pennsylvania
DEPARTMENT OF PUBLIC WELFARE

AUG 19 2013

Dr. Randy A. Ireson, Executive Director
Glen Mills School
C/O Chris Spriggs, Dir. of Regulatory Compliance
P.O. Box 5001 – Glen Mills Schools
1496 North Center Avenue
Concordville, Pennsylvania 19331

RE: McKinley Hall
185 Glen Mills Road
Glen Mills, Pennsylvania 19342
License # 137300

Dear Dr. Ireson:

As a result of the Department of Public Welfare's licensing inspection on April 8, 2013, April 9, 2013, April 10, 2013 and April 11, 2013, of the above-named facility, the violations with 55 Pa.Code Ch. 3800 (relating to Child Residential and Day Treatment Facilities) specified on the enclosed Licensing Inspection Summary were found.

All violations specified on the enclosed Licensing Inspection Summary must be corrected by the dates specified on the Licensing Inspection Summary and continued compliance with 55 Pa.Code Ch. 3800 must be maintained.

Your regular license for the period of July 1, 2013 to July 1, 2014 was issued on March 26, 2013. Your regular license remains in good standing.

Sincerely,

Ronald Melusky
Director

Enclosure
Licensing Inspection Summary

VIOLATION REPORT
CHILD RESIDENTIAL LICENSING - 55 Pa.Code Chapter 3800

Facility Name: MCKINLEY HALL	License Number: 13730
Address: 185 GLEN MILLS ROAD, GLEN MILLS, PA 19342	County: Delaware
Director: Randy Ireson	Region: SOUTHEAST
Legal Entity Name: GLEN MILLS SCHOOLS	
Legal Entity Address: P.O. BOX 5001, CONCORDVILLE, PA 19331	

Certificate(s) of Occupancy
C-2 LP
08/06/2003
Dept. of Labor & Industry

Program Type:	Licensed Capacity:	Number of Children Served:
Residential Services	81	62

Type of Inspection: Full	BHA Docket Number:	Notice: Announced

Reason(s) for Inspection(s)
Renewal

On-Site Inspections Dates and Department Representatives On-Site
04/08/2013: Havener, Cara; Petrille, Katelyn; Kpange, Thomas; Dietz, Andrew
04/09/2013: Havener, Cara; Petrille, Katelyn; Kpange, Thomas; Dietz, Andrew
04/10/2013: Havener, Cara; Petrille, Katelyn; Kpange, Thomas; Dietz, Andrew
04/11/2013: Havener, Cara; Petrille, Katelyn; Kpange, Thomas; Dietz, Andrew

Off-Site Inspection Dates and Inspectors, if Applicable

Other Details

Partial or Full Triggers:	Random Indicators:

Child Demographic Data as of Inspection Dates

Age of Children:	Number of Children who:
0 to 5 years: 0	Are Adjudicated Delinquent: 62
6 to 13 years: 0	Are Dependent: 0
14 to 17 years: 33	Have Mental Illness: 0
18 to 21 years: 19	Have an Intellectual Disability: 0
	Have a Physical Disability: 0

Licensing Inspection Summary: 13730 - 04/08/2013 - Havener, Cara
Facility Name: MCKINLEY HALL

1. REGULATION 55 Pa.Code §3800
3800.84(d) - Trash in kitchens and bathrooms shall be kept in covered trash receptacles that prevent the penetration of insects and rodents.

2a. DESCRIPTION OF VIOLATION
The trash can in the bathroom in the top 12 section of the facility next to bedroom 1 is not covered.

3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)
Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.

The Glen Mills Schools will only utilize trash cans with lids in the bathrooms and kitchens of Glen Mills Schools. The trash cans in the above mentioned facility were changed on April 20, 2013. The assistant Group Living Director [redacted] is responsible for periodically checking to make sure that the trash cans in the bathrooms and kitchens have lids.

Repeat Violation: No	Date(s) of Previous Violation(s):			
Signature of Legal Entity Representative (Required on EVERY Page)	Randy Ireson			
Printed Name and Title of Legal Entity Representative (Required on EVERY Page)	Dr. Randy A. Ireson	Date	May 23, 2013	

DEPARTMENT USE ONLY - FACILITIES MAY NOT WRITE BELOW THIS LINE!

The above plan of correction is approved as of 7/7/13 (Date)

The above plan of correction was approved by QT (Initials)

Plan of correction implementation status as of 7/23/13 (Date)

- [x] Fully Implemented
- [ ] Partially Implemented - Adequate Progress
- [ ] Partially Implemented - Inadequate Progress
- [ ] Not Implemented

Licensing Inspection Summary: 13730 - 04/08/2013 - Havener, Cara
Facility Name: MCKINLEY HALL

1. REGULATION 55 Pa.Code §3800
3800.102(i) - Bunk beds shall be equipped with securely attached ladders capable of supporting a staff person.

2a. DESCRIPTION OF VIOLATION
The top bunks of the bunk beds in bedrooms 1 - 6 in the Bottom 11 section of the facility, bedrooms 1 - 7 in the top 11 section of the facility and bedrooms 1 - 7 in the Bottom 12 and Top 12 sections of the facility are not equipped with a secure safety rail on each open side of the bunk.

3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)
Include steps to correct the violation described above and steps to prevent a similar violation from occuring again. If steps cannot be completed immediately, include dates by which the steps will be completed.

In adherence with PA Code Title 55 § 3800.102 (i), the bunk beds in the above mentioned building are being fitted with securely attached ladders. Photographic documentation of completed work will be provided when the work is completed. All the bunk beds in the above mentioned building will have ladders installed on each open side by the maintenance department of Glen Mills Schools by Friday June 28, 2013. The assistant Group Living Director [redacted] will conduct periodic checks of the Bunk Beds in each building to assure that ladders are securely attached, and have not been removed.

Repeat Violation: No	Date(s) of Previous Violation(s):			

Signature of Legal Entity Representative (Required on EVERY Page) Randy Ireson

Printed Name and Title of Legal Entity Representative (Required on EVERY Page) Dr. Randy A. Ireson

Date May 23, 2013

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The above plan of correction is approved as of 7/2/13 (Date)

The above plan of correction was approved by _____ (Initials)

Plan of correction implementation status as of 7/23/13 (Date)

- [X] Fully Implemented
- [ ] Partially Implemented - Adequate Progress
- [ ] Partially Implemented - Inadequate Progress
- [ ] Not Implemented

Licensing Inspection Summary: 13730 - 04/08/2013 - Havener, Cara
Facility Name: MCKINLEY HALL

1. REGULATION 55 Pa.Code §3800
3800.130(h) - There shall be a written procedure for fire safety monitoring if the smoke detector or fire alarm becomes inoperative.

2a. DESCRIPTION OF VIOLATION
The facility does not have a written procedure for fire safety monitoring in the event that the smoke detector or fire alarm becomes inoperative.

3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)
Include steps to correct the violation described above and steps to prevent a similar violation from occuring again. If steps cannot be completed immediately, include dates by which the steps will be completed.

The Glen Mills Schools has an automated fire detection system that is located in a building that is equipped with a backup generator. In adherence with PA Code Title 55 § 3800.130(h), the Glen Mills Schools developed a written procedure for fire safety monitoring, to be used if the smoke detector or fire alarm becomes inoperative. The inoperative procedure is included as Attachment I, and was deemed official policy (See Attachment I-1) on May 23, 2013 . The Group Living Director [redacted] is responsible for the development and adherence to the procedure.

Repeat Violation: No	Date(s) of Previous Violation(s):			
Signature of Legal Entity Representative (Required on EVERY Page)	Randy Ireson			
Printed Name and Title of Legal Entity Representative (Required on EVERY Page)	Dr. Randy A. Ireson	Date May 23, 2013		

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The above plan of correction is approved as of 7/9/13 (Date)

The above plan of correction was approved by QT (Initials)

Plan of correction implementation status as of 7/23/13 (Date)

- [x] Fully Implemented
- [ ] Partially Implemented - Adequate Progress
- [ ] Partially Implemented - Inadequate Progress
- [ ] Not Implemented

Licensing Inspection Summary: 13730 - 04/08/2013 - Havener, Cara
Facility Name: MCKINLEY HALL

1. REGULATION 55 Pa.Code §3800
3800.141(a) - A child shall have a written health and safety assessment within 24 hours of admission.

2a. DESCRIPTION OF VIOLATION
Child 1 was admitted to the facility on 3/1/2013. The health and safety assessment for Child 1 was not completed until 3/4/2013.

3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)
Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.

In adherence with PA Code Title 55 § 3800.141(a) all youth will have a medical assessment completed within 24 hours of their arrival. This is to include youth that come on the weekends. This process was implemented on April 19, 2013. The Admissions Director [redacted] will be responsible for making sure that the medical assessment is completed in the required 24 hours after arrival, and that all documents are dated correctly.

Repeat Violation: No	Date(s) of Previous Violation(s):			

Signature of Legal Entity Representative (Required on EVERY Page) Randy Ireson

Printed Name and Title of Legal Entity Representative (Required on EVERY Page) Dr. Randy A. Ireson

Date May 23, 2013

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Licensing Inspection Summary: 13730 - 04/08/2013 - Havener, Cara
Facility Name: MCKINLEY HALL

1. REGULATION 55 Pa.Code §3800
3800.144(b) - A child who is 3 years of age or older shall have a dental examination performed by a licensed dentist and teeth cleaning performed by a licensed dentist or dental technician at least semiannually. If a child has not had a dental examination and teeth cleaning within 6 months prior to admission, a dental examination and teeth cleaning shall be performed within 30 days after admission.

2a. DESCRIPTION OF VIOLATION
Child 2's last dental exam was completed on 9/27/2012.

A dental exam was completed for Child 3 on 4/13/2012 and the next exam was not completed until 11/26/2012.

3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)
Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.

Prior to the establishment of the Regulatory Compliance Guide (RCG), the interpretation of 3800.144(b) was "...teeth cleaning performed by a licensed dentist or dental technician at least **semiannually**". Since the formation of the Bureau of Human Services Licensing, the interpretation of 3800.144(b) specifies that semiannually means every six months. The dental examinations in question were definitely semiannually, but fell outside of the 6 month mark by just a few days. In compliance with PA Code Title 55 § 3800.144(b), dental appointments will now be scheduled prior to the six month mark, being that the interpretation of semiannually has changed. This procedure was established on April 19, 2013. The dental center supervisor [redacted] is responsible for scheduling students and will provide oversight to assure that students receive their "semiannual" examinations within six months.

Child 2 received a dental exam on 4/11/13. GT 7/23/13

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Date May 23, 2013

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Plan of correction implementation status as of 7/23/13 (Date)

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- ☐ Not Implemented

Licensing Inspection Summary: 13730 - 04/08/2013 - Havener, Cara
Facility Name: MCKINLEY HALL

1. REGULATION 55 Pa.Code §3800

3800.149(a) - The facility shall have a written emergency medical plan listing the following:
(1) The hospital or source of health care that will be used in an emergency.
(2) The method of transportation to be used.
(3) An emergency staffing plan.
(4) Medical and behavior health conditions or situations under which emergency medical care and treatment are warranted.

2a. DESCRIPTION OF VIOLATION

The facility's emergency medical plan does not include the behavior health conditions or situations under which emergency medical care and treatment are warranted.

3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)

Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.

Glen Mills Schools has a Medical Center on the grounds of the facility. Non-life threatening emergencies are triaged on the grounds by medical professionals before emergency transportation arrives. In adherence with PA Code Title 55 § 3800.49 (a) 1-4 the Emergency Medical Plan for Glen Mills Schools is included as Attachment K. This plan was enacted on May 22, 2013. The supervising nurse [redacted] is responsible for updating the Emergency Medical Plan and oversight of its use.

Repeat Violation: No	Date(s) of Previous Violation(s):			

Signature of Legal Entity Representative (Required on EVERY Page) Randy Ireson

Printed Name and Title of Legal Entity Representative (Required on EVERY Page) Dr. Randy A. Ireson

Date May 23, 2013

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The above plan of correction is approved as of 7/1/13 (Date)

The above plan of correction was approved by _____ (Initials)

Plan of correction implementation status as of 7/23/13 (Date)

- [X] Fully Implemented
- [ ] Partially Implemented - Adequate Progress
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Licensing Inspection Summary: 13730 - 04/08/2013 - Havener, Cara
Facility Name: MCKINLEY HALL

1. REGULATION 55 Pa.Code §3800
3800.151 - A staff person or volunteer who comes into direct contact with the children or who prepares or serves food, shall have a statement signed and dated by a licensed physician, certified registered nurse practitioner or licensed physician's assistant, within 12 months prior to working with children or food service and every 2 years thereafter, stating that the person is free of serious communicable disease that may be spread through casual contact or that the staff person has a serious communicable disease that may be spread through casual contact but is able to work in the facility if specific precautions are taken that will prevent the spread of the disease to children.

2a. DESCRIPTION OF VIOLATION
Staff Member A had health statements signed and dated by an appropriate medical professional on 2/3/2010 and 5/1/2012. There were no other health statements for Staff Member A between 2/3/2010 and 5/1/2012.

3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)
Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.

Staff member A did not work in the above mentioned living unit without his two year physical. The staff at Glen Mills Schools have physicals completed every two years. Of the approximately 340 direct care staff, staff member A was the only staff member whose physical fell beyond the two year threshold. To assure that all staff members receive their physical every two years as required, the supervising nurse [redacted] will document and report any staff member who hasn't had his/her physical in the prescribed time frame. As of April 19, 2013 any staff member who has not had a physical within the required two years will not be permitted to work until the physical is completed.

Withdrawn
GT 7/7/13

Repeat Violation: No	Date(s) of Previous Violation(s):			

Signature of Legal Entity Representative (Required on EVERY Page) Randy Ireson

Printed Name and Title of Legal Entity Representative (Required on EVERY Page) Dr. Randy A. Ireson

Date May 23, 2013

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Licensing Inspection Summary: 13730 - 04/08/2013 - Havener, Cara
Facility Name: MCKINLEY HALL

1. REGULATION 55 Pa.Code §3800
3800.226 - An ISP shall include: (1) through (12).

2a. DESCRIPTION OF VIOLATION
The Individual Service Plans for Child 1, 2, 3, 4 and 5 do not include measurable and individualized goals and time-limited objectives and an evaluation of the child's skill level for each goal.

3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)
Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.

The Glen Mills Schools asserts that the current ISP goals meet the requirements outlined in PA Code Title 55 § 3800.226 (1-12). However, in adherence with PA Code Title 55 § 3800.226 (1-12) Glen Mills Schools has developed an ISP that clearly indicate the measurable and individualized goals of the child. In addition, the new ISP format indicates the child's skill level for each goal and the objectives are time limited. The newly developed ISP is included as Attachment L. The Director of Admissions [redacted] is responsible for the ISP including measurable and individualized goals, which are time limited, and evaluate the child's skill level for each goal. The new ISP format will be fully enacted by Friday June 28, 2013.

Repeat Violation: No	Date(s) of Previous Violation(s):			

Signature of Legal Entity Representative (Required on EVERY Page) Randy Ireson

Printed Name and Title of Legal Entity Representative (Required on EVERY Page) Dr. Randy A. Ireson

Date May 23, 2013

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The above plan of correction was approved by AT (Initials)

Plan of correction implementation status as of 7/23/13 (Date)

- ☐ Fully Implemented
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- ☐ Partially Implemented - Inadequate Progress
- ☐ Not Implemented