



COPY

GOOCHLAND DEPARTMENT OF SOCIAL SERVICES

April 16, 2026

Department of Behavioral Health and Developmental Service
Attention: Jae Benz
P.O. Box 1797
Richmond, Virginia 23218-1797

Dear Ms. Benz:

Per the Code of Virginia, Goochland Department of Social Services (GDSS) is the authority to investigate instances of Child Abuse and Neglect for facilities that are located within our jurisdiction. (VAC 63.2-1503) This authority extends to out-of-family settings and residential programs for children. GDSS has a legal right to access information necessary to conduct investigations. Per VAC 63.2-1505, our agency is mandated to determine immediate safety needs and future risk of harm, making an immediate investigation and completing a report within 45 days.

Hallmark Youth Care (Hallmark) is located at 12800 W. Creek Parkway in Goochland County and is legally obligated to cooperate with these investigations. This cooperation includes providing access to victim child, recordings, incident reports and records.

We are reaching out to share concerns regarding ongoing barriers implemented by Hallmark Youth Care since May 19th, 2025. These requirements impede our ability to conduct thorough, timely Child Abuse investigations mandated by law.

Summary of non-cooperation:

- Hallmark requires GDSS to present an Administrative Subpoena prior to initiating any investigation at their facility. This requirement is time consuming and creates delays that may result in the dilution of information shared by the victims and witnesses. We believe completing an Administrative Subpoena has no basis in the Virginia Code. (Attachment A)
- On [REDACTED], 2025, Hallmark staff stated that GDSS could not interview the victim children without a staff person being present in the room. Per VAC 63.2-1518, GDSS has the authority to speak with the alleged victim child or to any of [REDACTED] siblings without consent of and outside the presence of [REDACTED] parent, guardian, legal custodian, or other person standing. (Attachment B)

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- On November 17, 2025, GDSS received a referral alleging that a Hallmark employee displayed a weapon within the facility. Despite the severity of the allegation, our records indicate that Hallmark failed to report the incident to our agency. GDSS launched an investigation and upon reviewing video footage noticed that several seconds were missing during the timeframe the weapon was allegedly displayed, preventing a visual account of the incident. (Attachment C)
- On [REDACTED] 2026, GDSS requested records for an alleged victim youth. Hallmark staff emailed that GDSS was required to complete a Substance Use Disorder form for the youth. Per the email *"Please complete page one in its entirety, being sure to indicate the PHI that is being requested, state the reason for the disclosure, and provide a requestor signature in Section C on page two. Once we have received the completed form back from you, we will attempt to contact the legal guardian to get the former resident and her legal guardian's signed consent to release these records. Both signatures will need to be obtained for us to release the requested information".* Requirement of this form with signatures from our agency and the legal guardian further delays access to critical information and delays our investigation. We believe the requirement of our agency completing the SUD form has no basis in the Virginia Code. (Attachment D)

Goochland Social Services attempted to mediate with Hallmark but they are entrenched in their decision. To ensure the safety of youth at Hallmark Youth Care and to maintain the integrity of statutory investigative processes, Goochland Department of Social Services formally requests that the Department of Behavioral Health and Developmental Services take the following actions:

- Issue a formal directive to Hallmark Youth Care to cease requiring Administrative Subpoenas and Substance Use Disorder (SUD) forms as a prerequisite for GDSS access. We request that DBHDS affirm our statutory right to access records under the **Code of Virginia**, ensuring investigations are not hindered by unnecessary administrative barriers.
- Reiterate to facility leadership that GDSS is authorized by **VAC 63.2-1518** to conduct private, unobserved interviews with children and witnesses immediately upon arrival. This is essential to prevent the potential dilution of testimony or undue influence from facility staff.
- Formally remind Hallmark Youth Care of their legal obligations as mandated reporters to notify GDSS of all suspected child abuse and neglect in a timely and consistent manner.
- Immediately reinstate joint investigative protocols between the assigned DBHDS Licensing representative and the GDSS investigating worker to ensure comprehensive oversight and information sharing.

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Goochland Department of Social Services is deeply concerned that current barriers imposed by Hallmark Youth Care are compromising our ability to conduct timely, thorough, and legally compliant investigations. We look forward to your prompt response and intervention to resolve these systemic issues.

Respectfully,

Kimberly Jefferson
Director, Goochland Social Services.

Attachments:

- A. Administrative Subpoenas
- B. OASIS narrative documenting Hallmark denying GDSS access to youth
- C. OASIS narrative documenting employee with weapon (video footage available upon request)
- D. Substance Use Disorder form email from employee

Cc: Hannon Wright, Esq. Family Services Attorney for Goochland Social Services
Eric Reynold, Esq. Office of Children's Ombudsman
Betsy Wright, Goochland Social Services Board Chair

Certified mail: 7022 1670 0001 9374 7127

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