

Exhibit A

State of Vermont Agency of Human Services
Department for Children and Families
Family Services Division

**Practice Guidance: Supporting Conversations with Foster Care Applicants
About Caring for LGBTQ+ Youth**

Policy Information

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Residential Licensing and Special
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Purpose

The Foster Care Application includes a self-assessment questionnaire designed to help applicants reflect on their caregiving interests, strengths, and placement preferences. Among many questions, applicants are asked to respond to the following:

“I am open to caring for a lesbian, gay, bisexual, transgender, or queer (LGBTQ) child/youth.”

This question is one of many intended to help the Division understand where caregivers feel most confident, where they may want additional support or training, and how to make informed

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placement decisions later in the process.

This practice guidance supports the Residential Licensing & Special Investigations (RLSI) Team in having open, neutral, relational conversations with applicants about their experience, comfort level, and readiness to care for LGBTQ+ children and youth. These conversations are not about changing beliefs; rather, they help assess caregiving behaviors, understand strengths and limitations, and support thoughtful, well-aligned future placement matching.

While this guidance offers focused considerations for LGBTQ+ youth, it builds directly on the Division's existing matching philosophy and practices. LGBTQ+-specific guidance is an extension of the work we already do to match children and caregivers across a wide range of identities, needs, interests, behaviors, trauma responses, cultures, and experiences. Over time, this framework will continue to expand to provide even broader, more integrated guidance that supports thoughtful matching for all children and youth.

Guiding Principles

1. Conversations focus on caregiving capacity — not beliefs.

Applicants bring diverse lived experiences, values, cultures, and comfort levels. Conversations during the licensing process aim to understand caregiving approaches, day-to-day interactions with youth, and the environment a young person would experience in the home. They do not evaluate or interpret an applicant's personal beliefs. The emphasis is on how a caregiver interacts with and cares for youth, not why they hold particular viewpoints.

2. Safety — physical and emotional — is the core licensing focus.

All licensed caregivers must provide a home free from rejection, shaming, discriminatory behavior, or hostility. This expectation applies to all children and youth, including LGBTQ+ youth. Licensing aims to gather information about whether caregivers can demonstrate safe, supportive, non-judgmental, and non-discriminatory care in their day-to-day interactions and caregiving practices.

Licensing evaluates all aspects of physical and emotional safety. Concerns about safety are addressed through existing licensing processes when there is evidence that a caregiver's actions, responses, or home environment may place a child at danger or risk. Holding or respectfully expressing personal, religious, or moral beliefs alone does not constitute a licensing concern.

3. Limitations belong in the placement matching process.

Applicants may identify comfort levels, preferences, or areas where they feel less prepared. These do not affect licensure. Instead, they help guide later placement decisions, which consider the needs and identities of actual children and youth—not hypothetical situations. Consistent with Division practice, placement decision-making begins with family finding and exploration of kin and fictive kin resources and continues throughout an open case, regardless of current placement, to promote permanency and

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lifelong family connections. Matching is an ongoing process, and a caregiver's strengths, preferences, and limitations are revisited to ensure the best possible fit for each youth. Licensure establishes whether a home is safe; matching supports whether a particular home is the right fit for a specific youth at a specific time.

4. Caregivers vary in experience, comfort, and readiness—and that is expected.

Adults naturally differ in their familiarity with identities, cultures, or experiences that may be new to them. Because licensing decisions rely on information gathered during the time-limited applicant interview and site evaluation, the goal is to understand where applicants are beginning—not to anticipate future behaviors or evaluate viewpoints. The information gathered helps guide conversations, not predict or assume caregiver actions. Information gathered is used to guide supportive conversations and placement planning, not to presume future misconduct.

5. Licensing evaluates behavior, not viewpoints.

On behalf of the Department and Division, RLSI requires caregivers to maintain a safe, stable, and non-discriminatory home. The foster care application process does not require applicants to adopt, express, or endorse specific beliefs, viewpoints, or language as a condition of approval. This approach honors both child safety and caregiver autonomy while ensuring regulatory compliance.

Applicants' sincerely held personal, cultural, religious, moral, or philosophical beliefs shall not be considered in the licensing process. Applicants shall not be excluded based on any such beliefs nor on an intent to live, parent, and make day-to-day caregiving decisions consistent with those beliefs, so long as required standards of safety, care, non-discrimination, and respect for a child's safety, well-being, and dignity are met.

Licensing decisions are based on observable caregiving behaviors and demonstrated capacity to meet required standards in practice. In evaluating applications, the Division distinguishes between:

- Beliefs or viewpoints, which are not evaluated for licensure;
- Respectful, age-appropriate, and non-coercive communication, which is permitted; and
- Behaviors that cause harm, coercion, exclusion, or discrimination, which are not permitted and may affect licensure.

An applicant's statements of belief or personal conviction during the licensing process may not, by themselves, constitute evidence of risk, harm, or noncompliance.

Core Behavioral Expectation

Caregivers must provide a safe home free from rejection, shaming, or discriminatory behavior. This includes the ability to:

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- respond to children and youth in ways that do not cause physical, emotional, or psychological harm
- maintain an environment where youth feel safe expressing themselves
- refrain from behaviors that ridicule, demean, or isolate a youth
- partner with DCF and providers to ensure youth needs are met
- support the youth's hobbies, interests, and passions
- support youth in accessing school or community activities that promote safety and belonging

Children & Youth's Rights Framework

Children and youth must always be at the center of the Division's work. While this is not an exhaustive list below, caregivers must uphold the rights of children and youth in foster care, including the right to:

- have their identity, culture, religious, moral, and philosophical beliefs, and lived experiences understood and respected in placement
- maintain meaningful connections with family, kin, and community supports
- participate in decisions about who they live with and what type of caregiver or home environment feels safe
- have their voice and perspective meaningfully included and elevated in case planning and decision-making
- express their personality and identity through clothing, hairstyle, cultural practice, or other forms of self-expression
- be free from shaming, punishment, coercion, or attempts to change who they are
- access supportive environments (e.g., school groups, counseling, peer supports)
- partake in or decline participation in religious activities without consequences, discipline, or retaliation
- experience safety, dignity, and nondiscrimination in their home

These expectations establish the minimum standard of care required for every licensed home and reflect Vermont's responsibility to protect children – not to impose a particular viewpoint on caregivers. A caregiver's failure to use particular language or adopt certain beliefs does not itself violate these rights.

Areas RLSI Evaluates and May Explore Through Conversation

RLSI staff may use open-ended, neutral questions to understand:

- the caregiver's comfort supporting youth with diverse identities
- how the caregiver responds when a youth shares something personal or unfamiliar
- their typical approach to providing stability, belonging, and emotional support
- areas where additional training or information may be helpful

These conversations occur during the licensing phase to understand general caregiving capacity. They are not used to determine placement suitability for any specific child, which is addressed separately through the placement matching process.

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As part of these conversations, RLSI will explain the regulations caregivers must follow, what types of actions could violate those regulations, and the potential consequences. This supports informed caregiving and clear expectations.

At the same time, RLSI does not assume that an applicant will engage in prohibited conduct simply because of their stated beliefs, values, or identified limitations. Conversations focus on actual caregiving behavior, not possible future violations.

What RLSI Does Not Evaluate

Licensing does not require:

- endorsement or affirmation of specific identities
- agreement with certain viewpoints
- changes to personal, cultural, religious, moral, or philosophical beliefs
- use of particular vocabulary, prescribed language, or preferred pronouns related to gender identity, sexual orientation, or identity expression
- answers to certain hypothetical ideological or future-speech scenarios
- discussion of medical decisions that caregivers cannot independently make¹
- agreement to facilitate medical appointments or procedures related to gender affirming care
- personal agreement with, or adoption of, specific terminology, identity frameworks, or expressive practices as a condition of licensure, so long as the caregiver's conduct remains respectful, non-coercive, and consistent with safety requirements.

Placement Matching Considerations

Placement matching is guided by the young person's needs, voice, and sense of belonging. Matching decisions consider:

- the youth's identity, lived experience, and expressed preferences
- their need for a placement where they feel safe, respected, and able to be themselves
- the importance of cultural, familial, and community connections
- the caregiver's strengths, caregiving style, and willingness to learn or seek support
- any limitations that may affect a youth's experience in the home

Expressing limitations or preferences around caring for children and youth with diverse identities,

¹ When a young person is in DCF custody, caregivers are provided with the Division's Caregiver Authorization Letter. This letter permits caregivers to obtain routine and emergency medical treatment for the child. Caregivers are not the legal medical decision-makers for children in DCF custody. Medical decision-making authority remains with the Department, in consultation with the young person (as age- and developmentally appropriate), medical providers, and parents.

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experiences, or needs—including preferences related to age, behaviors, medical, developmental, or mental health needs, or LGBTQ+ identity—is not inherently discriminatory. These are normal considerations that belong in matching, not licensing. This approach allows caregivers to voluntarily identify the populations they feel most prepared and equipped to support.

Belonging matters. Children and youth experience better outcomes when placed with caregivers who can support their identity, culture, and expression—whether related to race, ethnicity, religion, sexual orientation, gender identity, disability, trauma history, or other lived experiences. Caregivers do not need specialized expertise; they need the ability to create a safe environment and a willingness to learn.

Matching is not about ideology; it is about fit. A caregiver's stated preferences or limitations—including those related to caring for LGBTQ+ youth—help the Division identify the best possible match between a youth's needs and a caregiver's strengths and readiness.

Youth voice matters. Young people may express their preferences regarding placement, identity, connections, and other personal experiences when they feel ready to do so. Youth engagement is central to identifying supportive placements.

Because some youth may not yet be aware of, or ready to share, aspects of their identity, background, trauma history, needs, or other sensitive experiences when entering care, regular contacts by Family Services Workers, attorneys, and GALs serve as important safeguards to ensure youth safety and emotional well-being.

The Division works to ensure that each youth is matched with caregivers who can safely and confidently meet their needs. Youth also have the right to request consultation with the Commissioner's Committee on LGBTQ Issues if they feel unsafe, unsupported, or discriminated against.

Discussion Prompts

The questions below are examples of prompts that may be used to support open, relational conversation. They are not exhaustive, nor is each question required in every discussion.

- “Tell me about your experience supporting young people whose identities or experiences are different from your own.”
- “How comfortable do you feel supporting a young person who identifies as LGBTQ+?”
- “When a youth shares something important about themselves, what does support look like in your home?”
- “How do you create an environment where youth feel safe talking about what is happening in their lives?”
- “Youth sometimes share things that surprise adults. How do you typically respond?”
- “If a young person expressed something personal about their identity or came out to you, how would you respond?”

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- “Are there areas where you would like more information or support to feel prepared for different types of placements?”
- “When a youth raises questions or experiences that feel new, what helps you learn or find guidance?”
- “It’s completely normal to have areas where you feel more or less confident. Are there particular placement situations where you feel you’d be a strong fit—or not the best fit?”
- “Are there any preferences or limitations you’d like us to keep in mind for matching?”

Conclusion

This practice guidance is an early step in strengthening how we engage applicants, understand caregiving capacity, and support thoughtful placement matching. It will continue to grow and evolve as we learn from staff, caregivers, youth, partners, and ongoing implementation efforts. Updates to the Foster Care Application and Renewal Application, along with development of a companion matching tool for district staff are also in development, which will help bridge the licensing and placement phases to ensure alignment with the Division’s broader matching philosophy.