2024.
- **We engaged local and national experts, and provided trainings, outreach, and presentations** to diverse entities, including the Vermont NASW School Social Worker Chapter, the Agency of Education McKinney-Vento Liaisons, the Vermont Child Health Improvement Program (VCHIP), and the Vermont Bar Annual Meeting.
- **We built a roadmap for pre-petition, multidisciplinary legal advocacy** for Vermont families impacted by child welfare, including those with active or historical opioid use.
- **We continued to work collaboratively with DCF, the Defender General, and others** to support drawdowns of Title IV-E funds for the legal representation of children and families.
- **We continued to advocate for full implementation of Raise the Age**, Vermont's landmark law to reduce recidivism and lower costs in the youth justice system.
- **We convened and supported the OCYFA Advisory Council** to bring youth and family voice to discussions about reforming Vermont's substantiation system, pursuant to Act 154 of 2024.



L. to R.: Deputy Advocate Lauren Higbee, DCF Juvenile Justice Specialist Sheri Lynn, and Vermont Judge Katherine Hayes (retired), at the 2025 Youth Justice in Action Conference in Minneapolis, MN.



Advocate Matthew Bernstein with Advisory Council member Celine Davis at the Dawg Bowl food truck during the 2025 NACC Conference, Cleveland, OH.

FIRST PRINCIPLES: WHAT ARE THE GOALS OF VERMONT'S CHILD WELFARE AND YOUTH JUSTICE SYSTEMS?

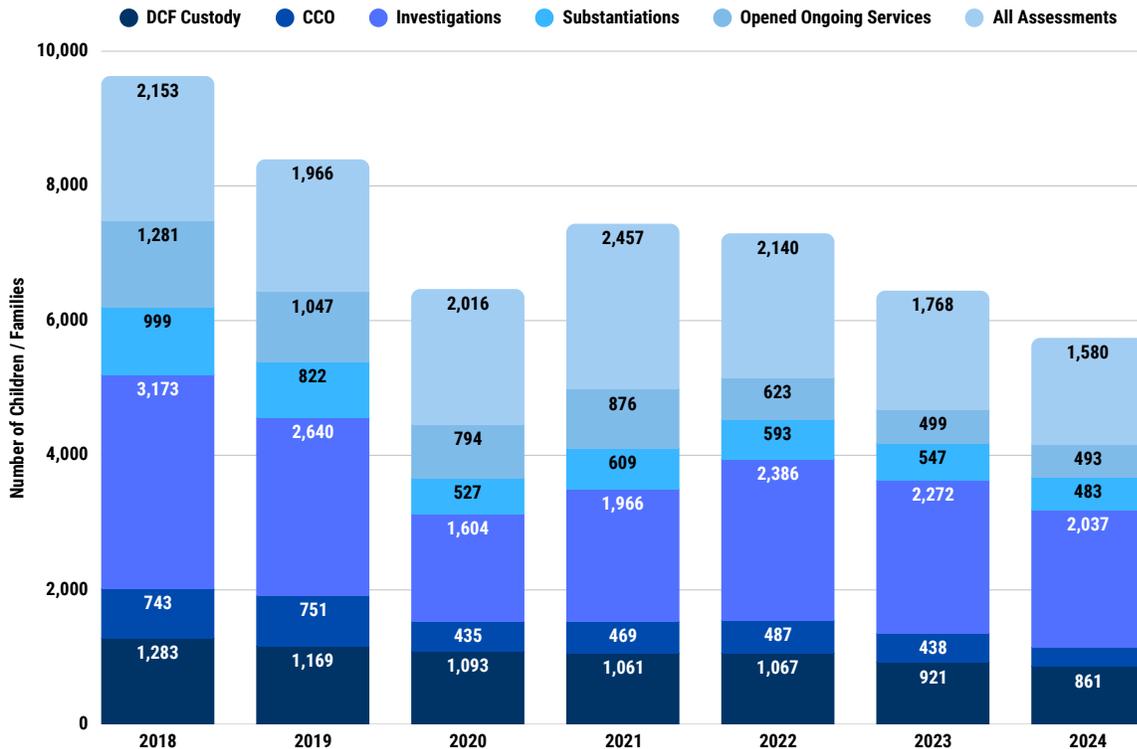
This page contains our attempt to articulate a set of shared principles for Vermont's child welfare and youth justice systems. We believe these ideas can form the basis of the goal-oriented, data-driven plans we discuss throughout this report. Please reach out with your ideas.

- **Children and families do best when they are supported** in their homes and communities.
- **Child removal, no matter the reason, inflicts trauma on children and families.** It should be used only as a last resort when children cannot remain safely at home.
- When the state intervenes, **families have a right to due process** through high quality, multidisciplinary, early legal advocacy.
- If children are removed and cannot safely return home, **placement with kin is the goal.** If placement with kin is not possible, the next best option is a family foster home.
- If used, **congregate care placements should be seen as temporary** and frequently reviewed with the direct input of the child and family.
- **Unlicensed "staffing" placements that isolate children inflict undue disruption and must end.**
- An effective youth justice system **protects public safety**, connects young people to age-appropriate services, and shields them from the adverse impacts of a criminal record.
- Our youth justice systems must center **investments in programs, services, and supports that help young people achieve success in their homes and communities**, and that prevent the need for locked or carceral settings. **Our spending should reflect our priorities.**
- **Vermonters must share a commitment** to reduce disproportionalities in child welfare and youth justice outcomes based on race, gender identity, disability status, and economic circumstances.
- **Confidentiality should support children, youth, and families**, not be used against them. Increased transparency in our child welfare and youth justice systems is long overdue.
- Changing the status quo requires **intentional, goal-driven planning.**
- Individual and systemic decisions about children and families must be made **with their input.**
- Positive individual and systemic **change is possible.**

FINDINGS AND RECOMMENDATIONS: DATA-DRIVEN INITIATIVES SUPPORT FAMILIES AND DCF PRIORITIES

- **Historically, child welfare authorities in Vermont have been overinvolved in the lives of families.** In the modern era, this has meant excessive removals of children from their parents’ care, resulting in trauma to families and inefficient use of state resources.
- Since 2018, however, **a cultural shift has emerged in Vermont**, mirroring national trends. Through an intentional, data-driven initiative, **DCF has made significant progress in lowering unnecessary interventions into family autonomy.** This has been achieved through a project to ensure that child safety—not economic insecurity or other factors—is at the core of decisions regarding child removal.
- The results of this initiative are visible across several data categories. From 2018 through 2024:
 - Children in DCF Custody **Down 33%**
 - Children on Conditional Custody Orders (CCOs) **Down 84%**
 - DCF Investigations **Down 40%**
 - Substantiations **Down 70%**
 - Cases Opened for Ongoing Services **Down 74%**
 - Assessments **Down 21%**

DCF Involvement with Families, 2018-2024



Source: DCF Annual Child Protection Reports

FINDINGS AND RECOMMENDATIONS: DATA-DRIVEN INITIATIVES SUPPORT FAMILIES AND DCF

- While it may seem counterintuitive, **these reductions have resulted in increased well-being** for children and families, and no measurable decline in overall child safety. DCF has aligned its front-end goals with those of families, saving an unmeasured amount of general fund dollars in the process. There are many other parts of the child welfare and youth justice systems that would benefit from this approach.
- The successful implementation of this intentional, data-driven strategy has led to:

- **Reduced need for foster homes**
- **Reduced burden on courts**
- **Budgetary savings**
- **Historically low DCF worker caseloads**

- This structural shift is part of a national trend. During this same period—from 2018 through 2024—the number of children in foster care nationwide has dropped 23 percent. **More than 100,000 fewer children were in foster care in the United States in 2024 than in 2018**—again, with no measurable decline in overall child safety. As a result, while Vermont has lowered the total number of children in foster care each year, it has consistently ranked as the 6th highest state in foster care rate per capita—showing that Vermont still has more work to do to reform its child welfare systems.

| Year | Foster Care Rate Per 1,000 | VT National Rank |
|------|----------------------------|------------------|
| 2017 | 10.6 | 6th |
| 2018 | 11.1 | 6th |
| 2019 | 10.7 | 6th |
| 2020 | 9.4 | 7th |
| 2021 | 8.8 | 6th |
| 2022 | 9.2 | 6th |
| 2023 | 8.5 | 6th |

| Year | Vt Foster Homes | Vt Foster Children | Ratio |
|------|-----------------|--------------------|-------|
| 2020 | 1,335 | 1,093 | 1.22 |
| 2021 | 1,135 | 1,061 | 1.07 |
| 2022 | 956 | 1,067 | 0.90 |
| 2023 | 821 | 921 | 0.89 |
| 2024 | 811 | 861 | 0.94 |

- Another metric that can be used to track Vermont’s progress toward its goals is the state’s ratio of foster homes to foster children. In late 2025, the federal Administration for Children and Families announced its intention to “leverage all \$11.4 billion of its annual federal funding for foster care and child welfare” to “**ensure we are doubling down on prevention** to keep families intact whenever it’s safe to do so, while ensuring there are enough loving foster homes available for any child who needs one.” ACF uses this metric to track this progress.
- The metric **unites the interests of DCF and impacted families** by showing both the positive impact of reductions in the number of children coming into foster care described above (the denominator) and the negative impact of Vermont’s declining foster homes (the ratio’s numerator). Last year saw the first uptick in the ratio in at least five years—a direct result of the steep declines in children coming into custody, which outweighed the decline in available foster homes.

FINDINGS AND RECOMMENDATIONS: VERMONT MUST INCREASE INVESTMENTS IN FAMILIES AND KIN

- Research consistently demonstrates that economic and concrete supports that go directly to families can keep children out of foster care. **Kin caregivers, many of whom are raising children outside of DCF custody, are crucial to preventing the need for foster care and expanding foster home availability.**
- Studies show that children living in kinship homes have fewer harmful behaviors, improved well-being, and greater placement stability than children in non-kin placements. Programs that search for relatives and fictive kin following child welfare agency involvement can save states over \$10,000 for each child involved.
- **Vermont does not track data on kin savings**, but Idaho, for example, found that it spent \$16 per day on kinship care as opposed to \$385 per day on congregate care.
- As we discussed in our [annual report last year](#), the number of licensed kin caregivers in Vermont declined by over 40% from 2020 to 2024. **Unlicensed kin caregivers, including those participating in safety plans, conditional custody orders, and informal caregiving, do not receive foster parent maintenance payments and must subsidize foster care costs on their own**, and they have virtually no access to vital social work or legal support.
- As noted in our previous two annual reports, a federal rule change now allows states to create separate licensing standards for kinship foster family homes from those for non-kinship foster family homes and requires that kin receive the same amount of foster care payments as non-kin. **This is a crucial tool states can use to promote equity and ensure child safety.**
- Last year we noted that seven states and three tribes had new kin rules approved by the federal Children’s Bureau. Just a year later, 16 states and 6 tribes have approved rules, **more than doubling the rate of passage** and demonstrating the utility of these rule changes for states.
- By its own admission, DCF has taken little action to submit a new kin licensing rule over the last two years, despite the low cost and high benefits of doing so. As a result, however unintentionally, DCF has increased its own capacity in part by relying on uncompensated kin. **Immediate development of a kin licensure rule is an equity issue that should be a top DCF priority.**

OCYFA RECOMMENDATIONS

DCF should finalize and submit a separate kin licensing rule by the end of 2026

DCF should reinvest in kin finding and economic support initiatives

DCF should calculate and publish the monthly ratio of foster homes to foster children and the percentage of foster children placed with kin

FINDINGS AND RECOMMENDATIONS: HOW TO SHIFT INVESTMENTS UPSTREAM

- Vermont spends more than \$106 million each year on its child welfare systems.
- About \$50 million (45%) of this total is comprised of state general funds, **the biggest proportion of any funding source**. Two federal sources—Medicaid (23%) and Title IV-E (20%)—comprise the bulk of the remaining spending.
- DCF spends just 2% of its child welfare budget on prevention and 1% on child protective services, **but 72% on out-of-home placements**. Among states, Vermont is fourth lowest in state dollars spent on prevention, second lowest in child protective services, third *highest* in out of home placements, and second highest in state spending on older youth.

In other words, Vermont’s state spending on child welfare is upside down. Vermont invests minimally in cost-effective programs proven to benefit children and families, and maximally on the most expensive, least effective services and supports.

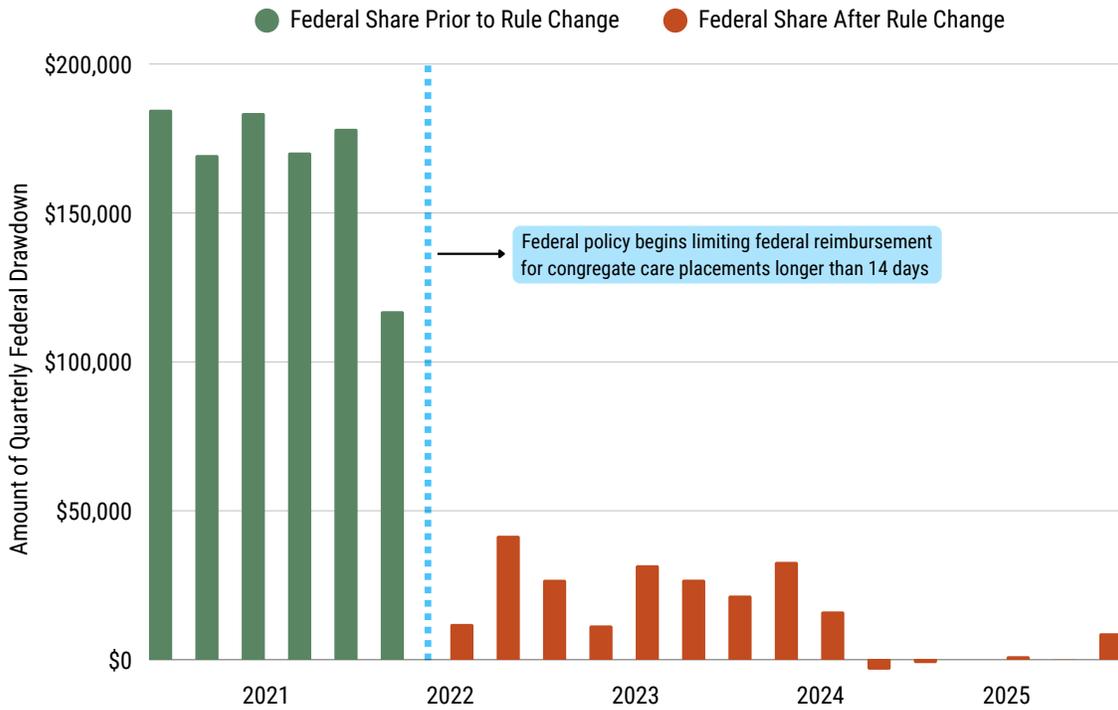
| Vermont Child Welfare Spending, State General Funds | | |
|---|---------------------------|-----------------------|
| State General Funds | Sector | Rank Among States |
| 2% | Preventive | 4th lowest |
| 1% | Child Protective Services | 2nd lowest |
| 72% | Out-of-Home Placements | 3rd highest |
| 14% | Adoption & Guardianship | Average - 13th lowest |
| 11% | Older Youth | 2nd Highest |

- upstream, low VT investments
- significant general fund reliance
- VT drawing down few federal funds

- **Vermont’s spending imbalance is driven by its reliance on congregate care and deep end systems.** Since 2021, the federal government has intentionally reduced reimbursements for congregate care placements due to the poor outcomes of youth in these settings ([see next page](#)). Vermont has not reacted to this new fiscal reality by lowering its reliance on congregate placements, instead seeking general fund budgetary increases to expand Vermont’s residential system in the name of “increasing capacity” to “ease systemic pressure.” As a result, **Vermont’s system of care has become vastly more expensive.**
- In contrast to its efforts to reduce child custody rates and other front-end interventions, described on [pages 10 and 11](#), we see little targeted effort to reduce the need for congregate care or build more preventive services. **In the field of youth justice, it appears that the State of Vermont has no policy team or plan dedicated to developing supportive, community-based services** to compliment the state’s commitment to deep end systems.

FINDINGS AND RECOMMENDATIONS: HOW TO SHIFT INVESTMENTS UPSTREAM

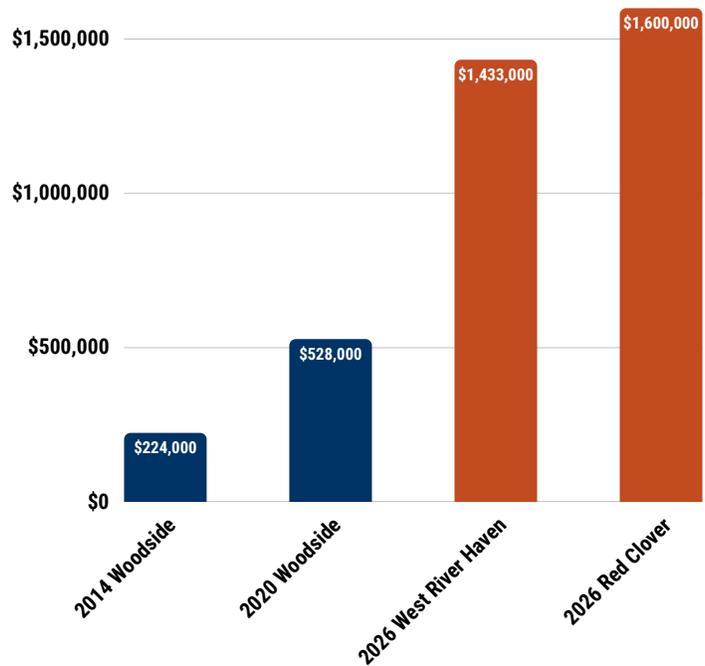
Federal Title IV-E Reimbursements to Vermont for Congregate Care



Vermont has approached its most expensive and least effective programs for children without a data-driven plan to right-size state investments and reduce the need for locked facilities through upstream supports.

- **The most expensive sector of Vermont’s congregate system is acute facilities** such as Red Clover Treatment Center and the proposed Green Mountain Youth Campus. In our 2024 Annual Report, we estimated that each acute bed would cost \$771,000 per year in 2026, but a subsequent **DCF report estimated the FY26 costs of each bed at Red Clover at more than \$1.6 M per year**, and a recently signed DCF contract for a three bed congregate facility, West River Haven, allows DCF to pay up to \$1.43 million per bed per year.

Vermont Cost of One Acute Bed, Per Year



FINDINGS AND RECOMMENDATIONS: HOW TO SHIFT INVESTMENTS UPSTREAM

- **State investments in congregate, unlicensed, and locked placements are marked by opacity.** DCF does not report on how much it spends on residential care each year, nor whether those investments lead to improved outcomes for children and youth. **DCF has never presented quantitative data to support the size or scope of its proposed 15-bed capacity of Green Mountain Youth Campus,** nor has it clearly presented dedicated cost breakdowns, including construction, operations, financing, and contract buyout costs. The lease-build strategy the State of Vermont plans to utilize apparently does not require legislative appropriation or approval, yet it obligates taxpayers to decades of payments for a brick-and-mortar facility that may be too big the moment it is built. While DCF asserts that the GMYC plan “is intentionally unlike Woodside,” the OCYFA’s constituents, including former Woodside residents, have pointed out the many resemblances to the former facility.

The State of Vermont should reconsider its decisions to invest deeply in locked facilities that warehouse children at enormous taxpayer expense, especially without a plan to reduce the need for these “last resort” interventions.

- **Vermont should face the difficult work to shift child welfare investments upstream.** Doing so would improve outcomes for children and families, reduce the need for general fund dollars, and improve working conditions for DCF employees by ensuring fidelity to DCF’s child protection mission. **Such a change would pay for itself in the long term.**

OCYFA RECOMMENDATIONS

DCF should present clear spending and budgetary data on each part of its child welfare system, including preventive services, kin placements, non-kin family foster homes, unlicensed settings, and congregate care

The Agency of Human Services should create a policy plan for doubling evidence-based prevention services in youth justice over the next five years

DCF should calculate and publish monthly itemized costs of its congregate locked facilities, including Red Clover Treatment Center and Green Mountain Youth Campus

Spotlight on the Child, Youth, and Family Advisory Council

"The Advisory Council's membership shall reflect the growing diversity of Vermont's children and families, including individuals who are Black, Indigenous, and Persons of Color, as well as with regard to socioeconomic status, geographic location, gender, sexual identity, and disability status. Members shall provide advice and guidance to the Office..." - 33 VSA § 3205

The OCYFA Advisory Council is comprised of nine community members who have been directly impacted by DCF. In 2025, the Council focused on providing input and feedback regarding Act 154 of 2024, which revamped Vermont's Child Protection Registry. One highlight of 2025 was a joint Council meeting with DCF officials.

Advisory Council members have lived expertise on a variety of topics, including:

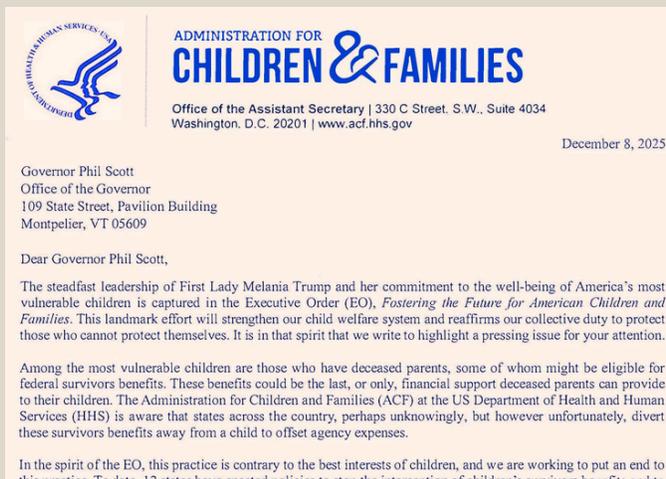
- Supporting parents who use substances
- Sitting with risk through enhanced safety planning
- Supporting alternative education programming
- Disability advocacy and accommodations
- Residential placements and length of stay in custody
- Investigative reform and preventing unnecessary removal from home of origin
- Support for older youth aging out of DCF custody
- Providing permanency for children in care



Advisory Council members, clockwise from top left: Ashley Nutbrown, Ariel Beaulac, Mike Maughan, Mercedes King, Melanie Hudson, Nate Hine, Celine Davis, Shylo Bourdeau, Angel Mason

Spotlight on OCYFA Individual Support: Preserving Social Security Benefits for Children in DCF Custody

- The OCYFA worked on 18 cases in 2025 in which social security benefits for a young person were at issue, compared to just three cases in 2024.
- It has been the historical practice of child welfare agencies, including Vermont DCF, to screen children in foster care for federal benefits, such as survivorship benefits if their parent is deceased, or disability benefits related to the parent or child's disability. If the child qualifies for these benefits, DCF usually becomes the child's payee, despite federal guidelines saying that states should be payees of last resort. DCF then uses these benefits to offset the cost of foster care for the youth while they are in state custody.
- This practice means that children with disabilities or deceased parents subsidize the cost of their foster care, while children who don't have a disability or a deceased parent do not.
- A national movement to change these practices has emerged, with at least 12 states reversing course in the last few years through executive orders or legislation. These states' child welfare agencies now allow children to access their benefits while they are in custody or conserve them until the child is able and ready to use them.



- In late 2025, the top federal child welfare official sent letters to 39 states, including Vermont, asking that they “stop the interception of children's survivors benefits and ... conserve them for the child's unmet needs.”
- DCF estimates that changing this practice in Vermont would create an annual budgetary deficit of approximately \$488,000—a relatively small sum given DCF's hundred-million-dollar budget.

The OCYFA calls on Gov. Scott to issue an executive order ending the practice of using children's benefits to offset Vermont's child welfare agency costs.

OCYFA Individual Case Spotlight: Supporting a 17-Year-Old in Obtaining their Benefits

The OCYFA supported a 17-year-old young person who returned to Vermont from an out-of-state residential program. They sought to become their own payee for their survivor's benefits after the death of their parent, and to apply for benefits based on their own disability. They needed to get an ID, create a bank account, and complete additional paperwork once they turned 18. The process was cumbersome, the terminology confusing, and they were given conflicting information. The OCYFA provided logistical support so that the young person could feel safe and empowered to make their own decisions.

Spotlight on OCYFA Systemic Support: JCAMP Grant

In 2025, the OCYFA led a multidisciplinary team that was one of eight sites nationwide awarded the prestigious JCAMP grant, worth over a million dollars over five years.

- JCAMP (Judicial Court and Attorney Measures of Performance) is a federally funded child welfare quality improvement program that helps states enhance court and professional practice across five categories: family engagement, due process, high-quality legal representation, safety, and permanency.
- The OCYFA developed and led Vermont's project in collaboration with DCF, Legal Services Vermont, the Janet S. Munt Family Room, the Chittenden County State's Attorney, and a PhD independent data expert. The project would have provided, for the first time in Vermont, civil legal wraparound services for Vermont families with child welfare involvement, generated high quality data measuring the effects of those services on child welfare outcomes, and created a pathway for Vermont to draw down federal Title IV-E reimbursements for the legal representation of children and parents for the first time.
- The project's goals were to:
 - Demonstrate the effectiveness of multidisciplinary legal models that include peer partners, social workers, paralegals, investigators, and other family supports.
 - Reduce the number of child welfare cases filed in Vermont.
 - Improve outcomes in CHINS cases through increased reunification rates, shortened permanency timelines, and improved family engagement.
 - Elevate family voice through improved access to information, "pre-petition" legal advocacy, and enhanced due process for families experiencing child welfare legal systems.
 - Improve child welfare legal practice in Vermont through capacity building, data analysis, and connection to a national community of experts.
- The grant was awarded by the Trump administration in February of 2025 and the project began implementation.



Lauren and Matthew with New Mexico Office of Family Representation and Advocacy leaders at the NCJFCJ training in Boston, April 2025.

- In April of 2025, OCYFA and Legal Services Vermont team members attended a training in Boston on early legal advocacy sponsored by the National Council of Juvenile and Family Court Judges and the American Bar Association Center on Children and the Law.
- While at this training, OCYFA staff received notice that the administration had canceled all eight JCAMP projects nationwide with no explanation.

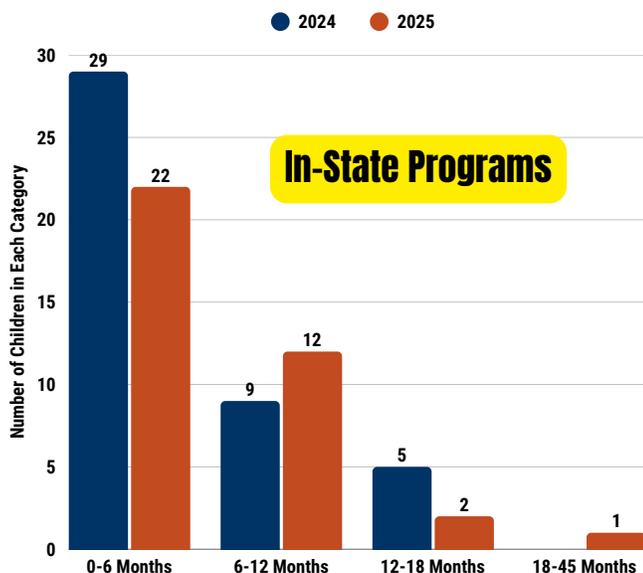
CONDITIONS OF PLACEMENT: CHILDREN AND YOUTH IN RESIDENTIAL CARE

“If the Child, Youth, and Family Advocate determines that doing so advances the welfare of a child or youth, the Advocate and Deputy Advocate may: (1) communicate privately and visit with any child or youth who is in the custody of the Department...Facilities and providers delivering services to children and youths shall permit the Child, Youth, and Family Advocate or the Deputy Advocate to access their facilities.”

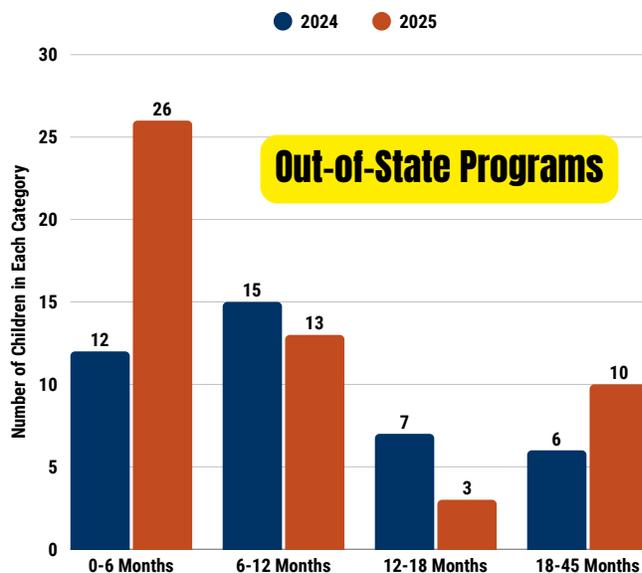
—33 VSA § 3207(b) and (c)

- Vermont has long relied on its residential care system to accept children in DCF custody for whom it had no other placement. While some programs provide quality supports for children and youth, many function as placements of last resort, seen as the “only option” or as “better than” less desirable alternatives, such as unlicensed “staffing” settings (see page 30). **Children and families continue to call for a plan to reduce the need for all forms of congregate care.**
- Children and youth in DCF custody, who by definition have already experienced trauma, are often re-traumatized in the residential system, where documented abuses of Vermont children and youth occur repeatedly.
- At the federal level, **a bipartisan consensus affirms the ineffectiveness of the residential care system** and the harm it can do to children and youth. As a result, federal reimbursements available for children placed in congregate care have sharply declined over the last five years, and it is likely this trend will continue. See page 14.
- As of a point-in-time count in October 2025, 89 children and youth in DCF custody were in approximately 45 residential programs, up from 83 children a year ago. In the 2025 count, fewer youth had been in their program 12-18 months compared to 2024, more had been in their program fewer than 6 months, and **the number staying more than 18 months had almost doubled**, from 6 to 11, with the longest length of stay at more than 1200 days, or almost three and a half years.

Vermont Children in Residential Programs
Length of Stay, Point in Time Count



Vermont Children In Residential Programs
Length of Stay, Point in Time Count



CONDITIONS OF PLACEMENT: CHILDREN AND YOUTH IN RESIDENTIAL CARE

Children Under Ten Years Old in Residential Care

- Of particular concern are children under ten years old placed in residential care. Ten such children were in residential programs as of October 1, 2025, five placed out of state and five in Vermont. **Their lengths of stay ranged between 38 days and 903 days**, with an average length of stay of 241 days. These children experienced an average of 13 restraints and seclusions each. As we discuss on [page 22](#), **children under ten in residential care are disproportionately restrained and secluded.**
- Visiting facilities and speaking with children and youth is essential to understanding program quality, child safety, and state spending. The OCYFA is the only independent state entity empowered to do so, but our two-person office can only visit a few programs each year.

Children Under Ten Years of Age in Residential Care, By Length of Stay, October 2025

| Child | Length of Stay, Days | Program State | Age at Placement | Age in October 2025 | Gender | Restraints and Seclusions Known |
|----------------|----------------------|---------------|------------------|---------------------|--------|---------------------------------|
| 1 | 903 | NH | 8 | 11 | F | 0 |
| 2 | 542 | MA | 6 | 8 | M | 0 |
| 3 | 283 | VT | 7 | 8 | F | 23 |
| 4 | 168 | NH | 9 | 10 | M | 26 |
| 5 | 140 | VT | 9 | 10 | M | 0 |
| 6 | 134 | VT | 7 | 8 | M | 44 |
| 7 | 93 | NH | 9 | 9 | M | 0 |
| 8 | 66 | VT | 8 | 9 | M | 0 |
| 9 | 45 | VT | 7 | 8 | M | 0 |
| 10 | 38 | NH | 9 | 9 | F | 39 |
| Average | 241 | | 8.3 | 9 | | 13 |

CONDITIONS OF PLACEMENT: RESTRAINTS AND SECLUSIONS OF CHILDREN AND YOUTH IN DCF CUSTODY

“Restraint, Physical: The application of physical force by one or more individuals that reduces or restricts the child/youth’s freedom of movement, including an escort.”
– Licensing Regulations for Residential Treatment Programs in Vermont

“Seclusion: (However named) is the confinement of a child/youth in a segregated room, for the purpose of preventing harm to self or others, with the child/youth’s freedom to leave physically restricted...”
– Licensing Regulations for Residential Treatment Programs in Vermont

- **Restraint and seclusion injure, traumatize, and sometimes kill children.** They were designed as last resort interventions. Neither has a therapeutic basis. National data shows that **restraint and seclusion are used disproportionately on Black and Brown children, children with disabilities, and other marginalized groups.** DCF does not reliably track racial data on restraints and seclusions.
- Vermont law requires DCF to notify the OCYFA of all instances of restraint or seclusion of any child or youth in DCF custody. Separately, since at least 2011, foster care and residential treatment regulations have required providers to meet certain standards, including reporting every instance of restraint and seclusion to DCF and families and custodians. **Vermont law does not require reporting to attorneys, GALs, or education decision makers.**
- DCF improved its reporting system to OCYFA in 2025. Individual DCF employees care about this issue and want to improve reporting, but longstanding structural and systemic barriers continue to impede progress. **The OCYFA estimates that there continue to be hundreds of unreported restraints and seclusions of children in DCF custody** across multiple settings.
- Restraint and seclusion reports are written in multiple formats, are sent via different forms and methods, and contain inconsistent data categories. For example, some reports have incident start and end times, some indicate the incident duration directly in minutes, and most have no duration information at all. Sometimes multiple separate restraints or seclusions are reported in a single, narrative paragraph. **The lack of a cohesive reporting system puts the onus on OCYFA to compile and standardize this data,** resulting in significant data entry work for OCYFA staff.
- Through our direct access to DCF data systems, **the OCYFA found and responded to at least 30 instances of restraint or seclusion that were already documented in DCF case notes but had not been reported to the OCYFA.**
- DCF did not include requirements for restraint and seclusion tracking and reporting in the blueprint for its new CCWIS data system.
- **A standardized, simple, and efficient restraint and seclusion reporting system could be created in 2026 using existing resources** and is worth initiating immediately, rather than waiting for the implementation of DCF’s planned CCWIS data system.
- Despite these deficiencies, **the following pages contain the most detailed picture of restraint and seclusion of children in DCF custody in Vermont’s history.**

CONDITIONS OF PLACEMENT: RESTRAINTS AND SECLUSIONS OF CHILDREN AND YOUTH

The Data

- **461 total instances of restraint or seclusion were identified by DCF and OCYFA in 2025**, compared to 324 in 2024 and 92 in 2023. 17 total programs reported at least one instance, compared to four in 2024 and one in 2023. See [Table 1, next page](#).
- 57 unique children and youth were involved in the 461 instances, an average of eight instances per child. The youngest child was six at the time of the incident, and the oldest was 17 and a half. **Thirteen children experienced 10 or more restraints or seclusions.** The median age for the 461 instances was 13. In 20 instances, the OCYFA was unable to identify the child in the report based on the information received.
- 210 instances (46%) had a known duration. 251 (54%) had an unknown duration. Of those with a known duration, the average duration time was 22 minutes, and the median and mode were both 10 minutes.
- **Transgender youth experienced at least 13% of all restraints in 2025 (52/386).**
- Several serious injuries related to restraints were reported, including broken bones, ingested glass, and serious medical episodes. **Chemical restraint was used at least once.** Several incidents resulted in reports to out-of-state child protection hotlines.
- Again in 2025, **DCF reported no restraints or seclusions from the Brattleboro Retreat** secure inpatient psychiatric program, despite the known routine occurrence of restraint and seclusion in that program. DCF also sent no incident reports from settings other than residential care, such as foster homes, adult detention facilities, and schools not attached to residential programs.
- **More than 130 instances were not reported to the OCYFA until at least 30 days after the incident occurred.** At least 182 reports were undated, or it was impossible to determine the date the program wrote the report given the information OCYFA received.
- **In at least one incident, an out-of-state facility recorded a video of a restraint incident but refused to provide it to DCF or OCYFA upon request.**

Restraints and Seclusions of Children Under Ten Years Old

- Children under 10 years of age experienced a disproportionate number of restraints and seclusions in 2025, comprising 11% of children (6 out of 57) but 29% of instances (135/461).
- Six children under 10 years old experienced 135 total instances of restraint or seclusion—88 restraints and 27 seclusions—**an average of 22.5 restraints or seclusions per child.** One child experienced 21 restraints and 23 seclusions before their eighth birthday. One of these seclusions lasted 60 minutes. See [Table 3 on pages 24-26](#).
- At least 23% (31 of 135) of instances involving children under age 10 were not reported to the OCYFA. Rather, OCYFA found the incidents through an examination of DCF case notes. Of those that were reported, 53 instances of restraint or seclusion of children under 10 years of age were reported to the OCYFA more than 30 days after the incident occurred.
- **Children under 10 experienced 70% of all seclusions known to the OCYFA in 2025 (47/67).**

Table 1. Restraints and Seclusions Known, Alphabetical by Program, 2025

| Program Name | Prog. State | R/S Total | Restraints | Seclusions | # Unclear | # Youth in Incidents | Avg. Age at Incident |
|------------------------------------|-------------|------------|------------|------------|-----------|----------------------|----------------------|
| 204 Depot | VT | 52 | 52 | 0 | 0 | 14 | 14 |
| 206 Depot | VT | 24 | 24 | 0 | 0 | 5 | 14 |
| Abigail Rockwell Children's Center | VT | 24 | 24 | 0 | 0 | 2 | No data |
| Cardinal Cushing Centers | MA | 1 | 0 | 0 | 1 | 1 | 13 |
| Community House | VT | 162 | 98 | 64 | 0 | 6 | 9 |
| Devereaux | FL | 6 | 6 | 0 | 0 | 1 | 12 |
| Easter Seals New Hampshire | NH | 17 | 17 | 0 | 0 | 6 | 14 |
| GAP - Girls Adolescent Program | VT | 82 | 82 | 0 | 0 | 11 | No data |
| Gulf Coast Treatment Center | FL | 7 | 7 | 0 | 0 | 2 | 16 |
| Jarrett House | VT | 3 | 1 | 2 | 0 | 2 | 8 |
| Mount Prospect Academy - ERT | NH | 3 | 3 | 0 | 0 | 2 | 17 |
| Mount Prospect Academy - Hall Farm | NH | 2 | 2 | 0 | 0 | 1 | 14 |
| Mount Prospect Academy - Subacute | NH | 13 | 13 | 0 | 0 | 2 | 13 |
| Red Clover | VT | 9 | 8 | 1 | 0 | 5 | 16 |
| Sandy Pines | FL | 14 | 9 | 0 | 5 | 3 | No data |
| VPI - New England School for Girls | VT | 30 | 30 | 0 | 0 | 6 | No data |
| VPI - Vermont School for Girls | VT | 6 | 5 | 0 | 1 | 1 | No data |
| No Data / Insufficient Information | ? | 6 | 5 | 0 | 1 | 2 | No data |
| | | 461 | 386 | 67 | 8 | | |

Table 2. Restraints and Seclusions of Children Under Age Ten, 2025

| Child/Youth | R/S Total | Restraints | Seclusions | Avg. Age at Incidents | Restraint Average Duration | Seclusion Average Duration | Number of Programs | Gender |
|-------------|------------|------------|------------|-----------------------|----------------------------|----------------------------|--------------------|-----------------|
| Child 1 | 44 | 21 | 23 | 7 | 4 | 17 | 1 | M |
| Child 2 | 39 | 26 | 13 | 8 | 6 | 11 | 1 | F |
| Child 3 | 26 | 17 | 9 | 9 | 15 | No Data | 2 | M |
| Child 4 | 23 | 23 | 0 | 7 | 8 | No Data | 1 | F |
| Child 5 | 2 | 1 | 1 | 6 | 1 | 2 | 1 | M |
| Child 6 | 1 | 0 | 1 | 9 | No Data | 10 | 1 | F |
| | 135 | 88 | 47 | 8 | 6.8 | 10 | 1 | 3 M, 3 F |

Table 3. Unique Children and Youth in Restraints and Seclusions, 2025

| Child/Youth | R/S Total | Restraints | Seclusions | Avg. Age at Incidents | Restraint Average Duration | Seclusion Average Duration | Number of Programs | Gender |
|-------------|-----------|------------|------------|-----------------------|----------------------------|----------------------------|--------------------|---------|
| Child 1 | 44 | 21 | 23 | 7 | 4 | 17 | 1 | M |
| Child 2 | 40 | 32 | 8 | 11 | 11 | No Data | 2 | F |
| Child 3 | 39 | 26 | 13 | 8 | 6 | 11 | 1 | F |
| Child 4 | 34 | 34 | 0 | 13 | 9 | No Data | 2 | F |
| Child 5 | 26 | 17 | 9 | 9 | 15 | No Data | 2 | M |
| Child 6 | 23 | 23 | 0 | 7 | 8 | No Data | 1 | F |
| Child 7 | 21 | 12 | 9 | 10 | 2 | No Data | 2 | M |
| Child 8 | 21 | 21 | 0 | 13 | 32 | No Data | 2 | F |
| No Data | 20 | 19 | 0 | 0 | 17 | No Data | 3 | No Data |
| Child 9 | 18 | 18 | 0 | 16 | 23 | No Data | 1 | M |
| Child 10 | 17 | 17 | 0 | 12 | 35 | No Data | 2 | M |

CONTINUED NEXT PAGE

Table 3 continued - Unique Children and Youth in Restraints/Seclusions, 2025

| Child/Youth | R/S Total | Restraints | Seclusions | Avg. Age at Incidents | Restraint Average Duration | Seclusion Average Duration | Number of Programs | Gender |
|-------------|-----------|------------|------------|-----------------------|----------------------------|----------------------------|--------------------|--------|
| Child 11 | 14 | 14 | 0 | 13 | 29 | No Data | 1 | F |
| Child 12 | 13 | 11 | 0 | 12 | 10 | No Data | 4 | M |
| Child 13 | 10 | 7 | 0 | 16 | 14 | No Data | 1 | F |
| Child 14 | 7 | 7 | 0 | 13 | 14 | No Data | 1 | M |
| Child 15 | 7 | 7 | 0 | 14 | 120 | No Data | 2 | M |
| Child 16 | 6 | 6 | 0 | 15 | No Data | No Data | 1 | F |
| Child 17 | 5 | 3 | 2 | 10 | No Data | No Data | 1 | M |
| Child 18 | 5 | 5 | 0 | 13 | 7 | No Data | 1 | F |
| Child 19 | 5 | 5 | 0 | 15 | 19 | No Data | 1 | M |
| Child 20 | 5 | 5 | 0 | 15 | 10 | No Data | 1 | M |
| Child 21 | 5 | 4 | 1 | 16 | 71 | 690 | 1 | M |
| Child 22 | 5 | 5 | 0 | 16 | 4 | No Data | 1 | M |
| Child 23 | 4 | 4 | 0 | 12 | 5 | No Data | 1 | M |
| Child 24 | 4 | 4 | 0 | 13 | No Data | No Data | 1 | F |
| Child 25 | 4 | 4 | 0 | 13 | 25 | No Data | 1 | M |
| Child 26 | 4 | 4 | 0 | 14 | 11 | No Data | 1 | M |
| Child 27 | 3 | 3 | 0 | 13 | 120 | No Data | 2 | M |
| Child 28 | 3 | 3 | 0 | 14 | 13 | No Data | 1 | F |
| Child 29 | 3 | 3 | 0 | 14 | 9 | No Data | 1 | F |
| Child 30 | 3 | 3 | 0 | 16 | No Data | No Data | 2 | F |
| Child 31 | 3 | 3 | 0 | 16 | No Data | No Data | 1 | M |
| Child 32 | 3 | 3 | 0 | 16 | 12 | No Data | 1 | F |
| Child 33 | 3 | 3 | 0 | 17 | No Data | No Data | 1 | M |
| Child 34 | 2 | 1 | 1 | 6 | 1 | 2 | 1 | M |

Table 3 continued - Unique Children and Youth in Restraints/Seclusions, 2025

CONDITIONS OF PLACEMENT: RESTRAINTS AND SECLUSIONS OF CHILDREN AND YOUTH

| Child/Youth | R/S Total | Restraints | Seclusions | Avg. Age at Incidents | Restraint Average Duration | Seclusion Average Duration | # Programs Exp R/S | Gender |
|-------------|------------|------------|------------|-----------------------|----------------------------|----------------------------|--------------------|--------|
| Child 35 | 2 | 2 | 0 | 13 | 13 | No Data | 1 | F |
| Child 36 | 2 | 2 | 0 | 14 | 143 | No Data | 1 | M |
| Child 37 | 2 | 2 | 0 | 14 | No Data | No Data | 1 | M |
| Child 38 | 2 | 2 | 0 | 14 | 4 | No Data | 1 | M |
| Child 39 | 2 | 2 | 0 | 15 | 12 | No Data | 1 | F |
| Child 40 | 2 | 2 | 0 | 17 | 13 | No Data | 1 | F |
| Child 41 | 2 | 2 | 0 | 17 | 37 | No Data | 1 | F |
| Child 42 | 2 | 2 | 0 | 17 | 7 | No Data | 1 | M |
| Child 43 | 2 | 2 | 0 | 17 | 10 | No Data | 1 | F |
| Child 44 | 1 | 1 | 0 | 16 | 13 | No Data | 1 | F |
| Child 45 | 1 | 0 | 1 | 9 | No Data | 10 | 1 | F |
| Child 46 | 1 | 0 | 0 | 13 | No Data | No Data | 1 | M |
| Child 47 | 1 | 1 | 0 | 14 | 2 | No Data | 1 | M |
| Child 48 | 1 | 1 | 0 | 14 | No Data | No Data | 1 | F |
| Child 49 | 1 | 1 | 0 | 15 | 2 | No Data | 1 | M |
| Child 50 | 1 | 1 | 0 | 16 | 42 | No Data | 1 | M |
| Child 51 | 1 | 0 | 0 | 16 | No Data | No Data | 1 | F |
| Child 52 | 1 | 1 | 0 | 16 | No Data | No Data | 1 | F |
| Child 53 | 1 | 1 | 0 | 16 | 1 | No Data | 1 | M |
| Child 54 | 1 | 1 | 0 | 17 | 20 | No Data | 1 | F |
| Child 55 | 1 | 1 | 0 | 17 | 60 | No Data | 1 | M |
| Child 56 | 1 | 1 | 0 | 17 | No Data | No Data | 1 | F |
| Child 57 | 1 | 1 | 0 | 17 | 27 | No Data | 1 | M |
| | 461 | 386 | 67 | | | | | |

OCYFA RECOMMENDATIONS

The Vermont legislature should ban the use of dangerous and harmful restraint and seclusion practices on children and youth, such as prone restraints, chemical restraints, and strip searches

The Vermont legislature should require reporting within 24 hours of all incidents of restraint or seclusion of children in DCF custody to DCF, parents/guardians, the OCYFA, all attorneys, the GAL, and the educational decision maker

The Vermont legislature should require standardized reporting categories for all restraints and seclusions, including date and time of incident, type of incident (restraint or seclusion), type of restraint (physical, mechanical, chemical), child name and date of birth, facility name, duration, and detailed description

The Vermont legislature should require that reports of restraints and seclusions be sent via direct digital transmission to DCF and OCYFA in an accessible table format, such as .csv or .xlsx

The Vermont legislature should require DCF to create a public dashboard, updated monthly, to include aggregate restraint and seclusion data for all programs, in state and out, serving Vermont children and youth

The Vermont legislature should inquire into the incorporation of child safety reporting mechanisms into the planned CCWIS data system, including those tracking restraint and seclusion, missing youth, and injured youth

All stakeholders should focus on supportive practices for children and youth that reduce or eliminate the need for restraint and seclusion, leveraging the expertise of current Vermont providers who use zero or few restraints

The Vermont legislature should explore independent oversight and due process mechanisms for children and families related to restraint and seclusion, including enhanced notice of rights requirements to children and youth, and requirements for independent reviews of program quality if a child is frequently restrained or secluded

CONDITIONS OF PLACEMENT: INJURIES TO CHILDREN AND YOUTH IN DCF CUSTODY

“The Department shall notify the Office of: (1) all incidents of actual physical injury to children or youths in the custody of the Commissioner or at significant risk of such harm...”
 - 33 VSA § 3206

- DCF workers document injuries to children in state custody in individual case files and DCF forwards injury reports to the OCYFA via email on an ad hoc basis. **DCF does not track comprehensive or longitudinal injury data** and has not required its new CCWIS data system to have the ability to do so.
- **In 2025, DCF reported 47 individual instances of injury to children or youth in its custody** to the OCYFA, compared to 24 in 2024 and 30 in 2023.
- These 47 instances involved 38 unique children and youth. The average age for injuries was 12.5 years old. Injuries varied from relatively minor, like suspected broken bones, to serious medical episodes requiring hospital stays, and one fatality.
- One youth was injured six times, four were injured twice, and the remainder were injured once. As documented in the previous section, **some injuries occurred during restraints**.
- In 2025, the OCYFA improved the quality, reliability, and scope of its data analysis of injuries to children in DCF custody. We now have the ability to track longitudinal data on individual children, as well as aggregate categorical data.
- **Evidence of self-harm was the highest injury category in 2025, as it was for 2024.** The average age for children in self-harm incidents was 15.8.

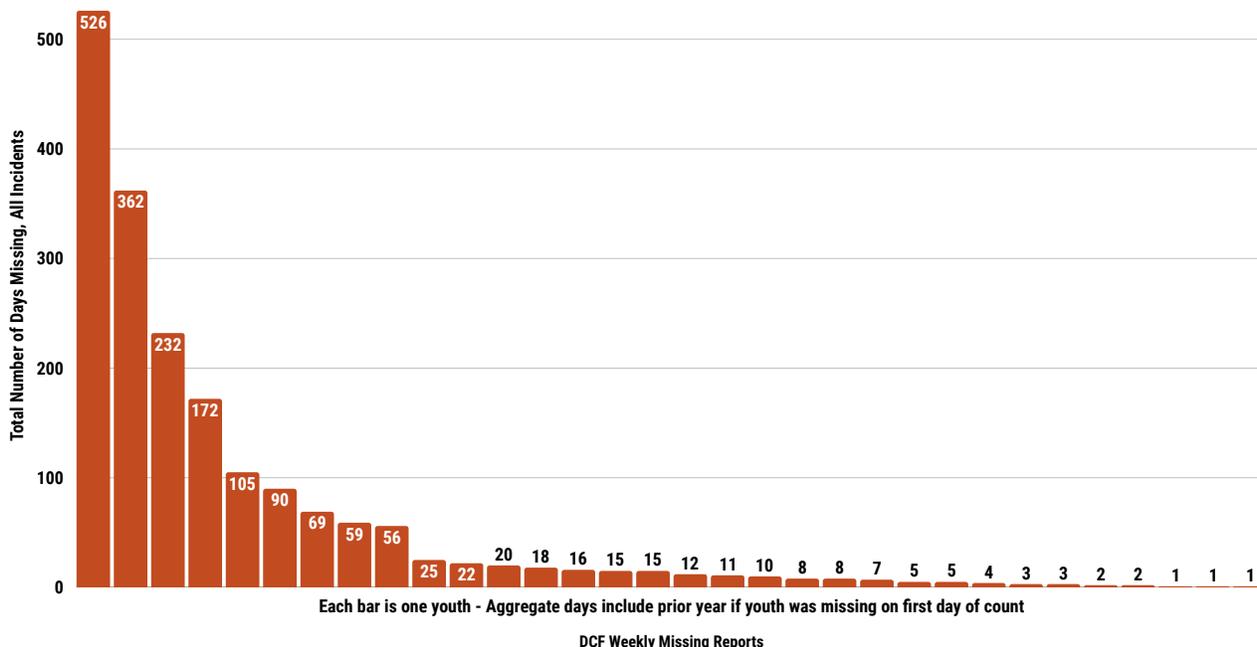
| Injury Category | Count | % of Total | Avg. Age |
|---|-------|------------|-------------|
| Evidence of Self-Harm | 16 | 35% | 15.8 |
| Evidence of Accidental Physical Injury | 15 | 33% | 11.3 |
| Evidence of Non-Accidental Injury | 8 | 17% | 10.6 |
| Elopement | 5 | 11% | 15.6 |
| Serious Physical Injury Suspected / DCF Policy 68 | 4 | 9% | 4.7 |
| Medical Episode | 4 | 9% | 14.9 |
| Youth on Youth Aggression | 3 | 7% | 16.3 |
| Evidence of Lack of Supervision | 3 | 7% | 6 |
| Evidence of Sexual Abuse | 1 | 2% | 17 |
| | | | 12.5 |

CONDITIONS OF PLACEMENT: CHILDREN AND YOUTH MISSING FROM DCF CUSTODY

“The Department shall notify the Office of: (1) all incidents of actual physical injury to children or youths in the custody of the Commissioner *or at significant risk of such harm...*”
 - 33 VSA § 3206

- DCF reports children missing from its custody through a weekly email to internal stakeholders. The email contains a word processing document that reports which youth are missing that week and which have been found. **This system makes it challenging to track missing youth.**
- In 2025, DCF reported 32 individual youth as missing across 54 total incidents.
- Of the 32 youth reported missing at any point in the year, 19 were female (59%) and 13 were male (41%).
- The aggregate average age on the day the youth went missing was 15 years old.
- **At least 22% of youth who went missing were Black, Indigenous, or Persons of Color.**
- Ten youth had more than one missing incident, accounting for 32 total missing incidents with an average time missing of 153 days. **One youth who went missing in 2025 has spent 526 days missing from DCF custody across several incidents, dating back to late 2023.**
- Most of these youth elope from residential programs.
- In 2025, the OCYFA improved the quality, reliability, and scope of its data analysis of children missing from DCF custody. We now have the ability to track longitudinal data on individual children, as well as aggregate categorical data.
- **The cohort of youth who go missing from DCF custody present multiple safety concerns, including an elevated risk of trafficking.**

Youth on Missing Lists in 2025
 10/1/24 through 9/30/25

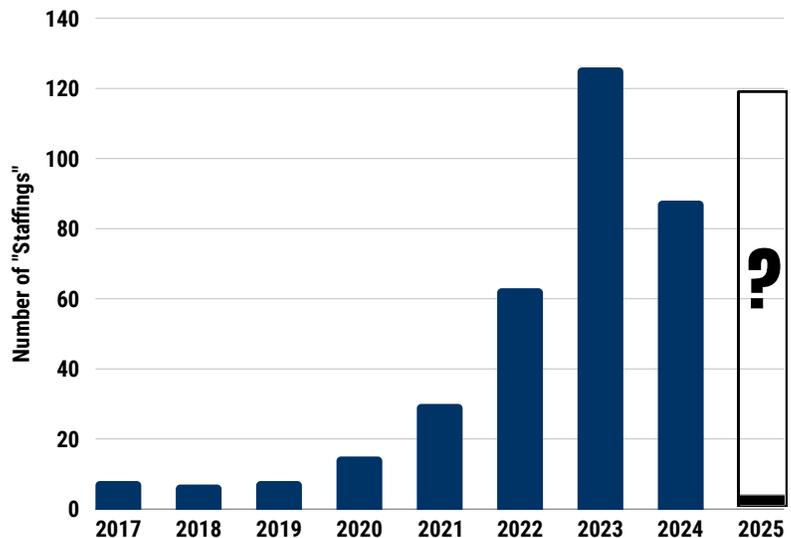


CONDITIONS OF PLACEMENT: “STAFFINGS”

“The Department shall notify the Office of: (1) all incidents of actual physical injury to children or youths in the custody of the Commissioner or at significant risk of such harm...”
- 33 VSA § 3206

- A “staffing” is an unlicensed, unregulated place where children are isolated. A “staffing” occurs when DCF deems a child or youth unsafe to themselves or others, or when DCF can find no other placement for them. The child is then held at a hotel, sheriff’s office, or other location, with no access to education, treatment, peer interactions, or community engagement. State employees and contractors expend considerable efforts to accompany the young person around the clock. **Youth in these settings are disproportionately developmentally or intellectually disabled.**
- DCF began developing these settings following the closure of Woodside, in a time when Vermont had sufficient residential capacity. “Staffing” settings exist because **Vermont has not built sufficient programming that is responsive to the needs of children and families.**
- DCF did not respond to several requests for “staffing” data in 2025. The OCYFA used its access to DCF systems to analyze four unlicensed settings: Bennington County Horizon Apartment, Lamoille County Yellow House, The Rest Stop, and Chelsea House.
- The OCYFA found 40 total “staffing” episodes at these programs that included 23 unique children and adolescents. Of these, the shortest lasted less than one day and the longest lasted 27 days. One adolescent experienced seven “staffings” for a total of 53 days. Another experienced three “staffings” for a total 48 days. **The average “staffing” duration was 13 days.**
- Between 2022 and 2024, DCF spent over \$2.5 million on “staffing” settings. It is unclear how much these settings cost in 2025.

DCF Total “Staffings” of Youth & Children



OCYFA RECOMMENDATIONS

DCF should publish public data on “staffings,” including the cost of such placements and the treatment needs of the children involved

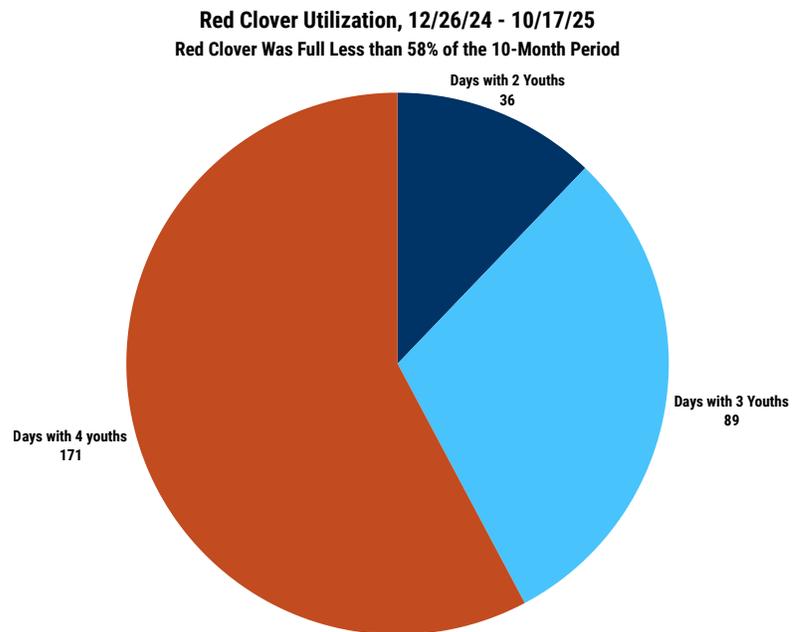
DCF should create a system of direct digital reporting of “staffings” to OCYFA prior to the creation of its new CCWIS data system

DCF should create and publish a data-driven plan to end all “staffings” of children by 2027

CONDITIONS OF PLACEMENT: LOCKED FACILITIES

“The Department shall notify the Office of: (1) all incidents of actual physical injury to children or youths in the custody of the Commissioner or at significant risk of such harm...”
- 33 VSA § 3206

- **Children placed in locked detention facilities represent failures of preventive policy to respond to the needs of families at the community level.** Nationwide, about 60% of children in the juvenile justice system have a history in the child protection system and 90% have experienced trauma. Nearly all children in locked facilities have IEPs. **Vermont has not matched its efforts to build deep end facilities and programs with a vision or plan to develop *supportive services* related to youth justice.**
- Locked facilities for children and youth are some of the most expensive, inefficient, and racially inequitable investments a state can make in children. While DCF uses “treatment” language to discuss its locked facilities, there is no evidence that youth improve in these settings. **They are fundamentally places of detention.**
- **The State of Vermont has presented no quantitative data to back the 15-bed capacity of its proposed new locked youth detention facility, Green Mountain Youth Campus.**
- The data we *do* have suggests that 15 beds may be far too many. **The current, four-bed Red Clover facility was full less than 58% of the time in 2025, accounting for program ramp up and licensure.**
- Given that Vermont may pay more than \$2 million per bed per year for its future locked facility ([see page 14](#)), right-sizing is crucial.
- The Council on Equitable Youth Justice has hired a consultant from [NCJJ](#) to evaluate the “development, operation, and programming” of Vermont’s youth justice system. **It is unclear if NCJJ’s recommendations will have any effect on DCF’s plans for its youth justice system.**
- Vermont routinely places children in adult detention facilities, such as Marble Valley Regional Correctional Facility in Rutland.
- **One youth interviewed by OCYFA staff spent 19 days at Marble Valley, in what was essentially solitary confinement, 10 to 16 hours a day.** DCF does not track data on how often youth are placed in adult facilities, or their length of stay. According to a media story, there were 26 youth held in Vermont prisons in federal fiscal year 2025, up from 20 the previous year and 13 the year before that.
- **State policy that responds to the detention of children in locked facilities by calling for the construction of more locked facilities has already failed in Vermont.** Without increased investments in evidence-based responses to families that prevent deep end involvement, general fund spending will continue to soar, community safety will worsen, and youth outcomes will suffer.



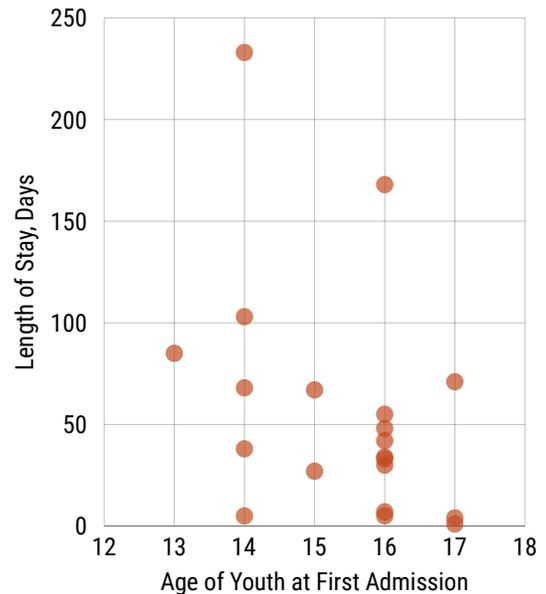
CONDITIONS OF PLACEMENT: LOCKED FACILITIES

Red Clover Admissions, October 2024 to October 2025

| Youth | Age at Initial Admission | Gender | Stays | Aggregate Length of Stay, Days | State of Origin |
|----------|--------------------------|--------|-------|--------------------------------|-----------------|
| Youth 1 | 14 | M | 2 | 233 | VT |
| Youth 2 | 16 | M | 1 | 168 | VT |
| Youth 3 | 14 | M | 1 | 103 | VT |
| Youth 4 | 13 | M | 1 | 85 | VT |
| Youth 5 | 17 | M | 1 | 71 | VT |
| Youth 6 | 14 | M | 2 | 68 | VT |
| Youth 7 | 15 | M | 2 | 67 | VT |
| Youth 8 | 16 | M | 1 | 55 | MA |
| Youth 9 | 16 | M | 1 | 48 | MA |
| Youth 10 | 16 | M | 1 | 42 | MA |
| Youth 11 | 14 | M | 1 | 38 | VT |
| Youth 12 | 16 | M | 2 | 34 | VT |
| Youth 13 | 16 | M | 1 | 33 | VT |
| Youth 14 | 16 | M | 3 | 30 | VT |
| Youth 15 | 15 | M | 1 | 27 | VT |
| Youth 16 | 16 | M | 1 | 7 | VT |
| Youth 17 | 16 | F | 1 | 5 | VT |
| Youth 18 | 14 | M | 1 | 5 | VT |
| Youth 19 | 17 | M | 1 | 4 | VT |
| Youth 20 | 17 | M | 1 | 1 | MA |

- Red Clover Treatment Center is Vermont’s new, “temporary,” four-bed detention facility. It accepted its first youth on October 22, 2024.
- Between October 22, 2024, and October 21, 2025, twenty individual youth were placed at Red Clover, some for more than one stay. Of these youth, one had three stays, four had two stays, and fifteen had one stay. The aggregate length of stay per youth ranged from one day to 233 days, with an average length of stay of 56 days. The average age at first admission was 15.8. Almost all youth sent to Red Clover in 2025 were male-identifying (19/20). Four of the 20 youth were from Massachusetts. The racial demographics of this cohort are unclear.

Red Clover, 2025



OCYFA RECOMMENDATIONS

The State of Vermont should pause its plans to build a new locked youth facility until we have clear data on need and cost, including the pending NCJJ report

DCF should publish aggregate data on youth placed in locked facilities, including cost, treatment needs, and incidence of child welfare dual involvement

CLOSING: PULLING IT ALL TOGETHER

As this report demonstrates, a data-backed, goal-oriented vision for Vermont’s child welfare and youth justice systems is possible *now*. DCF and its partners, including OCYFA, can begin improving data collection and transparency immediately, using existing systems. Reenvisioning DCF’s data practices, not just its data systems, is integral to this transformation.

We all know that state systems—indeed, any systems—can be difficult to change, especially in this current moment. Quarterly budgets, not decades-long investments, drive state policy. On an individual level, it feels like resources are becoming increasingly scarce across society. Administrative burdens weigh down our ideals. The day-to-day often takes precedence over our ambitions.

But in these overwhelming times, it is also important to take stock of our assets. Child welfare and youth justice remain perhaps the most bipartisan policy areas nationwide. Innovation in these fields may well be at an all-time high. Federal support for child welfare remains strong. We have the tools to build better systems.

The OCYFA looks forward to strengthening our partnerships in the coming year. Our plans for 2026 include improving public communications through our website and digital newsletter, strengthening connections to our Oversight Commission and Advisory Council, expanding fiscal analysis to support policymakers, improving our complaint processes and response time, and, as always, connecting with more young people. It is to them that we dedicate everything we do.

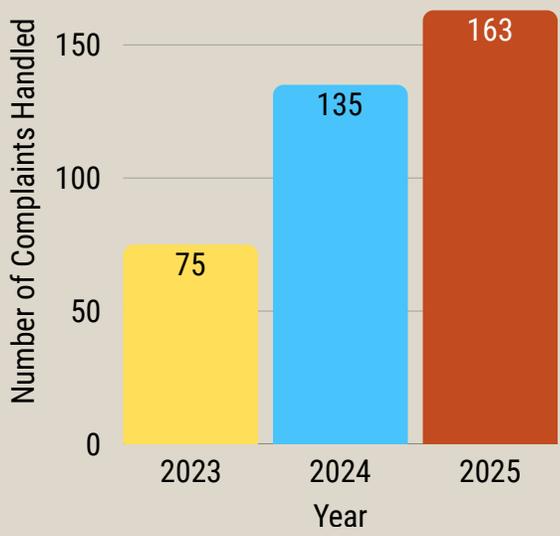


The view from our new office.

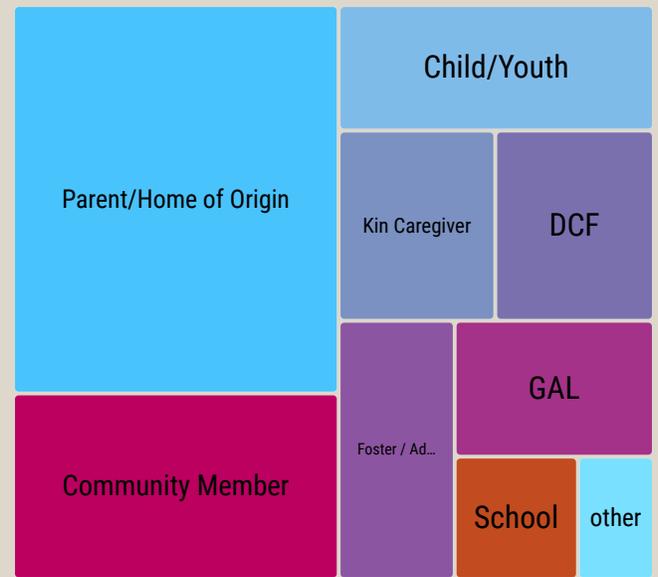
OCYFA Direct Assistance to Children and Families

“The Office shall review complaints concerning the actions of the Department and of any entity that provides services to children, youths, and families through funds provided by the Department; make appropriate referrals; and respond to those complaints where the Advocate determines that a child, youth, or family may be in need of assistance from the Office” — 33 VSA § 3203(3)

OCYFA Caseload



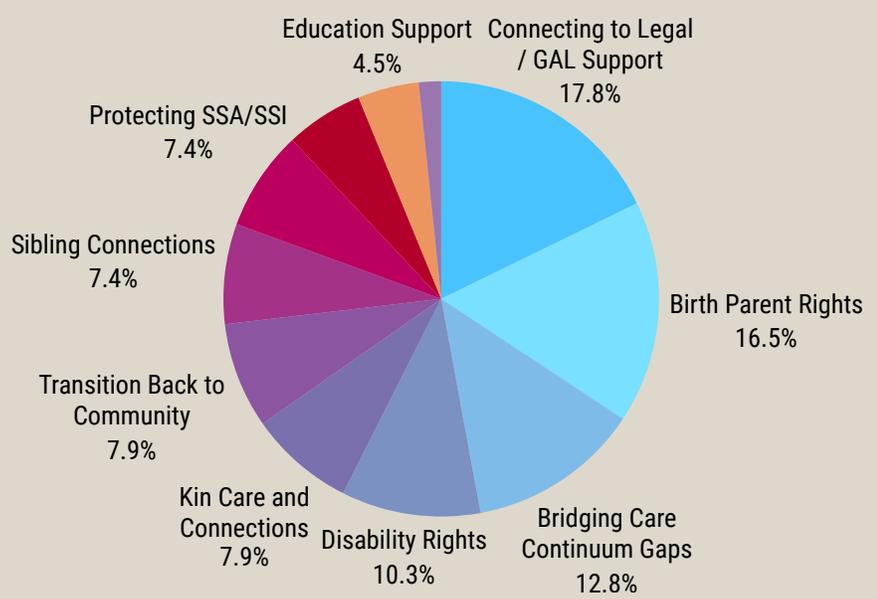
Who Requested Assistance?



What Were Callers' Concerns?



What Assistance Did OCYFA Provide?



OCYFA Impact Narratives

We are often asked what the OCYFA *actually* does. The excerpts below are summaries of some of our individual advocacy in 2025.

Supporting a Grandmother in Becoming a Kinship Foster Provider

A grandmother reached out requesting help getting connected to her local DCF office. Her grandchildren had recently come into foster care and were placed with another relative. The grandmother sought increased connection to the children and was thinking about becoming a licensed foster placement but wanted support in working with DCF. The OCYFA explained the process, validated her motivations, and connected her to the DCF Resource Coordinator to apply to be a respite provider and, eventually, a licensed kinship provider. The grandmother was successful in visiting her grandchildren and gained the confidence to pursue licensure.

Supporting Young People in their Transition to Adult Developmental Services

In 2025, the OCYFA worked with four transition-aged youth with disabilities as they turned 18, aged out of DCF custody, and went through the eligibility assessment process for adult developmental services. All four youth were eligible for social security benefits but needed support navigating administrative barriers. Two identified as transgender. All four were either already homeless or at serious risk of becoming homeless. The OCYFA worked as part of a team that included DCF to coordinate benefits, stabilize housing, bring providers and advocates together to clarify roles and objectives, and ensure that the voice of the young person drove the process.

Supporting Kin to Self-Advocate

A grandmother reached out requesting help with the expungement process for a substantiation from decades ago. She wished to care for her grandchild in DCF custody but was prevented from doing so because of the substantiation. She was eligible to apply for expungement but needed help understanding the process. The OCYFA walked her through the necessary steps, connected her to DCF's online resources, and helped her gather the required documentation. With this support, the grandmother was able to successfully expunge the substantiation on her own. Once she cleared this barrier, she returned to the OCYFA for new support with becoming her grandchild's caregiver.

Act 173 Advocacy

The OCYFA was instrumental in the passage of Act 173 of 2024, which, for the first time, allowed former foster youth to access their court and DCF records from their time in care. In 2025, the OCYFA directly supported four Act 173 requests by former foster youth. While each case was different, it became clear that Act 173 is not being implemented as former foster youth expected. Extended wait times due primarily to excessive redactions by DCF are the biggest problem, followed by barriers in accessing sealed records, problems with identity verification, unnecessarily threatening disclaimers, and other administrative hurdles. The OCYFA submitted feedback as part of DCF's recent report on Act 173 implementation and will continue to work collaboratively to improve access to records in 2026.

Spotlight: Young People Speak About their Experience in Foster Care

At the Youth Empowerment Summit at Vermont State University on April 10, 2025, the OCYFA asked young people for feedback on their time in custody. Below are excerpts of their answers

WHAT IS DCF DOING WELL?

- BEING OPEN TO IDEAS FROM YOUTH
- NOTHING AT ALL
- ALWAYS LISTENS
- THEY HELP WITH CHILD SERVICES
- TRY
- PUT ME WITH MY GRANDPARENTS
- CONNECTION TO THE YOUTH DEVELOPMENT PROGRAM

What rights should you have?

- The right to see my family
- Personal expression—hair styles and tattoos at 16!
- Experienced psychiatric nurse to call when things are tough
- Disability rights
- The right to leave programs – consent at 14
- The right to contact my family.

What Can DCF Do Better?

- Provide documents, daily check in with case managers, communicate changes in schedule
- Show Up! Help
- DCF workers need more parenting skills for youth
- “See us more.” We’re not just another person
- They fabricate stories. They tell me and my parents different things.
- Give more resources to find my way
- Actually visit us
- Screen foster parents more, don’t just give them classes
- Make sure kids see their families if they want to
- More supports when we get to 18, it feels like they wipe their hands of you
- Give me freedom
- Advocate for the children
- DCF waited too long to get involved after I had 1.5 years of abuse
- Listen to the children
- All the programs are the same
- Give me \$1 million
- They take their time. Don’t take 3 years to get me out of placement.

Sources and Citations for Pages 1-12

Note: The pdf and web versions of this report contain hyperlinks to all sources, when available.

Page 3:

- For an example of a child welfare agency reassessment plan, see Missouri Department of Social Services, [A Plan To Rebuild & Reform Children's Division](#),

Page 4:

- Third and sixth bullets: See Casey Family Programs, "[Upstream investment in children and families pays off](#)," September 8, 2020.
- Fourth bullet: See Child Trends, "[Child Welfare Agency Spending in Vermont in SFY 2022](#)," July 2025, and Child Trends (Kristina Rosinsky, Megan Fischer, Maggie Haas, Alyssa Ibarra, and Sarah Catherine Williams), "[Child Welfare Financing SFY 2022](#)."
- Fifth bullet: See Vermont DCF, "[Operational Costs of Residential Treatment for Youth Report](#)," March 2025, at 6.
- Last bullet: See Alex Adams, Letter to Vermont Governor Phil Scott, December 8, 2025, on file with OCYFA.

Page 5:

- Data this page from OCYFA analysis of DCF RTC Spreadsheet as of October 1, 2024, and October 1, 2025, and OCYFA analysis of 2025 data mandated by [33 VSA § 3206](#).
- Last bullet: See Natasha E. Latzman & Deborah A. Gibbs, [Examining the Link: Foster Care Runaway Episodes and Human Trafficking](#), October 2020.

Page 6:

- Second bullet: DCF "[Report on Long-Term Plan for Justice-Involved Youth](#)," November 1, 2020, at 4 ("...establishing the Horizon Apartment, and effective November 1, 2020, converting 4 of these beds into beds for youth who otherwise would have gone to Woodside").
- Fourth bullet: See [OCYFA 2024 Annual Report](#), at 19-20.

Page 9:

- Seventh bullet: Youth justice principles derived from [33 VSA § 5101a\(a\)](#).

Page 10:

- First bullet: See Mercedes de Guardiola, [Vermont for the Vermonters](#), Vermont Historical Society, 2023.
- Second bullet: See, e.g., [Vermont SDM Danger Indicators](#).

Page 11:

- First bullet: See the recently released landmark study, Frank Edwards, Kelley Fong, Robert Apel, "[Foster Care and Child Maltreatment Mortality Rates in the US](#)," JAMA, 2025, finding no evidence that increased foster care entries result in fewer child maltreatment fatalities.
- Third bullet: See Child Welfare Wonk, "[Mapping the Foster Care Decline](#)," Substack, 12/15/25, noting that reductions in children coming into foster care nationwide have affected demographic groups inequitably, with more Black and Native American children remaining in foster care than white children. "Among foster care entries, in 2024 compared with 2018 there were: 40 percent fewer White children; 34 percent fewer Hispanic children; 34 percent fewer Asian children; 30 percent fewer Black children; 26 percent fewer American Indian or Alaska Native children." Data for chart comparing Vermont foster care rate to other states from Annie E. Casey Foundation, "[Children Ages Birth to 17 in Foster Care in United States](#)," and "[Children Ages Birth to 17 in Foster Care in Vermont](#)."
- Fourth bullet, fifth bullet, and chart: See "[DHW aims to increase foster homes in Idaho](#)" and "[ACF Unveils New Initiative to Strengthen American Families – A Home For Every Child](#)," November 24, 2025. ACF has signaled that this ratio will be a measure of states' progress. Chart data from [DCF annual child protection reports](#) and [2024 OCYFA Annual Report](#), at 13.

Page 12:

- First bullet and entire page: See [OCYFA 2024 Annual Report](#), at 11-12, Claire Kimberly, "[Promoting Stability in Kinship Foster Homes](#)," September 2023, AECF, "[Family Ties: Analysis From A State-By-State Survey Of Kinship Care Policies](#)," 2024, Think of Us, "[Kin, First and Foremost](#)," October 2024.
- Second bullet: Claire Kimberly, "[Promoting Stability in Kinship Foster Homes](#)," September 2023, at 4.

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Sources and Citations for Pages 12-13

Page 12 cont'd:

- Third bullet: Imprint Podcast, [“Trump’s Top Child Welfare Official: An Interview with Alex Adams,”](#) December 14, 2025.
- Sixth bullet: See [GSK Network FAQs](#) and [map](#).
- For new kin rule, see ACF, [“Separate Licensing or Approval Standards for Relative or Kinship Foster Family Homes,”](#) Final Rule, September 28, 2023, 45 CFR Part 1355 and 1356: “Title IV-E agencies may choose to claim title IV-E federal financial participation (FFP) for the cost of foster care maintenance payments (FCMP) on behalf of an otherwise eligible child who is placed in a relative or kinship licensed or approved foster family home when the agency uses different licensing or approval standards for relative or kinship foster family homes and non-relative/non-kinship foster family homes. In addition, the final rule requires title IV-E agencies to periodically review the amount of FCMPs to also ensure that the agency provides a licensed or approved relative or kinship foster family home the same amount of FCMP that would have been made if the child was placed in a non-related/non-kinship foster family home.” See also ABA et al., [“Kin-Specific Licensing Progress and Documents,”](#) 2024.

Page 13:

- This page, chart, and spending data from Vermont responses to Child Trends survey, on file with OCYFA and see Child Trends, [“Child Welfare Agency Spending in Vermont in SFY 2022,”](#) July 2025, especially at 98-99, and Child Trends (Kristina Rosinsky, Megan Fischer, Maggie Haas, Alyssa Ibarra, and Sarah Catherine Williams), [“Child Welfare Financing SFY 2022.”](#) Report is from 2025 drawing on SFY 2022 data. Dollar values likely higher for SFY 2025 and 2026. “State budget” includes local budgets. 43 states reported. “Most states, including Vermont, were able to provide only approximations for how their funds were spent,” [Vermont Report](#) at 5. In the Child Trends survey, “child protective services” includes “services/activities that are administered by the child welfare agency for children/young adults (including youth who are ages 18 and older) and families for: Intake/screening, family assessment, investigation, services provided during the investigation/assessment, case management during the investigation/assessment, all other associated administrative costs.” See Child Trends survey, Vermont response, on file at OCYFA. Vermont’s limited spending on child protective services contrasts sharply with Vermont’s consistent status as #1 in the nation for reports to its child protection hotline—see [2024 OCYFA Annual Report](#), at 7.
- In response to a draft of this report, DCF officials made several helpful comments, noting especially that it has not been longstanding practice in Vermont to break out spending into the categories on page 13 of this report, i.e. prevention, child protective services, out-of-home placements, adoption and guardianship, and older youth, but that “we could create shared understanding of what goes into each bucket and then create manual reports of those expenditures.” The OCYFA strongly supports this recommendation and further recommends that DCF plan to configure its data systems to do this work automatically, rather than manually. DCF also expressed confusion about who this information could or should be presented to. The OCYFA response is: to the public, the legislature, communities, and to DCF itself. Understanding Vermont’s investments in children and families by category seems critical and useful to all stakeholders.
- Fourth bullet: In response to a draft of this report, DCF wrote that it has been successful in reducing Vermont’s use of congregate care, from over 200 children in these settings a decade ago to about 80 today. The OCYFA agrees that this has been important work and looks forward to partnering with DCF to further decrease Vermont’s still-too-high rate. DCF and the OCYFA agree that, in the area of residential care, we should focus on supporting children with developmental and intellectual disabilities, young children, and reducing length of stay of all children and youth.
- Fifth bullet: In response to a draft of this report, DCF wrote that its role in handling youth justice, not merely child welfare, impacts out of home placement spending statistics. The OCYFA responds that Vermont DCF’s role handling youth justice also brings an equal or greater obligation to create, support, and grow prevention *specifically related to youth justice*. DCF has an obligation to support families upstream in youth justice just as it does in child welfare. With a plan and dedicated leadership, we believe DCF can achieve parallel successes in youth justice to those we outline in child welfare on [pages 10 and 11 above](#). DCF also asked for specific suggestions for supportive services, particularly in the field of youth justice. A useful compilation of such services can be found at Council for State Governments, [“Youth Safety Playbook for States.”](#)

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Sources and Citations for Pages 13-15

Page 13 cont'd:

- Fifth bullet: In response to a draft version of this report, DCF cited several existing prevention-focused contracts and service pathways that were not fully reflected in the report's discussion of Vermont's upstream service array, including DCF's Compass Program, Balanced and Restorative Justice (BARJ) program, and Intensive Family-Based Services (IFBS) program. The OCYFA appreciates this list and would like to see a full presentation or handout expanding this concept, including the full list of this type of service, what year each service was developed, state and federal investment in each service over time, and future plans or goals to expand or further develop Vermont's youth justice upstream service array. The OCYFA believes that such a tabulation would affirm our conclusions in this report—that Vermont's upstream investments do not come close to matching its deep end investments, despite the known efficiency of the former over the latter. Because they support families, allow for federal drawdowns, and return more on investment than deep end programs, Vermont should spend at least 1.5x on upstream compared to deep end. This is an example of a goal that DCF should clearly detail and track.

Page 14:

- Chart at top based on OCYFA analysis of DCF CB-496 reports, on file at OCYFA.
- In response to a draft version of this report, DCF asserted that the primary reason it cannot draw down federal money for congregate care is the fingerprint-supported background check requirement that was part of FFPSA.
- First bullet: For estimate of cost of GMYC, see [2024 OCYFA Annual Report](#), at 19. For WRH cost, see West River Haven contract, on file at OCYFA. For Red Clover cost, see Vermont DCF, "[Operational Costs of Residential Treatment for Youth Report](#)," January 15, 2025, at 6.

Page 15:

- First bullet: Quote from Vermont DCF, [Operational Costs of Residential Treatment for Youth Report](#), March 2025, at 7. For Woodside, see Joe Sexton, [The Loss of Grace: An Investigation of Woodside Juvenile Rehabilitation Center | Seven Days](#), October 25, 2023. The claim that the new facility will be unlike Woodside centers on the decision to hire a contractor to run the new facility rather than DCF running it themselves. "It is inherently more costly to contract with a third party for residential placement...but it allows for greater resident protections because an entity is no longer in the conflicted role of licensing and providing oversight of itself." [Operational Costs of Residential Treatment for Youth Report](#) at 8. But DCF's GMYC plan in fact does almost nothing to remedy the conflicts of interest that led to the systemic abuse at Woodside. While DCF will not "run" the new facility, it will still hold multiple conflicting roles, including licensing and regulatory authority, needs assessor (pre-disposition), placement authority (post-disposition), abuse allegations investigator, and legal parent. The new facility will operate under the same [Residential Treatment Program Regulations](#) as Woodside, which still exempt locked facilities from prohibitions on intensive physical coercion of children of all ages and genders, and allow the use of mechanical restraints and strip searches. These regulations require that staff train in "Trauma informed use of mechanical restraint" and "Trauma informed execution of strip search." [Licensing Regulations for Residential Treatment Programs in Vermont](#), at 42-43. The new facility will operate under the same eight-day hearing procedures that governed Woodside at its closure and will still be accredited by the same entity that accredited Woodside and that accredits many other facilities, including some where abuse has occurred. The new facility will apparently hold both pre- and post-disposition youth.
- In response to a draft version of this report, DCF noted they are not required to report data on congregate care and locked facilities. The OCYFA responds: 1. Perhaps DCF *should be* required to report this data, 2. Even if the data is not required, doesn't DCF have an interest in compiling it? Doesn't the State of Vermont want to build the smallest facility necessary, especially given its own budgetary pressures? Shouldn't the proposed facility's size and treatment needs be data-informed, not merely based on narrative reports as they currently are? 3. Shouldn't the extreme expense of locked facilities make the State of Vermont rethink what "expensive" means in the context of preventive and upstream services? Shouldn't the same willingness to spend general fund dollars on deep end systems apply to the new DCF data system and the construction of new prevention services, which will yield a much better return on investment?

Sources and Citations for Pages 16-21

Page 17:

- This page: See Alex Adams, Letter to Vermont Governor Phil Scott, December 8, 2025, on file with OCYFA. Actual DCF survivor's benefit estimate amount is \$488,093.24. This amount reflects the total cost of care for the 54 children for which DCF uses the benefits. Aggregate annual benefit amount is higher. DCF's current practice is to conserve, for each individual child, any benefits beyond the cost of the child's care. According to DCF, the total estimate, including benefits related to the child's own disability, is about \$812,000 per year.
- In comments to a draft of this report, DCF pointed out that not all young people benefit from being their own payee, and that there are logistical challenges in conserving and protecting this money and preventing exploitation. The OCYFA completely agrees and has been working with the Vermont Treasurer, Vermont Legal Aid, and children and youth themselves to inform this work.
- For a template executive order that could be used to end this practice, see Center for the American Child & America First Governors' Council, "[Model Executive Order: Protecting Federal Benefits for Foster Children.](#)"

Page 18:

- For JCAMP generally, see, e.g., [JCAMP Quick Start Guide](#). Additional partners and advisors on the JCAMP project included the ABA Center on Children and the Law, the National Association of Counsel for Children, the Preventive Legal Advocacy & Pre-Petition National Cohort, facilitated by the Barton Child Law and Policy Center at the Emory University School of Law, the Vermont Parent Representation Center, the Vermont Office of the Defender General, and the Vermont Judiciary.

Page 19:

- Second bullet: Alison Novak, [Sentinel Group Founder Runs Other Youth Centers Facing Claims | Seven Days](#), April 9, 2025; Peter D'Auria, [Vermont youths placed at Florida facilities where violent incidents occurred - VTDigger](#), September 30, 2024; Alan J. Keays, "[State to pay \\$4.5M to settle lawsuit over 'conscience-shocking' use of force at Woodside juvenile facility,](#)" VTDigger, February 15, 2023; Joe Sexton, [The Loss of Grace: An Investigation of Woodside Juvenile Rehabilitation Center | Seven Days](#), October 25, 2023. In 2024, a former foster youth [told Vermont lawmakers](#) that he was "exposed to overwhelming violence" in congregate facilities.
- Third bullet: See United States Senate Committee on Finance, "[Warehouses of Neglect: How Taxpayers are Funding Systemic Abuse in Youth Residential Facilities,](#)" 2024, "[Carter, Merkley, Cornyn, Tuberville, and Khanna Joined by Paris Hilton in Celebrating the Stop Institutional Child Abuse Act Passing the House, Heads to President's Desk,](#)" December 18, 2024, [Stop Institutional Child Abuse Act, 2024.](#)
- Fourth bullet: OCYFA analysis of DCF RTC Spreadsheet as of October 1, 2025, on file with OCYFA. Youth are included by their identified gender. Data obscured where necessary to protect identity of individual children and youth.

Page 20:

- First bullet and chart: OCYFA analysis of DCF RTC Spreadsheet as of October 1, 2025, and Restraint and Seclusion data analyzed and compiled by OCYFA, on file with OCYFA. Youth are included by their identified gender. Data obscured where necessary to protect identity of individual children and youth.

Page 21:

- Blue boxes at top, see [Licensing Regulations for Residential Treatment Programs in Vermont](#), effective January 2011, at 49.
- First bullet: See, e.g. Kelly et al., "[Trauma Informed Interventions to Reduce Seclusion, Restraint and Restrictive Practices Amongst Staff Caring for Children and Adolescents with Challenging Behaviours: A Systematic Review,](#)" March 15, 2023 and ABA (Amanda Robert), "[Children Should Be Protected From Unreasonable Restraints,](#)" August 3, 2020: "While students with disabilities comprise 12% of total enrollment, they comprise 71% of students who were restrained and 66% of students who were secluded, according to the data. African American students comprise 15% of total enrollment but represent 27% of those restrained and 23% of those secluded."
- Second bullet, see [33 VSA § 3206\(a\)\(2\)](#) and [Licensing Regulations for Residential Treatment Programs in Vermont](#), effective January 2011.

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Sources and Citations for Pages 21-30

Page 21:

- Third bullet estimate of hundreds of unreported restraints and seclusions comprised of:
 - An estimated 5-10 instances per month from the inpatient Brattleboro Retreat
 - An estimated 5-10 instances per month from schools not attached to residential programs
 - An estimated 3-5 incidents per month already in DCF case notes but not otherwise reported to OCYFA
 - An estimated 2-5 incidents per month from other sources (such as GALs and attorneys, children self-reports, and treatment teams)
- Third bullet “longstanding structural issues” include differing regulatory definitions and requirements depending on setting (e.g. education, residential care, hospital), challenges with obtaining reports from out of state providers, the lack of incentives for foster homes to self-report, insufficient systems to send reports from schools to DCF workers when children are in custody, and differing residential program procedures and forms.
- Fourth and seventh bullets: There appears to be general agreement between DCF and the OCYFA that a streamlined, direct, and standardized reporting system could be created in the coming year. The OCYFA looks forward to partnering with DCF and programs to create a system that ensures data fidelity while minimizing administrative burdens.
- Sixth bullet: In response to a draft of this report, DCF asserted that a restraint and seclusion reporting system could still be in the final CCWIS system even if it was not in the RFP. The OCYFA responds that we have seen no promise or commitment that it will be included. RFPs indicate state priorities and restraint and seclusion reporting systems should be high among them. The state’s choice to use a waterfall procurement method, and not the agile methodology recommended by the OCYFA, means that the RFP plays an outsized role in determining the final digital product.

Page 22:

- This page: OCYFA compilation and analysis of DCF and program data.
- Eighth bullet: The program permitted a DCF employee to view the video in question, but only on premises and would not permit DCF to have a copy. Given that DCF was both the legal guardian and contractor, the program should not be permitted to deny information critical to child safety. The program’s actions should elevate suspicion and trigger a DCF investigation.

Pages 23-26:

- Tables: Transgender youth are included by identified gender. Data obscured where necessary to protect identity of individual children and youth. Tables 2 and 3 sorted by total restraints and seclusions.

Page 27:

- For one model law, see Senator Shannon Grove, “[SB 1043 \(Grove\) Accountability In Children’s Treatment \(ACT\)](#),” 2024.

Page 28:

- Table: Working definition for reporting injuries is those requiring medical treatment, especially hospital level care. Aggregate total exceeds 100% because each injury may encompass multiple categories.
- Last bullet: Youth suicide rates are a serious concern in Vermont. See Vermont Department of Health, [Annual Suicide Data Report](#), June 2025, at 4 (“The percent of high school students who attempted suicide in the past 12 months significantly increased between 2009 and 2023 (4% vs 7%). Rates are statistically higher among females; younger students; those living in rural areas; students who are Black, Indigenous, and People of Color (BIPOC); students who are LGBTQ+; and high schoolers who are living with a disability.”).

Page 29:

- Chart: Data from 11/1/24 to 10/31/25. Youth missing on 10/31/25 were counted as found on that date. Transgender youth included by identified gender. Data obscured where necessary to protect identity of individual children and youth.

Page 30:

- Third bullet: For development of “staffings” post-Woodside, in era of sufficient residential capacity, see DCF “[Report on Long-Term Plan for Justice-Involved Youth](#),” November 1, 2020, at 4 (“...establishing the Horizon Apartment, and effective November 1, 2020, converting 4 of these beds into beds for youth who otherwise would have gone to Woodside.”).

Sources and Citations for Pages 31-36

Pages 31:

- First bullet: Chloe Jones, Calah Schlabach and Daja E. Henry, "Judged by two systems: 60% of incarcerated kids have child welfare background." August 21, 2020; The National Child Traumatic Stress Network, Victimization and Juvenile Offending, 2016; OCYFA analysis of confidential DCF data, on file at OCYFA.
- Pie chart: Utilization data starts on first day Red Clover held four youth, December 26, 2024, (October 22, 2024 to December 25, 2024 excluded from analysis) and runs through close of DCF reporting period on October 17, 2025. In response to a draft of this report, DCF asserted that Red Clover was not licensed for four youth until February 18, 2025, and therefore the facility was "full" more than the OCYFA analysis suggests. When the OCYFA pointed out that Red Clover held four youth on more than 20 days prior to February 18, 2025, DCF asserted that that was likely due to licensing "variances" but could not identify the specific days on which those variances were in effect. Because by all indications DCF could or did place up to four youth at Red Clover from 12/26/24 on, the OCYFA believes that 58% full is accurate. OCYFA will continue to analyze Red Clover utilization data going forward. Additional data questions are: How many times "would" a youth have been placed at Red Clover, but was not because it was full? (i.e. On how many days did DCF "need" five or more locked beds?), and how many youth were held in adult facilities such as Marble Valley, even when there was a bed available at Red Clover? DCF often claims that additional locked youth beds would mean fewer youth are sent to adult facilities like Marble Valley. But DCF also frequently reminds OCYFA that it does not "place" youth in adult facilities. DCF appears to have no plans to track data on youth in adult facilities, even when those children are in its legal custody, despite the fact that DCF is the legal parent of many of those children.
- Eighth bullet: For data on youth held in adult facilities, see Liam Elder-Connors, Vermont seeks new developer for locked juvenile facility. | Vermont Public, October 27, 2025. Federal law requires that minors held in adult facilities be sight and sound separated from adult inmates, except in limited circumstances, in what amounts to solitary confinement for the majority of every day. See Columbia Justice Lab, "Raising the Upper Age of Juvenile Jurisdiction: Implications of Federal JJDP and PREA Requirements." 2019.
- Last bullet: See Department of Justice, correspondence with Vermont DCF, 2016, on file at OCYFA ("Our concern is heightened further because those children who are placed at Woodside can be detained there for significant periods of time even when DCF staff agrees that a less secure setting would be appropriate if one were available").

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- Caseload reflects total cases worked in 2025, some of which continued from 2024 and/or 2023.
- "Who Requested Assistance?" measures category of caller, which may or may not be the person who OCYFA assisted. Chart names and percentages are: Parent/Home of Origin 34.4%, Community Member 16.4%, Child/Youth 10.7%, Kin Caregiver 8.2%, DCCF 8.2%, Foster/Adoptive Parent 8.2%, Guardian ad Litem 7.4%, School 4.1%, Other 2.5%
- "What Were Callers' Concerns" measures the issue that motivated contact with OCYFA, which may or may not be the assistance OCYFA wound up providing (see next category). Cases can involve multiple concerns, percentages may exceed 100%. Chart names and percentages are: Complaint about DCF 29.2%, Parent Rights 11.1%, Child or Youth Rights, 10%, Safety Concern, Child In Custody 8.1%, Safety Concern, Child Not In Custody 8.1%, Legal Support 6.4%, Discharge Options 6.1%, Disability Rights 5%, Transition to Adulthood 4.4% Kinship Barriers 4.2%, Access to Records 3.6%, State Interagency Concerns 1.9%, Insufficient Language Support 1.9%.
- "What Assistance Did OCYFA Provide?" measures the assistance the OCYFA provided after intake, acceptance, and case goal development, which may or may not match the reason for the initial call. Cases can involve multiple concerns, percentages may exceed 100%. Chart names and percentages are: Connecting to Legal/GAL Support 17.8%, Birth Parent Rights 16.5%, Bridging Care Continuum Gaps 12.8%, Disability Rights 10.3%, Kin Care and Connections 7.9%, Transition Back to Community 7.9%, Sibling Connections 7.4%, Protecting SSA/SSI 7.4%, Economic/Concrete Supports 5.8%, Education Support 4.5%, Act 173 Record Access 1.7%.
- For OCYFA duties and authority, see 33 VSA § 3203. The OCYFA does not provide legal advice.

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