COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

DATE: DEC 13 2013

SUBJECT: Human Services Licensing – Glen Mills Schools

TO: [redacted] Director
Bureau of Hearings and Appeals

FROM: [redacted] Acting Director
Bureau of Human Services Licensing
Room 631, Health and Welfare Building

Attached is a request for appeal from Glen Mills Schools appealing the Department's decision to DENY a waiver. Also attached is the Department's enforcement action.

Please notify this office, as well as Pat Marano, Office of General Counsel, 801 Market Street, Suite 6092, Philadelphia, Pennsylvania 19107 as to the date and time of the appeal hearing. If you have any questions, please call me at 783-3670.

Attachments

cc: [redacted]

pennsylvania
DEPARTMENT OF PUBLIC WELFARE

DEC 18 2013

[redacted]
Vilim & Maddox, LLC
11 South Olive Street, 2nd Floor
Media, Pennsylvania 19063

RE: Glen Mills Schools

Dear Mr. Vilim:

This is to acknowledge receipt of your request to appeal the Department of Public Welfare's (Department) decision to DENY a waiver for Glen Mills Schools. Your request has been forwarded to the Department's Bureau of Hearings and Appeals. You will be contacted regarding the date and time of the hearing.

Sincerely,

[redacted]

cc: [redacted]

VILIM & MADDOX, LLC
ATTORNEYS AT LAW
11 SOUTH OLIVE STREET
SECOND FLOOR
MEDIA, PA 19063
610 566-0711
FACSIMILE 610 566-7711

[redacted]

RECEIVED
DEC 16 2013
Human Services Licensing

TELECOMMUNICATIONS MESSAGE

DATE: 12.16.13

COMPANY: Bureau of Human Services Licensing/DPW

ATTENTION: [redacted]

FROM: [redacted]

NO. OF PAGES: 9
(INCLUDING THIS COVER SHEET)

COMMENTS:

CONFIDENTIALITY NOTICE: The information contained in this telecommunication message is privileged and confidential, and intended only for the use of the individual (s) and/or entity (ies) named above. If you are not the intended recipient, you are hereby notified that any unauthorized disclosure, copying, distribution or taking of any action in reliance on the contents of the telecopied materials is strictly prohibited and review by any individual other than the intended recipient shall not constitute waiver of the attorney/client privilege. If you have received this transmission in error, please immediately notify us by telephone to arrange for return of the materials. Thank You!

IF YOU DO NOT RECEIVE ANY OF THESE PAGES, OR HAVE ANY QUESTIONS ON THE CONTENT, PLEASE CALL _____ AT (610)566-0711 OR FAX AT (610)566-7711.

VILIM & MADDOX, LLC

ATTORNEYS AT LAW
11 S. Olive Street
2nd Floor
MEDIA, PA 19063
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email firm@vilimandmaddox.com

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DANIEL R. GAGE (Of Counsel)* — dgage@vilimandmaddox.com
*Also NJ Bar and LLM in Taxation, MBA

December 16, 2013

RECEIVED
DEC 16 2013
Human Services Licensing

[redacted] Enforcement Manager
Bureau of Human Services Licensing
Department of Public Welfare
631 Forster Street
Harrisburg, PA 17120

Re: Appeal of The Glen Mills Schools, Inc.
License #'s 113030, 137300, 112860, 113020, 112940, 113010, 112890, 112960, 112980, 112880, 112970, 113060, 113050, 112920

[redacted]

My office represents The Glen Mills Schools, Inc. (referred to hereinafter as Glen Mills). Glen Mills hereby appeals from the withdrawal of a waiver of regulations (55 Pa. Code §§ 3800.54 (b), and 3800.55 (a) and (b)) and denial of an extension of that waiver by DPW, which withdrawal and denial was dated December 6, 2013. A copy of that withdrawal/denial is attached hereto as Exhibit "A." To the extent that the withdrawal and denial also constitutes a rejection of Glen Mills' proposed Plan of Correction submitted in response to the License

Inspection Instrument issued by DPW and dated January 23, 2013, Glen Mills also appeals from that rejection. The bases for this appeal are as follows:

1. The subject of the withdrawal and denial, Glen Mills' request to continue the same staffing patterns that DPW has approved without exception for almost 40 years, was previously approved by DPW as part of a settlement agreement in 2000 and remains enforceable as such. A copy of the "plan of correction" submitted by Glen Mills pursuant to agreements made between Glen Mills and DPW, dated August 15, 2000, is attached hereto as "Exhibit B." A copy of DPW's agreement to accept that plan from both regional and central offices are attached hereto as "Exhibit C" and "Exhibit D."

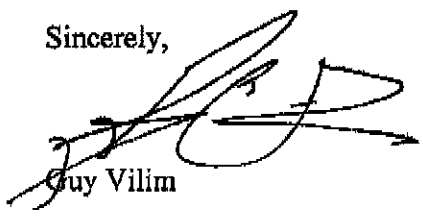
2. The withdrawal/denial is based on a determination by the Bureau that "there is jeopardy to the children," and that, "there is no alternative for providing an equivalent level of health, safety and well-being protection of the children; and the benefit of waiving the regulation does not outweigh the risk to the health, safety and well-being of the children." These determinations are factually unsupportable, irrationally inconsistent with prior opposite determinations by DPW, and disproved by more than 40 years of safe and secure operation of Glen Mills using the same staffing patterns at issue in the withdrawal and denial.

3. Strict enforcement of the regulation, which requires a minimum staff to child ratio of 8:1 during waking hours ignores the unique realities of the Glen Mills campus: all students are older school aged children (high school age or older) and do not require the same immediate adult supervision as younger children; students are absent from the licensed "facilities" for most hours of each

day and it remains unclear whether DPW intends to regulate staffing ratios outside of the licensed "facilities;" for most hours of the day staff and students are dispersed throughout the campus and often participate in programs at much higher staff ratios than those required by the regulations; DPW's withdrawal and denial irrationally ignores the presence of staff on the overall campus but outside of the licensed "facilities" who can, should, and have been counted in staff ratios as part of the system in place to protect students and assure their safety and well-being. Strict and irrational enforcement of an 8:1 ratio will require the hiring of unnecessary staff at wasteful cost to the government and will require the radical alteration of the program of rehabilitation and education at Glen Mills by imposing a level of staff supervision that is only required for infants, very young toddlers, and older students in need of strict security oversight – which Glen Mills does provide WHEN necessary based on a student's behavior, but which is completely unnecessary in a normal high school setting.

4. For the reasons stated herein, DPW can and should maintain the status quo as it has existed for almost 40 years and allow Glen Mills to continue the same staffing on a flexible, campus-based pattern that assures the safety and security of students living and learning in our program.

Sincerely,



Guy Vilim

EXHIBIT A

pennsylvania
DEPARTMENT OF PUBLIC WELFARE

CERTIFIED MAIL – RETURN RECEIPT
MAILING DATE:

Dr. Randy A. Ireson, Executive Director
Glen Mills Schools
P.O. Box 5001
Concordville, Pennsylvania 19331

DEC 0 6 2013

RE: License #s: 113030, 137300, 112860, 113020, 112940, 113010, 112890, 112960, 112980, 112880, 112970, 113060, 113050, 112920

Dear Dr. Ireson:

Thank you for your requests for waivers of 55 Pa.Code Ch. 3800 (relating to child residential and day treatment facilities).You have requested a waiver of 55 Pa.Code § 3800.55(a) and 55 Pa.Code § 3800.55(b) (relating to child care worker) for the licensed facilities listed above.

The Department of Public Welfare (Department) is denying a waiver of 55 Pa.Code § 3800.55(a) and 55 Pa.Code § 3800.55(b) (relating to child care worker) in accordance with § 3800.22(a)(1)-(3) (relating to waivers) since there is jeopardy to the children; there is no alternative for providing an equivalent level of health, safety and well-being protection of the children; and the benefit of waiving the regulation does not outweigh any risk to the health, safety and well-being of the children. The primary benefit of this regulation is that it ensures a sufficient amount of staff are present to supervise and protect children in care.

If you disagree with the Department's decision to deny the waiver, you have the right to appeal through hearing before the Bureau of Hearings and Appeals, Department of Public Welfare in accordance with 1 Pa.Code Part II, Chs. 31-35. If you decide to appeal, a written request for an appeal must be received within 10 days of the date of this letter by:

[redacted] Enforcement Manager
Bureau of Human Services Licensing
Department of Public Welfare
631 Health and Welfare Building
625 Forster Street
Harrisburg, Pennsylvania 17120

This decision is final 11 days from the date of this letter, or if you decide to appeal, upon issuance of a decision by the Bureau of Hearings and Appeals. You are reminded that compliance with the regulation is required until the appeal is heard.

EXHIBIT B



GLEN MILLS SCHOOLS
Service to youth since 1826

C.D.Ferrainola
Executive Director

August 15, 2000

[redacted] Director
Southeast Regional Office
Children, Youth and Family
Department of Public Welfare
502 State Office Building
1400 Spring Garden Street
Philadelphia, PA 19130-4088

Dear Ms. [redacted]

The enclosed document, dated August 14, 2000, is the Glen Mills Schools official corrective action plan in response to the LIS dated 04/20/00 (non compliance areas noted 02/11/00 - 03/31/00).

The corrective action plan comes as a result of the continued, cooperative efforts of Glen Mills and Pennsylvania Department of Welfare. These efforts have allowed the School to preserve its philosophy and mission serving youth, while being in compliance with these new regulations of the Pennsylvania Department of Public Welfare.

Sincerely,

Garrison D. Ipock
Managing Director

Enclosure

12/16/2013 MON 15:31 FAX

The following is the amended/revised response of The Glen Mills Schools

to the Pennsylvania Department of Public Welfare

Regarding Areas of Non-compliance Noted: 2/11/00 to 3/31/00

August 14, 2000

011/094

LICENSING/APPROVAL/REGISTRATION INSPECTION SUMMARY

NAME OF AGENCY/FACILITY	TELEPHONE	OCYF REGIONAL STAFF APPROVAL	DATE
Glen Mills School	(610)459-8100		
ADDRESS	COUNTY		
Concordville, PA 19331	Delaware		
INSPECTED BY	INSPECTION DATE		
Beryl Debnam/Robert DiStanislao	02/11/00; 03/16/00		

☐ INITIAL INSPECTION ☐ RENEWAL INSPECTION ☐ COMPLAINT ☐ UNANNOUNCED INSPECTION ☐ RANDOM SAMPLE

1. 55 PA CODE CHAPTER	2. NON-COMPLIANCE AREA	3. CORRECTION REQUIRED	4. REQUIRED CORRECTION DATE	5. PROVIDERS PLAN OF CORRECTION OR RESPONSE	6. STATUS OF CORRECTION
P.S.911(b) Pa. C.S. 340(a)(9), 362(d) Pa. Code 3700.34	On February 11, 2000 the facility prevented departmental staff and two state police officers access to the facility and/or to a child. On the same date, the facility denied the department and state police the opportunity to privately interview a child. Access to the facility and the child and the opportunity to privately interview the child was denied by Chief Executive Officer [redacted] Unit Leader [redacted] and other Glen Mills staff. Details regarding these events are described below. At approximately 1:30PM, the department conducted a site visit in response to an allegation of child abuse. The departmental staff person was accompanied by two state police officers. During the course of the investigation several other allegations of child abuse were received by the State of Delaware Office of Children and	Provide immediate access to the facility its grounds, records, staff and children to representatives of the Department and its authorized agents.	Immediately and ongoing	#1 See Attached Response Page 15	

THE LEGAL ENTITY REPRESENTATIVE MUST COMPLETE COLUMN 5, SIGN ON THE SIGNATURE LINE AT THE BOTTOM AND DATE ALL PAGES OF THIS DOCUMENT. RETURN THIS ENTIRE DOCUMENT TO YOUR REGIONAL OFFICE BY [redacted]

SIGNATURE OF THE LEGAL ENTITY REPRESENTATIVE — TITLE: EXECUTIVE DIRECTOR

(610) 459-8100 — August 14, 2000

12/16/2013 MON 15:31 FAX 012/094

Licensing/Approval/Registration Inspection Summary - Continuation Sheet

REGULATION	2. NON-COMPLIANCE AREA	3. CORRECTION REQUIRED	4. REQUIRED CORRECTION DATE	5. PROVIDER'S PLAN OF CORRECTION OR RESPONSE	6. PLAN OF CORRECTION/RESPONSE STATUS
2	Youth. A state police officer requested access to a child in order to privately interview the child relating to allegations of child abuse. Access to the facility and the child was repeatedly denied and physically obstructed by Unit Leader [redacted] and several other Glen Mills staff, even following explaination by the state police officer that they were obstructing a police investigation of a crime. Although access to the facility continued to be denied, the state police officer eventually located the child and removed him from his living unit, Van Buren Hall, and placed the child in a police vehicle. While seated inside the police vehicle with a state police officer, at least three Glen Mills staff members, including Chief Executive Officer, [redacted] began to yell at the child and the officer. Mr. [redacted] and other Glen Mills staff threatened the state police officer with aggressive movements and speech. Both [redacted] and the staff became increasingly belligerent. The state police officer threatened arrest of the Glen Mills staff if they did not back away. Fearing for the safety of the child and himself, the officer left the facility grounds and took the child to the state police barracks in order to ensure continued safety.				

ensing/Approval/Registration Inspection Summary - Continuation Sheet

SOLATION	2. NON-COMPLIANCE AREA	3. CORRECTION REQUIRED	4. REQUIRED CORRECTION DATE	5. PROVIDER'S PLAN OF CORRECTION OR RESPONSE	6. PLAN OF CORRECTION/RESPONSE STATUS
	At the request of the state police officer, about six to eight additional state police personnel arrived at the scene to assist departmental staff in carrying out its statutory duties. On March 16, 2000 the facility again prevented departmental staff and one state police officer access to five children. On the same date, the facility denied the department and state police the opportunity to privately interview one child. Access and the opportunity to privately interview these children was denied by Chief Executive Officer [redacted] Unit Leader [redacted] and other Glen Mills staff. Details of these events are described below. At approximately 11:00am, the department conducted a site visit in response to an allegation of child abuse. The departmental staff person was accompanied by one state police officer. When the departmental staff person and state police officer requested to see the five children about whom child abuse allegations had been made, the facility denied access to the youth. The departmental staff person reported to his supervisor that access was being denied. The supervisor contacted the jurisdiction responsible for the placement and requested that a contact be made with Glen Mills management so that the children could be interviewed. It was only after this contact was made				

CF 309 (4-83)

ensing/Approval/Registration Inspection Summary - Continuation Sheet

JULATION	2. NON-COMPLIANCE AREA	3. CORRECTION REQUIRED	4. REQUIRED CORRECTION DATE	5. PROVIDER'S PLAN OF CORRECTION OR RESPONSE	6. PLAN OF CORRECTION/RESPONSE STATUS
	that departmental staff were given access to the youth and permitted to interview them. Access to the youth by state police was denied by the facility. While being interviewed by departmental staff, one child reported that he did not feel safe being interviewed at the facility and requested that the interview take place off grounds. The facility denied state police access to the child for the purpose of transporting the child to the state police barracks to interview the child. Access to the child was denied by Glen Mills Chief Executive Officer [redacted] and Glen Mills counsel Guy Villa, Esquire. [redacted] placed his body between the state police officer and the child to prevent the officer from escorting the child to a state police vehicle. The officer was permitted to escort the child off grounds only after he advised [redacted] that he would be arrested if he did not move out of the way.				
51(a) Abuse	Facility staff failed to report two incidents of child abuse regarding B. This child sustained a chipped tooth and chest bruising as a result of corporal punishment administered by two Glen Mills staff members, Z and Y. The child reported the injuries to other staff members and requested that these incidents be noted in the unit log. He also requested medical and dental treatment. No report of alleged child abuse was made by the	Report all incidents in which a youth alleges abuse by a staff member to ChildLine. Revise facility policy regarding reports of alleged abuse and submit to the Department for approval. Once approved, Department staff and facility staff jointly train all facility staff in their responsibility regarding reporting. All youth and their parents must be informed in writing of their right to be free from abuse or mistreatment and must be informed of who they should tell if they	For reporting to ChildLine: Immediately. For revision of facility policy: 5 work days following receipt of LIS. For staff training and documentation in employee record: Complete within 30 calendar	#2 See Attached Response Page 16	

Licensing/Approval/Registration Inspection Summary - Continuation Sheet

REGULATION	2. NON-COMPLIANCE AREA	3. CORRECTION REQUIRED	4. REQUIRED CORRECTION DATE	5. PROVIDER'S PLAN OF CORRECTION OR RESPONSE	6. PLAN OF CORRECTION/RESPONSE STATUS
5	facility nor was the child provided with any medical care.	believe they have been abused by staff at the facility. Document in the youth's record and in the employee's record. After completing this with all youth currently in residence, this must continue with all youth admitted to the program. Documentation of same must be placed in each youth's record. (see also corrective action 3800.32(b)).	days of receipt of LIS. For notice to youth and parents and documentation in records: Complete within 45 calendar days of receipt of LIS.		

CY 309 (4-89)

Licensing/Approval/Registration Inspection Summary - Continuation Sheet

REGULATION	2. NON-COMPLIANCE AREA	3. CORRECTION REQUIRED	4. REQUIRED CORRECTION DATE	5. PROVIDER'S PLAN OF CORRECTION OR RESPONSE	6. PLAN OF CORRECTION/RESPONSE STATUS
51(b) Abuse	The facility's plan of safety for Glen Mills staff member, X, who has been criminally charged with aggravated assault, simple assault and reckless endangerment on February 2, 2000 did not assure the safety of children. On February 11, 2000 it was observed by the State of Delaware Office of Children and Youth staff person that staff person X was still working directly with children in Van Buren Hall. The facility's Managing Director confirmed that X was still working directly with children on March 8, 2000. The facility's plan of supervision regarding 13 pending child abuse investigations did not assure the safety of the subject child and other children being served at the facility. Of the plans of supervision submitted, 11 of the 13 were not submitted within 24 hours of the facility being made aware of the existence of the abuse report. Of the plans received, none were sufficient to assure the safety of the children in residence at the facility upon initial submission. The plans were returned to the facility for resubmission on April 4,2000. The facility notified the Department on April 5, 2000 that those named as alleged perpetrators were no longer employed by Glen Mills Schools. That plan of supervision was accepted by the Department on April 5, 2000.	Prepare and submit an acceptable plan of supervision for all allegations of child abuse within 24 hours of notification to the facility that a report has been received for investigation. Establish and implement facility protocols for use when plans of supervision are needed that include separation of youth and alleged perpetrator, addition of supervision of alleged perpetrator during the investigation, removal of the alleged perpetrator from direct child care and removal of the alleged perpetrator from the facility grounds. Based on the nature of the allegations, plans of supervision could include any of these options.	For submission of plans: Immediately For facility protocols: within 10 work days of receipt of LIS.	#3 See Attached Response Page 17	

DY 309 (4-83)

ensing/Approval/Registration Inspection Summary - Continuation Sheet

ULATION	2. NON-COMPLIANCE AREA	3. CORRECTION REQUIRED	4. REQUIRED CORRECTION DATE	5. PROVIDER'S PLAN OF CORRECTION OR RESPONSE	6. PLAN OF CORRECTION/RESPONSE STATUS
.31 fication ghts rievance dures.	Three children reported that they were told there would be retaliation if allegations of abuse were made regarding Glen Mills staff. One child, A, stated that he was told by staff that if the child said he did not feel safe at Glen Mills and was removed from Glen Mills, that he would go to his state's youth detention center. Another youth, B, stated that he was told by Glen Mills staff that if he said he did not feel safe at Glen Mills, that he would go back to his county's detention center and would have to start his commitment all over again. A third youth, C, stated that he was told by Glen Mills staff in Madison Hall that children who make allegations of child abuse never win. He also stated that after the case is unfounded, Glen Mills would sue the child's parents for false accusations.	Provide all youth and their parents with written notice of their right to lodge grievances or complaints regarding child rights without fear of retaliation by staff. Provide all staff with written notice of the procedures to be followed when a grievance or complaint is made. Provide all staff with written notice that there can be no retaliation of any kind against any youth who files a grievance or complaint. Establish and implement a progressive disciplinary process for use with staff who violate this policy. All written notice and policy statements are to be approved by the Department. Evidence of this must be provided to the Department.	Submit written notice documents to the Department: 15 work days following receipt of LIS. Provide notice to youth and parents and document in youth's record: 20 work days following receipt of the LIS	#4 See Attached Response Page 18	
32(b) fic s	Application of the facility's level system of restrictive procedures subjects children to corporal punishment, threats and harassment. The level system is applied to administer corporal punishment for behavior management purposes. Glen Mills staff are sufficiently threatening to children that one child, D, stated that he inflicted serious injuries to himself in order to get to a medical facility in an effort to report abuse to someone outside the facility. One child, C, wrote to a parent stating that he was hit by staff but asking the	Abolish the seven level behavior management policy. Eliminate all physical contact between staff and youth other than that which complies with the restrictive procedures requirements of Chapter 3800.202-213. (see corrective action for 3800.33(a)) Provide all staff with written notice that the seven level system of behavior management is abolished effective immediately. Establish and implement facility policy regarding the procedures that must be followed prior to any physical contact between staff and youth that comply with 3800.202-213. Establish a progressive disciplinary	Abolish seven levels: Immediately Eliminate physical contact between staff and youth except that which meets the requirements of 3800.202-213; Immediately. Inform youth and document in youth's	#5 See Attached Response Page 19	

:GULATION	2. NON-COMPLIANCE AREA	3. CORRECTION REQUIRED	4. REQUIRED CORRECTION DATE	5. PROVIDER'S PLAN OF CORRECTION OR RESPONSE	6. PLAN OF CORRECTION/RESPONSE STATUS
OC	parent not to report this to anyone for fear of retaliation by staff. One youth, E, stated that staff told him that it was written into Glen Mills policy that children can be punched by staff anywhere from the neck to the waist. Eight of the children reported that they were kicked, punched, "chopped in the throat", slapped, pushed or slammed into walls by eighteen different Glen Mills staff members from six different living units.	program to address staff non-compliance with the policy. Retain a consultant approved by the Department to assist with preparation of facility policy and disciplinary program. Retrain all staff using curriculum and trainers approved by the Department. Conduct staff training with consultant and Departmental staff present. Conduct meetings with all youth with consultant and Departmental staff present. Inform all youth in writing of their rights and the ability to make child abuse allegations that will be reported to ChildLine. After establishing this with all youth currently in residence, all youth admitted to the program must be informed of their right to be free from abuse or mistreatment and documentation signed by the youth must be maintained in the youth's record. All new staff must be trained and a signed statement from the employee must be maintained in the employee record.	records with statement signed by youth: 10 work days following receipt of LIS. Retain Department approved consultant: 15 work days following receipt of LIS. Retrain all staff and document in staff records with signed statement by staff: begin 60 calendar days following receipt of LIS, complete 90 calendar days following receipt of LIS.		

12/16/2013 MON 15:32 FAX 019/094

ensing/Approval/Registration Inspection Summary - Continuation Sheet

REGULATION	2. NON-COMPLIANCE AREA	3. CORRECTION REQUIRED	4. REQUIRED CORRECTION DATE	5. PROVIDER'S PLAN OF CORRECTION OR RESPONSE	6. PLAN OF CORRECTION/RESPONSE STATUS
.32.(e) ific cs	The facility's practice that children are not permitted to speak by telephone with their parent, probation officers or departmental staff without a Glen Mills staff member present is unreasonable and violates the child's right to communicate with others by telephone. Several children interviewed by departmental staff reported that they fear retaliation from Glen Mills staff persons if negative comments are made to callers. Two juvenile probation officers reported to the department in February and March, 2000 that they question the veracity of information they receive from children when speaking with children by telephone due to Glen Mills policy of not permitting private telephone communication. One parent stated that during her visits to her son, she was not permitted to speak privately with him. One child, F, reported that he could not get to a telephone when he was in trouble and was not permitted to speak privately on the telephone as a matter of facility policy.	Provide the opportunity for youth to have private telephone conversations with family members without the presence of facility staff unless such private contact is prohibited by the committing jurisdiction. Establish a policy regarding private telephone calls.	Immediately	#6 See Attached Response Page 20	

:ensing/Approval/Registration Inspection Summary - Continuation Sheet

:GULATION	2. NON-COMPLIANCE AREA	3. CORRECTION REQUIRED	4. REQUIRED CORRECTION DATE	5. PROVIDER'S PLAN OF CORRECTION OR RESPONSE	6. PLAN OF CORRECTION/RESPONSE STATUS
).32(g)(1) :ific i.s.	The facility staff violate the children's right to sent and receive mail by reading all outgoing mail to assure that no negative comments are made by youth to others about their treatment at the facility. Two children, C and D, reported that all outgoing mail is read by facility staff. One child reported that he was able to get a letter telling his mother he was being beaten out of the facility by giving another letter to the staff and then inserting the second letter into the envelope after the staff had read the first letter.	Cease the practice of reviewing outgoing mail for all youth. Outgoing mail may only be reviewed by staff if there is a court order authorizing such a review. Establish policy that prohibits review of outgoing mail except when ordered by the court with jurisdiction over the youth.	Immediately	**#7 See Attached Response Page 21**	
32(k) fic s.	The facility violates the children's right to appropriate medical and dental care. Two children, C and B, sustained injuries as a result of corporal punishment by staff members and were then denied medical and dental treatment for their injuries by facility staff. One child reported that he had a big bump on his head and injuries to his arm that restricted his movement for several days. Another child had a chipped tooth and severe bruising in the chest area such that he could not move following the punishment and could not participate in daily activities on the following day.	Provide medical and dental care to all youth who request care and all youth whose condition indicates to staff that they need care.	Immediately	**#8 See Attached Response Page 22**	

ensing/Approval/Registration Inspection Summary - Continuation Sheet

REGULATION	2. NON-COMPLIANCE AREA	3. CORRECTION REQUIRED	4. REQUIRED CORRECTION DATE	5. PROVIDER'S PLAN OF CORRECTION OR RESPONSE	6. PLAN OF CORRECTION/RESPONSE STATUS
.32(n) ific cs.	On or about February 2, 2000 the facility subjected a child, D, to punishment and discipline that the child stated caused him to inflict serious injuries to himself in order to get to a hospital where he could report alleged abuse by Glen Mills staff persons. On or about February 10, 2000, a child, C, stated to departmental staff that he would kill himself if he was returned to the facility.	Cease all physical contact and verbal harassment of youth.	Immediately (see also corrective action for 3800.32(b))	#9 See Attached Response Page 23	
33(a) bition st vation ghts.	The facility deprived children of the following specific rights: the right to be free from abuse, mistreatment, threats, and harassment, to send mail without having it opened or read by facility staff, to receive appropriate medical and dental care and to be free from extreme methods of discipline, as specified in the violations in this report of 3800.32 (b)(e)(g)(k) and (n)(related to specific rights).	Provide all youth and their parents with written notice of the rights of youth at the facility. In conjunction with Departmental staff, meet with all youth to review the statement of rights and what it means. Submit written notice to be provided to youth and their parents to the Department for approval.	10 work days following receipt of LIS. Documentation of mailing to parents and documentation of receipt of notice signed by youth and placed in youth records: 15 work days following receipt of LIS.	#10 See Attached Response Page 24	
3(b) or	Mr. [redacted] Chief Executive Officer and Mr. [redacted] Managing Director, did not assure the safety and protection of children (those named as victims of alleged child abuse by Glen Mills staff members) following 13 reports of alleged child abuse. [redacted] permitted staff members X, Y and Z to continue to work directly with children after being named in allegations of child abuse in which children sustained injuries that caused severe pain or temporary impairment. Staff	Cease all actions that impede access to youth or obstruct or delay the ability of the Department and its authorized agents to privately interview youth to review facility records or to move freely about the facility grounds.	Immediately	#11 See Attached Response Page 25	

CY 309 14-83

Licensing/Approval/Registration Inspection Summary - Continuation Sheet

REGULATION	2. NON-COMPLIANCE AREA	3. CORRECTION REQUIRED	4. REQUIRED CORRECTION DATE	5. PROVIDER'S PLAN OF CORRECTION OR RESPONSE	6. PLAN OF CORRECTION/RESPONSE STATUS
	member X was permitted to continue to work directly with children after he was named as a perpetrator in an August, 1999 indicated case of abuse and again in a February, 2000 report of alleged abuse. As observed by a staff person from the State of Delaware on February 11, 2000, an assistant district attorney and a state police officer on or about February 15, 2000 and by departmental staff on March 8, 2000, [redacted] continued to permit staff member X to work directly with children.				
55(a) Care r	The facility does not meet the required child care worker to child ratios of one child care worker for every eight children in three facilities. Four staff members from Van Buren facility reported that they are responsible for between 10 and 13 students each. The facility houses 66 students and has four child care workers and two supervisors assigned to it. One child, B, reported that in Johnson facility there are 48 children in residence with four child care staff Monday through Friday and 2-3 child care staff on weekends. One child, G, reported that in Taylor facility there are 68 children in residence and four child care staff.	Add sufficient child care staff to meet the staff to child ratios.	60 calendar days following receipt of LIS.	**#12 See Attached Response Page 26**	

ensing/Approval/Registration Inspection Summary - Continuation Sheet

GULATION	2. NON-COMPLIANCE AREA	3. CORRECTION REQUIRED	4. REQUIRED CORRECTION DATE	5. PROVIDER'S PLAN OF CORRECTION OR RESPONSE	6. PLAN OF CORRECTION/RESPONSE STATUS
.147(a) of cco.	The facility permits the use and possession of tobacco by children and staff persons. On February 11, 2000 a child, C, was permitted to smoke cigarettes sent to him by family members. On March 23, 2000, facility staff W stated that students can bring cigarettes or have them mailed by parents. Any student can smoke if they want to. One parent also reported that she brought cigarettes to the facility for her son. One child, B, reported that students can smoke outside of buildings or wherever there are ashtrays.	Cease all smoking by youth.	Immediately	#13 See Attached Response Page 27	
32(a) riate use trictive ures.(2)	The facility's level system, particularly "touch for attention", was used in a punitive manner for ten children. The level system is applied to administer corporal punishment for behavior management purposes.	Abolish the seven level behavior management system.	See corrective action for 3800.32(b) and 3800.33(a).	#14 See Attached Response Page 28	
ental nty Respon- ies for buse gations.	The facility has conducted its own investigations of child abuse allegations and reached its own conclusions regarding whether the reports are substantiated in violation of 23 Pa.C.S. 63 and 55 Pa. Code Chapter 3490.51, 53 and 81. The Department is the sole civil agency responsible for investigation of allegations of abuse when the allegations relate to persons who are considered agents of a county children and youth agency. In plans of supervision submitted by Managing Director [redacted] and in correspondence from facility counsel [redacted] Esq., regarding nine staff persons, the facility conducted investigations of the allegations and	Cease conducting investigations and interviews with youth who are named as victims in allegations of child abuse until the child abuse investigation has been completed. Notify all facility staff in writing that youth involved in child abuse situations are not to be interviewed by anyone at the facility regarding the incident under investigation until the child abuse investigation has been completed. Provide evidence that written notice has been provided to all staff to the Department.	To cease investigations and interviews: Immediately To issue written notice: 2 work days following receipt of LIS.	#15 See Attached Response Page 29	

Licensing/Approval/Registration Inspection Summary - Continuation Sheet

REGULATION	2. NON-COMPLIANCE AREA	3. CORRECTION REQUIRED	4. REQUIRED CORRECTION DATE	5. PROVIDER'S PLAN OF CORRECTION OR RESPONSE	6. PLAN OF CORRECTION/RESPONSE STATUS
14	made a determination regarding that the reports were not substantiated, the facility determined that no plan of supervision was needed.				

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#1 The Glen Mills Schools reaffirms its position that it shall provide full access to its students, its campus and information regarding students to representatives of the Department of Public Welfare and its authorized agents.

#2 The Glen Mills Schools will report all incidents when there is reasonable cause to suspect, on the basis of medical, professional or other training or experience, that a child coming before them in their professional or official capacity is an abused child, as defined under the Child Protective Services Law. To date 427 staff members, including all direct care workers, have completed training regarding PA Child Protective Services Law and have acknowledged by their signature their understanding and responsibilities related to the Child Protective Services Law. These signed acknowledgments are filed in each employee's Personnel File.

See Appendix for supporting documentation

THE GLEN MILLS SCHOOLS' BEHAVIORAL INTERVENTION AND RESTRICTIVE PROCEDURES STAFF TRAINING PLAN AND CURRICULUM with Quiz – Pages 30-49

STAFF REQUIREMENTS RELATED TO §3800 REGULATIONS – Pages 50-52

Behavioral Intervention/Restrictive procedures Training (Record of Training) – Page 53

#3 The Glen Mills Schools reaffirms that it shall prepare and submit a plan of supervision, for staff members, regarding all allegations of child abuse within 24 hours of oral notification to the facility that a report has been received for investigation by DPW. These plans of supervision will be individually prepared, submitted and followed as accepted based on information supplied by DPW.

#4 To enhance and assure a full and complete understanding of **THE POLICY FOR PROCESSING CONCERNS AND GRIEVANCES** a narrative description and a tracking form for this process were developed to delineate the steps which a student and/or parent(s)/guardian can use if and when they have a problem or concern and/or a grievance. This is the policy used at the Glen Mills Schools; it is the current policy in effect.

To facilitate and assure a full a complete understanding of Child Rights as defined by §3800.32 (a) – (o) Glen Mills Schools' **CHILD'S RIGHTS** was amended for the purpose of clarification and the Glen Mills Schools' document containing the rights defined by §3800.32 (a) – (o) has been re-titled **STUDENT'S RIGHTS**. This document which reflects all rights afforded students at the Glen Mills Schools. §3800.32 (a) – (o) are clearly stated in numbers 1- 18. §3800.32 (a) – (o) are presented in ordinal ranking at the beginning of this document; they are presented in a forthright, up-front, straightforward and direct manner. This is policy used at the Glen Mills Schools; it is the current policy in effect.

To date 427 staff members, including all direct care workers, have completed training regarding **THE POLICY FOR PROCESSING CONCERNS AND GRIEVANCES** and **STUDENT'S RIGHTS** and have acknowledged by their signature their understanding and responsibilities related to these policies . These signed acknowledgments are filed in each employee's Personnel File.

See Appendix for supporting documentation

STAFF REQUIREMENTS RELATED TO §3800 REGULATIONS – Pages 50-52

STUDENT'S RIGHTS – Pages 54-58

THE POLICY FOR PROCESSING CONCERNS AND GRIEVANCES & TRACKING FORM FOR PROCESSING GRIEVANCES – Pages 59-65

#5 A **Behavioral Intervention Plan** and a **Restrictive Procedures Plan** in accordance with §3800.202-213 including staff training, documentation of training, as well as, a progressive staff disciplinary plan are in place. The techniques as described in the aforementioned **Behavioral Intervention Plan** and **Restrictive Procedure Plan** utilized by Glen Mills are designed not to punish or discipline but to change negative behavior to positive pro-social behavior. Students determine if an intervention starts and when it ends solely by their behavior. The system utilized is designed to help, not hurt; students are not permitted to discipline other students. As a matter of clarification, students are not part of the Staff Behavioral Intervention Program. A stand alone document was developed describing how students may verbally confront other students as part of their social program and life skills development. Glen Mills Schools has incorporated its experience and its expertise in the field of delinquency into these policies and practices.

Since July 12, 2000, 15 staff training seminars have been conducted regarding **Behavioral Intervention** and **Restrictive Procedures** with 262 staff retrained. In addition there are seven more training seminars scheduled during the month of August, 2000. It is conservatively estimated that upon completion of this series of scheduled sessions that over 400 staff members will have completed their retraining. Training and retraining will be ongoing.

See Appendix for supporting documentation

STAFF BEHAVIORAL MANAGEMENT PROGRAM – Pages 66-69

STUDENT CONFRONTATION – Pages 70-71

#6 The Glen Mills Schools provides the opportunity for youth to have private telephone conversations. The Student Union provides daily access to a telephone room where unmonitored calls can be made. Business telephones located in the staff offices of our units are also available for student use, i.e. when a student has no phone card or his parent(s)/guardian will not accept a collect call, etc.

Our phone policy is contained in **STUDENT'S RIGHTS** #5 as follows:

> 5. A student has the right to communicate with others by telephone subject to reasonable facility policy regarding circumstances, frequency, time, payment and privacy. Each student may privately communicate with others by use of telephones located in the Student Union. Private phone conversations to or from a Probation Officer, child's Attorney, clergy, parent(s)/guardian are consistent with the student's legitimate need for privacy and his right for confidentiality. §3800.32 (e)

See Appendix for supporting documentation

STUDENT'S RIGHTS – Pages 54-58

#7 The Glen Mills Schools has a written policy regarding student mail. Current policy prohibits reviewing of outgoing mail except in those cases where there is a court order authorizing review. The policy is contained in **STUDENT'S RIGHTS**; a written document describing Specific Rights in §3800.32, which has been furnished to all current students and is provided to all new students on or before arrival.

To date 427 staff members, including all direct care workers, have completed training regarding **STUDENT'S RIGHTS** and have acknowledged by their signature their understanding and responsibilities related to this policy. These signed acknowledgments are filed in each employee's Personnel File.

See Appendix for supporting documentation

STAFF REQUIREMENTS RELATED TO §3800 REGULATIONS – Pages 50-52

STUDENT'S RIGHTS – Pages 54-58

#8 The Glen Mills Schools has a written policy regarding medical and dental treatment. The policy is contained in **STUDENT'S RIGHTS**; a written document describing Specific Rights listed in §3800.23. That policy assures that every student shall have the appropriate medical, behavioral health and dental treatment. Glen Mills will continue to provide all youth that request care and all youth whose condition indicates the need for such care. Medical and/or dental evaluation and treatment is provided as prescribed in accordance with §3800.141-146. The **STUDENT'S RIGHTS** document has been furnished to all current students and is furnished to all new students and their parents on or before arrival.

See Appendix for supporting documentation

STUDENT'S RIGHTS – Pages 54-58

#9 The Glen Mills Schools has a **Restrictive Procedures Plan** in accordance with §3800.202-213, which addresses physical contact. **STUDENT'S RIGHTS** assures a child's right to be free from harassment. A staff member shall not use verbal interaction with students to harass (annoy persistently, pester, aggravate and/or persecute) students, nor shall it be used to degrade, humiliate, insult or ridicule a student.

To date 427 staff members, including all direct care workers, have completed training regarding **STUDENT'S RIGHTS** and have acknowledged by their signature their understanding and responsibilities related to this policy. These signed acknowledgments are filed in each employee's Personnel File.

Please note that a child's right to be free from harassment is also addressed during **Behavioral Intervention Training** and **Restrictive Procedures Training.**

See Appendix for supporting documentation

THE GLEN MILLS SCHOOLS' BEHAVIORAL INTERVENTION AND RESTRICTIVE PROCEDURES STAFF TRAINING PLAN AND CURRICULUM with Quiz – Pages 30-49

STAFF REQUIREMENTS RELATED TO §3800 REGULATIONS – Pages 50-52

STUDENT'S RIGHTS – Pages 54-58

#10 The Glen Mills Schools incorporates its responses to items #2, #4, #5, #7, #8 and #9, which precede, as full response to this citation.

#11 As stated in response #1, the Glen Mills Schools reaffirms its position that it will provide full access to its students, its campus and information regarding students to representatives of the Department of Public Welfare and its authorized agents.

As stated in response #3, the Glen Mills Schools shall prepare and submit a plan of supervision, for staff members, regarding all allegations of child abuse within 24 hours of oral notification to the facility that a report has been received for investigation by DPW; based on information supplied by DPW, plans of supervision will be individually prepared, submitted and followed as accepted.

#12 In response the Glen Mills Schools has prepared and attached, as part of this response, a staffing diagram showing staffing during awake hours. which indicates compliance to the required 8:1 ratio.

The Glen Mills Schools acknowledges its need to hire additional staff members during non-awake hours. The Glen Mills Schools recommends and respectfully requests that a "phase-in" period of 18 to 24 months be permitted for hiring due to financial constraints and the fact that the Schools has a current licensed capacity of 950, however, its present population is less than 775; significantly below the licensed capacity.

We have initiated the hiring process of these currently needed additional staff and shall utilize the following steps:

- Newspaper Advertising
- Review of Applications on File
- Registering for Job Fairs
- College and University Recruitment

The Glen Mills Schools shall hire no less than two additional overnight staff on or before October 4, 2000. The hiring process will continue during the "phase-in" period as it relates to the Schools' population.

See Appendix for supporting documentation

GLEN MILLS 3800 STAFFING REQUIREMENTS DIRECT CARE AND SUPERVISION (Staffing Chart) – Pages 72-76

#13 Effective immediately the Glen Mills Schools will implement the following policy in accordance with the requirements of §3800.147:

> Student Use Of Tobacco Products: Students, including those who are 18 years of age and older, are prohibited from using any tobacco products on the grounds of the Glen Mills Schools or while being transported by the Glen Mills Schools. All tobacco products including cigarettes, smokeless tobacco products, cigars etc. are prohibited.

#14 Curriculums for **Behavioral Intervention Training** and **Restrictive Procedures Training**, in accordance with §3800.202-213, have been developed and are currently utilized in conducting all staff training. Glen Mills Schools no longer uses the term "touch for attention". This is supported in the **Behavioral Intervention Training** and **Restrictive Procedures Training** curriculums.

Since July 12, 2000, 15 staff training seminars have been conducted regarding **Behavioral Intervention** and **Restrictive Procedures** with 262 staff retrained. In addition there are seven more training seminars scheduled during the month of August, 2000. It is conservatively estimated that upon completion of this series of scheduled sessions that over 400 staff members will have completed their retraining. Training and retraining will be ongoing.

See Appendix for supporting documentation

THE GLEN MILLS SCHOOLS' BEHAVIORAL INTERVENTION AND RESTRICTIVE PROCEDURES STAFF TRAINING PLAN AND CURRICULUM
with Quiz – Pages 30-49

#15 The Glen Mills Schools acknowledges that DPW is the sole civil (i.e., governmental) agency responsible for the investigation of allegations of abuse at Glen Mills. Glen Mills Schools also recognizes its own responsibility as a licensed agency to provide a safe environment for its students. In order to accomplish these objectives the Glen Mills Schools shall not question alleged student victims of abuse about specific abuse allegation until after DPW completes its investigation, unless the student's committing jurisdiction requires otherwise.

To insure that all staff members are informed of this provision of the Child Protective Service Law it has been incorporated into the **Behavioral Intervention Training** and **Restrictive Procedures Training.**

See Appendix for supporting documentation

THE GLEN MILLS SCHOOLS' BEHAVIORAL INTERVENTION AND RESTRICTIVE PROCEDURES STAFF TRAINING PLAN AND CURRICULUM
with Quiz – Pages 30-49

APPENDIX

THE GLEN MILLS SCHOOLS' BEHAVIORAL INTERVENTION AND RESTRICTIVE PROCEDURES STAFF TRAINING PLAN AND CURRICULUM

The Schools' Behavioral Intervention Plan/Emergency Intervention Plan is to be taught independently or during *Normative Systems Training.* This plan and subsequent training only addresses staff behavioral intervention not student involvement.

Requirements:

All staff must demonstrate competency in Behavioral Intervention and Restrictive Procedures by passing a written test and through "hands-on" competency of physical techniques by the demonstration of use of specific procedures. Upon successful completion staff will sign off on their individual training profile under Normative Systems Training and their Behavioral Intervention Training Profile. Only certified trainers are permitted to conduct this training and assess staff competency.

In order to properly teach the Schools' Behavioral Intervention Program the trainer must adequately address several areas. Those areas include the philosophy of the program, how to properly administer the techniques and what is not acceptable or considered abusive according to the Program.

Before staff can begin to utilize the Behavioral Intervention Program it is necessary for them to fully understand the philosophy of the program.

All trainers need to understand that like most outside agencies and systems new staff need to be exposed to the fact that the Behavioral Intervention techniques are not a disciplinary system. The primary purpose of the techniques is to "change negative behavior to positive behavior," while protecting students, staff and the school. The student determines, through his behavior, if a Behavioral Intervention begins and when it ends. Once a student changes his negative behavior the Behavioral Intervention ends. As a result an intervention is designed to help not hurt. The primary purpose of the program is to address specific student behavior not personality.

Now that the basics regarding Behavioral Intervention have been addressed the trainer can address more specific points regarding the program before reviewing each de-escalating technique. The trainer should address the following points:

1. There are five de-escalation techniques. If the behavior you address does not change from negative to positive you escalate the technique in a further attempt to terminate the intervention by controlling behavior and protecting students and staff.

2. When addressing student behavior, use the least amount of intervention necessary to gain the desired response. All attempts should be made to terminate the intervention at the lowest level possible.

3. You are more likely to receive a positive response to an intervention if you address the behavior the way you would like to be addressed.

4. The behavior will determine the appropriate initial level of intervention. Example: You would not use friendly/non-verbal technique where two students are arguing. A friendly or concern verbal may be a more appropriate technique to commence intervention.

Following these points the trainers will have participants read each of the De-escalation Techniques out loud and answer any questions from the participants. In addition, the trainer should make the following points after each specific level.

De-escalation Technique Number 1 (Friendly Non-Verbal)

After participants read this level out loud the trainer should give several examples of a friendly non-verbal. In addition, the trainer should have participants give examples of friendly non-verbals.

De-escalation Technique Number 2 (Concern Non-Verbal)

As in Level 1 the trainer should give examples and have participants give examples.

De-escalation Technique Number 3 (Helpful Non-Verbal)

As in Level 1 the trainer should give examples and have participants give examples.

De-escalation Technique Number 4 (Concern Verbal)

As in Level 1 the trainer should give examples and have participants give examples.

De-escalation Technique Number 5 (Staff Support)

As in Level 1 the trainer should give examples and have participants give examples.

•••

In addition the following points of interest must be addressed:

1) Students are not a part of Staff Behavior Management and are only permitted to address other students through non-verbal and verbal techniques. Although students are encouraged to confront negative behavior, such confrontations between students must never become physical.

2) All staff must support any interventions they observe.

3.) When offering support to an intervention where you are not the primary intervener you have several obligations and responsibilities. They are as follows:

a) To offer non-verbal and verbal support.
b) To observe the response of the student being addressed.
c) To observe the response of other students in the area.
d) To ensure that the intervening staff has, in your professional opinion, full control of their emotions and actions. If you feel they do not it is your responsibility to take over the intervention as the primary intervener before there is a problem.
e) Since the student's behavior has allowed the intervention to escalate to Technique Number 5 you must assume that there is a possibility that the student may end up losing control and become a threat to himself and others resulting in a physical restraint. As a result, supporting staff should start to prepare the environment for a possible restraint. Any sharp objects should be removed. The addressed student(s) should not be near glass, furniture or anything that could cause injury to a student or staff.
f) Supporting staff may need to recruit other staff if it is deemed necessary to ensure a safe environment.

MANUAL ASSIST

Following the five de-escalation techniques the trainer will train participants in manual assist.

In the event that the first five de-escalation techniques fail in motivating the student to change their behavior from negative to positive a manual assist may be used. The sole purpose of the manual assist is to provide the student with a final attempt to gain self-control. The manual assist shall be conducted by staff placing their hands on the student's arm or shoulder area only and shall not exceed one minute. The purpose for this is to communicate to the student that their behavior is becoming a major concern to staff. The student's response will determine if the intervention will be de-escalated or if a restrictive procedure is necessary. If at any time during the manual assist the student becomes a threat to injure himself and/or others, a restrictive procedure will be utilized.

The trainer will demonstrate all the unacceptable methods for manual assist as listed below:

- grasping of the neck
- slapping the chest/face, head, neck or any part of the body
- pinching or punching any area
- grabbing of the neck, face
- grabbing shirt area around the chest

The trainer will then demonstrate the acceptable methods for manual assist as listed below:

- hands placed on student's arms
- hands placed on student's shoulders

The trainer will emphasize that the manual assist may not exceed one minute.

The manual assist technique is utilized after previous de-escalation techniques have failed to motivate a student to change his behavior from inappropriate to appropriate. The sole purpose of the manual assist is to provide the student with a final attempt to gain self-control.

If at this point the staff discerns that the student involved with a manual assist gains self-control, de-escalation techniques are then utilized.

However, if the student does not gain self-control and becomes a threat to injure himself or others, a physical restraint is utilized.

At this point the trainer will share to the participants the following list of items that indicate that a student has become a threat to injure himself and or others:

- physically attacking a person
- punching, kicking, choking, slapping, biting, spitting, or pinching
- the destruction of property that could result in the injury of others
- prior behavior in conjunction with non-verbal actions such as swinging arms and fists, balling up fists to prepare to strike another person
- prior behavior in conjunction with verbal threats such as "I'm gonna kill you"
- non-verbal threats in conjunction with verbal threats such as balling up fists while verbally threatening another person

At this time the trainer will have participants experience and demonstrate both unacceptable and acceptable methods of performing a manual assist.

RESTRICTIVE PROCEDURES
PHYSICAL RESTRAINT

Following the review of the de-escalation techniques and manual assist the trainer must address the following points of interest. Restrictive procedures are commonly defined by outside agencies as use of manual restraints, chemical restraints, and exclusion. The trainer must reinforce that chemical restraints and exclusion are strictly prohibited by the Schools.

At this time it is imperative that the trainer demonstrates the specific techniques allowed and prohibited during a physical restraint. In addition, participants will be asked to both experience and demonstrate these specific techniques. While demonstrating these techniques the trainer should also differentiate the restraints of different sized students. To be more specific, you would not restrain a 5'2", 150 lb., 15-year-old student the same way as you would a 6'4" 265 lb., 17 year-old student. For example, to ensure safety more staff may be required to apply a restraint on a larger, more aggressive student.

In addition, the following points of interest must be addressed by the trainers.

1) The Glen Mills Schools does not use or allow the following behavioral interventions/emergency interventions:

- Seclusion defined as placing a child in a locked room. A locked room includes a room with any type of door locking device, such as a key lock, spring lock, bolt lock, foot pressure lock of physically holding the door shut.
- Adverse Conditioning the use of aversive conditioning, defined as the application of startling, painful or noxious stimuli, body shaking, water spray, slapping, pinching, ammonia vapors, sensory deprivation and electric shock.
- Pressure Points the application of pain through pressure point techniques or pain compliance.
- Intentionally producing pain to limit the child's movement, including but not limited to arm twisting, finger bending, joint extensions, headlocks, punching, kicking or slapping.
- Chemical Restraint A chemical restraint is a drug used to control acute, episodic behavior that restricts the movement or function of a child.
- Breathing or circulation restriction i.e., The Basket technique or Mandt technique.
- Corporal Punishment
- Body Wraps with sheets or blankets, placing blankets, pillows, clothing or other items over the child's head or face.
- Any technique that can reasonably be expected to cause serious injury to a child that would require medical treatment provided by a health practitioner.

- Mechanical Restraint is a device that restricts the movement or function of a child or portion of a child's body. Examples of mechanical restraints include handcuffs, anklets, wristlets, camisoles, helmets with fasteners, muffs and mitts with fasteners, poseys, waist straps, head straps, restraining sheets and similar devices.
- Exclusion is the removal of a child from the child's immediate environment and restricting the child alone to a room or area.

2) Now that staff are aware of what is **not** acceptable when utilizing a restrictive procedure the trainer will address the acceptable techniques and give examples and hands-on experience to the participants.

PHYSICAL RESTRAINT

As a trainer you must demonstrate and have participants demonstrate all techniques.

Classification: Manual restraint – a physical hands-on technique that lasts more than one minute which restricts the movement or function of a student or portion of a student's body.

Description: After all other levels of intervention have failed to de-escalate the behavior, becomes a threat to injury himself and/or others, it is the responsibility of the staff involved to hold the young man until he appears to settle down. Staff will use the least amount of physical restraint as possible until the student is no longer posing threat to himself or others. At this time, staff will take this opportunity to talk to the student and use the incident to help the student mature and grow.

The following physical restraints are utilized when the student's behavior threatens injury/harm to himself or others:

Definitions:

- Upper limb(s) – arm(s) and adjoining shoulder area
- Lower limb(s)-leg(s)
- Partial limb restraint – restraint of upper limb(s) or restraint of lower limb(s)
- Full limb restraint – simultaneous restraint of upper limb(s) and lower limb(s)

A. **Free Standing Restraint:**

Please Note: partial limb restraint techniques are appropriate when utilizing Free Standing Restraint.

Technique – Upper limb restraint:

- Student is immobilized by trained staff member(s) with a firm grasp of his upper limb(s) accompanied by verbalization to cease his actions.
- Student is immobilized by trained staff member(s) placing hands on upper limb(s).
- Student's actions are checked/stopped by trained staff member(s) wrapping/clasping his upper limb(s).

This technique is more age and weight appropriate for smaller, younger students. Trainer must reaffirm that, as with all techniques utilized by the school, pressure or weight on the student's respiratory system is prohibited.

Student Health Risks – minimal/possible risk to soft tissue areas at wrist, elbow or shoulder.

B. Wall Restraint:

Please Note: Staff shall be cognizant of the physical environment with regards to safety. The use of a wall enables staff member(s) to facilitate an upper limb restraint in a safe and effective manner. When utilizing a wall as a stabilizing mechanism the student's back shall be supported by the wall with his front facing outward and his posture shall remain erect.

Technique – Upper limb restraint

- Trainer will reaffirm that pressure or weight on the student's respiratory system is prohibited.
- Using the support of an available wall a student is immobilized by trained staff member(s) with a firm grasp of his upper limb(s) accompanied by verbalization to cease his actions.
- Using the support of an available wall a student is immobilized by trained staff member (s) placing hands on upper limb(s).
- Using the support of an available wall a student's actions are checked/stopped by trained staff member(s) wrapping/clasping his upper limb(s).

This technique is more age/weight appropriate for larger, stronger students who are harder to protect from injuring self or others.

Student Health Risk: Moderate possible risk to soft tissue areas at wrist, elbow or shoulder, possible risks of injury related to the wall.

C. Prone Restraint:

Please Note: Prone restraint occurs when a student initiates action that necessitates, for the sake of his safety and/or the safety of others, placement in a supine (face-up) position not the ventral position. Note: Trainer must strongly address that all prone restraints must be face up in order to prevent compressional asphyxiation. Trainer will refer to the hand out, which refers to the Florida incident, to stress the importance of the supine position. In addition, the trainer must share that traditionally, by definition, prone restraints are ventral because many students bite or spit at staff, however the likelihood of injury is significantly greater with ventral prone restraints.

Technique – Full limb restraint

Student is lowered to a supine position by full limb restraint; the simultaneous restraint of upper limb(s) and lower limb(s). While continuing to apply upper limb restraint techniques in conjunction with lower limb restraint techniques staff member(s) assure the safe placement of the student on the floor in the supine position.

The supine position is accomplished by the application of the staff member(s) body weight being safely and evenly distributed upon the upper and lower limb(s) of the student.

Trainer will reaffirm that pressure or weight on the student's respiratory system is prohibited.

Student Health Risks (Moderate): Possible risk to soft tissue areas on arms and legs. Possible risk of injury when student is lowered to the floor.

D. Applicable for All Restrictive Procedure Techniques:

Duration: Student response determines the termination of behavioral intervention/emergency intervention involving manual restraint as above defined. The amount of time of an intervention involving manual restraint, is limited to the amount of time a student is in danger of injuring/presenting an immediate danger to himself or others. Behavioral intervention/emergency intervention involving manual restraint shall not exceed 10 minutes.

Expected Outcome: Student is immediately responsive and regains desired self-control.

When Techniques Are NOT Used:

When the student's behavior does not threaten injury/harm to himself or others.

The following points must be addressed regarding all restraints:

1. The only acceptable reason for restraining a student is when that student has become a threat to harm themselves or others. A restrictive procedure may not be used in a punitive manner for the convenience of staff or as a program substitution.

2. Your primary objectives when restraining a student are safety and control.

3. You should never restrain a student by yourself, if at all possible, because there is a greater possibility of someone getting hurt.

4. All restraining or supporting staff have the responsibility of immediately reporting any physical injury of staff or students as a result of physical restraint. It is also the responsibility of supporting staff to ensure that proper medical care is received through the Glen Mills Health Center or local hospital.

5. Following an incident, a senior manager will conduct an investigation of the incident to assess that it was properly handled. In addition, all involved staff will be interviewed and requested to generate a report of the incident.

6. Staff need to be aware of the following regarding 3800.211, Manual Restraints:

   - A manual restraint is a physical hands-on technique that lasts more than 1 minute that restricts the movement or function of a child or portion of a child's body.

   - The position of the manual restraint or the staff person applying a manual restraint should be changed at least every 10-consecutive minutes of applying the manual restraint. Changes in application of the restraint every ten minutes includes either different staff persons applying the technique or changing the type of technique.

   - A staff person who is not applying the restraint shall observe and document the physical and emotional condition of the child, at least every 10 minutes the manual restraint is applied.

7. The trainer must inform staff of the Pennsylvania's Child Protective Services Law 23 Pa. C.S.A. 6311 Required Reporters of child abuse.

6311. Persons required to report suspected child abuse

a.) **General rule** - Persons who in the course of their employment, occupation or practice of their profession, come into contact with children shall report or cause a report to be made in accordance with section 6313 (relating to reporting procedure) when they have reasonable cause to suspect, on basis of

their medical, professional or other training and experience, that a child coming before them in their professional or official capacity is an abused child.

b.) **Staff members of institutions, etc.** - Whenever a person is required to report under subsection (b) in the capacity as a member of the staff of a medical or other public or private institution, school, facility or agency, that person shall immediately notify the person in charge of the institution, school, facility or agency or the designated agent of the person in charge. Upon notification, the person in charge or the designated agent, if any, shall assume the responsibility and have the legal obligation to report or cause a report to be made in accordance with section 6313. This chapter does not require more than one report from any such institution, school, facility or agency.

MUST SHARE THE CHILD HOTLINE #: 1-800-932-0313

To properly provide staff with the necessary data to fulfill their requirements the following must be addressed:

I. PURPOSES:

1. Identification of abuse
2. protection of abused children
3. prevention of recurrence
4. rehabilitation of abusers

II. ABUSE INVESTIGATION CHECK LIST - ALWAYS DETERMINE:

1. Nature of Injury:
   _____ Physical
   _____ Imminent Risk of Physical
   _____ Mental
   _____ Sexual
   _____ Serious Neglect

2. Cause of Injury:
   _____ Accident
   _____ Non-Accident
   _____ Unknown

3. Who Caused Injury:
   _____ Parent
   _____ Person responsible for welfare
   _____ Paramour
   _____ Person residing with child
   _____ Other
   _____ Unknown – ask: was child in care of parents at time of injury?

III. DEFINITIONS:

A. Child Abuse - includes the following 5 categories:

1. Physical - Any recent act or failure to act by a perpetrator which causes non-accidental SERIOUS PHYSICAL INJURY to a child under 18 years of age.

   "Serious physical injury." An injury that:

   - causes a child severe pain; or
   - significantly impairs a child's physical functioning, either temporarily or permanently.

2. Risk - Any recent act or failure to act or series of such acts or failures to act by a perpetrator which creates and IMMINENT RISK of serious physical injury to a child under 18 years of age.

3. Mental - An act or failure to act by a perpetrator which causes non-accidental SERIOUS MENTAL INJURY to a child under 18 years of age.

   "Serious mental injury." A psychological condition, as diagnosed by a physician or licensed psychologist, including the refusal of appropriate treatment, that:

   > "renders a child chronically and severely anxious, agitated, depressed, socially withdrawn, psychotic or in reasonable fear that the child's life or safety is threatened, or seriously interferes with a child's ability to accomplish age-appropriate developmental and social tasks."

4. Neglect - SERIOUS PHYSICAL NEGLECT by a perpetrator constituting prolonged or repeated lack of supervision or the failure to provide essentials of life including adequate medical care, which endangers a child's life or development, or impairs the child's functioning.

   The trainer shall refer to suicide prevention/recognition training as another vehicle utilized to protect students under CPSL.

For the most part, these definitions quote directly from the laws. However, in a few instances the definitions have been translated for improved grammar or clarity of meaning.

5. Sexual – Any act or failure to act by a perpetrator which causes SEXUAL ABUSE or sexual exploitation of a child under 18 years of age. ALSO: Any recent act or failure to act which creates an IMMINENT RISK of sexual abuse or sexual exploitation to a child under 18 years of age.

   "Sexual abuse or exploitation." The employment, use, persuasion, inducement, enticement, or coercion of any child to engage in or assist any other person to engage in any sexually explicit conduct, or any simulation of any sexually explicit conduct, for the purpose of producing any visual depiction, including photographing, videotaping, computer depicting or filming of any sexually explicit conduct, or the rape, aggravated indecent assault, indecent exposure, molestation, incest, prostitution or other form of sexual exploitation of children. Also, any of the following when committed by a perpetrator:

   - Statutory Sexual Assault – Sexual intercourse with a child who is less than 16 years of age by a person who is 4 or more years older and they are not married.

   - Involuntary or voluntary deviant sexual intercourse – Intercourse by mouth or rectum or with an animal or with a foreign object.

     Involuntary Includes:

     a. impairing a child by use of drugs or alcohol, without their knowledge, for the purpose of preventing resistance;
     b. engaging in conduct with a child who suffers from a mental disability which renders him or her incapable of consent;
     c. engaging in conduct with a child under the age of 13,
     d. Conduct between a child under the age of 16 and a person who is 4 or more years older.

   - Sexual Assault – Sexual involvement between a perpetrator and child, including the touching or exposing of the sexual or other intimate parts of the body, for the purpose of arousing or gratifying sexual desire in either the adult or child without the child's consent.

   - Incest – Sexual intercourse with an ancestor or descendant-by blood or adoption-brother or sister of the whole or half-blood, or an uncle, aunt, nephew or niece of the whole blood.

   - Promoting Prostitution – Inducing or encouraging a child to engage in prostitution.

   - Rape – Sexual intercourse by force or compulsion.

- Engaging children in Pornography - including any of the following:

  a. the obscene photographing, filming or depiction of children for commercial purposes.
  b. the obscene photographing, depiction, or filming of children or the showing of obscene films or photographs to arouse or gratify sexual desire in either the adults or children involved.

B. Recent acts or omissions - Acts or omissions committed within two years of the date of the report to the Department of Public Welfare or county agency.

C. Perpetrator - A person who has committed child abuse and is a parent of a child, a person responsible for the welfare of a child, an individual residing in the same home as a child or a paramour of a child's parent.

D. Mandated Reporter - A person who, in the course of their employment, occupation or practice of their profession comes into contact with children and has REASONABLE CAUSE TO SUSPECT, on the basis of their medical, professional, or other training and experience, that a child coming before them in their professional or official capacity is a victim of child abuse. Persons required to report include, but are not limited to, a licensed physician, medical examiner, coroner, funeral director, dentist, osteopath, chiropractor, clergy, psychologist, podiatrist, intern, registered nurse, licensed practical nurse; hospital personnel engaged in the admission, examination, care or treatment of persons; a Christian Science practitioner, school administrator, school teacher, school nurse, social services worker, day care center worker or another child care or foster care worker, mental health professional, peace office, or law enforcement official.

E. Indicated Report - A child abuse report made pursuant to this chapter if an investigation by the county agency determines that substantial evidence (evidence which outweighs inconsistent evidence and which a reasonable person would accept as adequate to support a conclusion) of the alleged abuse exists based on any of the following:

  a. Available medical evidence.
  b. The child protective service investigation.
  c. An admission of the acts or abuse by the perpetrator.

F. School Employees - An individual employed by a public or private school, intermediate unit or area vocational and technical school. The term includes an independent contractor and employees. The term excludes an individual who has no direct contact with students.

G. Indicated Report for School Employees - A report made relating to students in public and private schools if an investigation by the county agency determines that substantial evidence of serious bodily injury or sexual abuse or sexual exploitation exists based on any of the following:

a. Available medical evidence.
b. The child protective service investigation.
c. An admission of the acts or abuse by the perpetrator.

H. Serious bodily injury - Bodily injury that creates a substantial risk of death or which causes serious permanent disfigurement or protracted loss or impairment of function of any bodily member or organ.

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After staff has been provided with this knowledge the trainer will give examples to ensure understanding and will stress to staff to **QUESTION** and **DOCUMENT** everything as a means to establish "reason to suspect" or not suspect child abuse.

In addition, staff must understand that they can not question alleged student victims of abuse about specific abuse allegations until after the Pennsylvania Department of Welfare interviews them.

a. The Trainer must share with the staff that any staff that does not follow the Behavioral Intervention Techniques and/or Restrictive Procedures in accordance with the training will be disciplined in some manner which may be, but not limited to verbal reprimand, written reprimand, suspension with pay, suspension without pay, or termination. The disciplinary method utilized will be in accordance with the severity of the offense.

b. Following a restraint the unit Senior Counselor will contact the student's parents and committing agency, probation officer, and/or worker, regarding the incident within one business day.

Once all the participants have gained a comprehensive understanding of the Schools' Restrictive Procedures the trainer will proceed to address the Schools' Re-integration/neutralization process.

REINTEGRATION/NEUTRALIZATION PROCESS

The basic purpose of the reintegration/neutralization process is to help students learn and grow from their behavioral incidents. Most of our students went through life intimidating others to the point where authority figures were afraid to address them. When they did address their behavior our students usually refused to accept the intervention. Since we do not accept that at Glen Mills, it is imperative that after a restrictive procedure, our neutralization/re-integration process becomes a learning process. Because of our students' background and experience, students often develop certain feelings after a restraint. Those feelings include the following:

- Denial-a refusal to comply with a request. a refusal to acknowledge the truth of a statement. Syn. disavowal. rejection
- Anger-a feeling of displeasure or hostility. Syn. wrath, indignation, incensed. infuriated.
- Resentment-a feeling of anger or indignance about. To object to. Syn. bitterness
- Remorse-deep moral anguish and regret for misdeeds. Syn. regretful
- Sorrow-mental suffering. anguish, a cause of grief or sadness. Syn. lament. distressed
- Revenge-to impose insult or injury or inflict injury for an injury or insult. Syn. retaliation. reprisal.
- Reprisal-an attack or other action intended to inflict injury for an injury suffered.
- Embarrassment-feeling of self-consciousness. or ill at ease. Syn. disconcerted. mortified. abashed. chagrin.
- Bewildered-befuddled. confused with conflicting thoughts or ideas. Syn. confused. unclear in one's mind.

Because feelings cannot be monitored or validated. your job as a trainer is to first prove to the participants that the best way to effect feelings and personality is to address behavior. Dealing with behavior effects feelings/personality change not the opposite.

Once the basic philosophy of this process is understood by participants the trainer will teach and give examples of all 4 steps of the neutralization process.

Step 1.) ENSURE SAFETY AND CONTROL

Neutralizing staff will observe the student's response. When the student's behavior indicates control they will advance to step 2.

Step 2.) NEUTRALIZING STAFF WILL ADDRESS THE STUDENT AND THEIR BEHAVIOR

Initially staff must address the student's behavior that led to the intervention not the student's personality. Addressing behavior is the tool utilized to help students with their feelings. Neutralizing staff should share to the student specific behaviors that the student acted out to cause an unsafe situation. The purpose of this is to have the student gain an understanding of what their behavior really was. A student who finally accepts that he indeed did throw a chair at a staff member is more likely to

effectively deal with his anger toward staff than trying to just address a feeling of anger. Remember feelings cannot be monitored, behavior can. During this step staff should observe the student's response. When it is positive, staff should move on to step 3.

Step 3.) THE STUDENT ADDRESSES THEIR OWN BEHAVIOR

During this step staff should have the student talk about their own behavior. As students become able to verbalize their actions it helps them realize their mistakes. Questions that can be asked to help with these steps are as follows:

a. What did you do to make this situation unsafe?
b. Did you accept the initial intervention?
c. How did you act when your behavior was addressed?

Neutralizing staff should observe the student's response to those questions to ensure that the student is indeed addressing their behavior. Quite often students are looking to project blame on someone else for their behavior. When the student's response is positive the neutralization process can advance to Step 4. A positive response is also a sign that the student has successfully dealt with their feelings.

Step 4.) STUDENT BEGINS FORMAL PROCESSES

During this step students enter two formal processes. One with peer group and one with staff.

The process with their peer group evolves around having the student receive feedback based on their behavior during Guided Group Interaction and Townhouse. Students should not only address the negative behaviors of the particular student, but also offer alternatives for that behavior.

During the staff formal process the student will meet with his unit staff, Counselor, Senior Counselor, Team Leader, Group Living Director and possibly the Executive Director. During this step staff start to lay the incident to rest by talking positively about the future. Staff will talk to the student about how they know that the student can behave much more pro-socially because they have in the past. There must be a light at the end of the tunnel for the confronted student. Staff will also ask the student what they learned from the incident. In addition, the staff formal process allows the student to share to one of a number of staff if they felt like they were mistreated in any way.

Once the formal processes have successfully been completed the neutralization/re-integration process is terminated.

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After the neutralization/re-integration process is understood by the participants the trainer should address these specific points of interest.

1. During the initial steps of the neutralization process it is better if the restraining staff do not participate in this. Quite often the student may possess feelings with the restraining staff as they attempt to project blame.

2. Have as many staff as possible involved in the neutralization re-integration process. The more staff the better.

3. The neutralization/re-integration process can take 2 hours, 2 days or even 2 weeks, depending upon the students.

4. Signs that a student may be neutralized are as follows:

   a. They take ownership over their behavior.

   b. They apologize for their behavior.

   c. They may cry.

   d. They will want to talk and process with the restraining staff. When they pursue this process it is a sign that not only has the student's dealt with their feelings but is also concerned with staff feelings. This is extremely positive.

      Quite often when students have been neutralized they will ask if the restraining staff is mad or angry with them. They will inquire if restraining staff will talk to them. If and when this happens it is <u>important</u> that the student talk to the staff and that the staff communicate with the student in an adult to adult manner. Once again, these staff should emulate a positive feeling and address behavior not personality. Staff should also focus on the future.

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If following a restraint and neutralization/re-integration process there is a need to discipline a student, staff must be trained to understand their responsibilities under Pennsylvania's Title 55 Chapter 3680 particularly 3680.43 "agency discipline" emphasizing the following:

3680.43

1. 3680.43 prohibits physical punishment inflected upon the body

2. 3680.43 prohibits the denial of food, water, shelter, sufficient sleep, clothing or bedding.

In order to conclude this section of the training the trainer should share with the participants that the Schools' Behavioral Intervention Program and Restrictive Procedures are designed to protect students, staff and the school.

SCORE:_____

NAME:_____ DATE:_____

BEHAVIORAL INTERVENTION/RESTRICTIVE PROCEDURES QUIZ

1.) The primary purpose of the schools' Behavioral Intervention Program is:
a.) to change behavior
b.) to change personality
c.) to counsel
d.) to discipline

2.) Ultimately, who determines if an Intervention begins and when it ends?
a.) the student
b.) the staff
c.) policy
d.) administration

3.) Which of the following does Glen Mills NOT allow when addressing student behavior?
a.) verbal ridicule
b.) poking and slapping
c.) kicking and choking
d.) All of the above

4.) Glen Mills prone restraint technique must always be:
a.) face up
b.) face down
c.) standing
d.) None of the above

5.) The only acceptable reason for physically restraining a student is:
a.) he is being negative
b.) he is a threat to himself or others
c.) he is on concern
d.) None of the above

6.) Which of the following is not used by the school?
a.) Behavioral Intervention techniques
b.) Restrictive Procedures
c.) Manual Restraints
d.) Mechanical Restraints (ie. Handcuffs)

7.) Which of the following is an acceptable Restrictive Procedure technique?
a.) corporal punishment
b.) pressure points
c.) breathing or circulation restriction
d.) None of the above

8.) What determines the appropriate initial level of an Intervention?
a.) the behavior
b.) the staff
c.) policy
d.) the student

9.) When physically restraining a student your primary objectives are:
a.) punishment and immobilization
b.) discipline
c.) safety and control
d.) All of the above

10.) Which of the following are not acceptable when physically restraining a student?
a.) punching
b.) kicking
c.) slapping
d.) All of the above

11.) Which of the following is not a physical restraint technique used by the school?
a.) free standing restraint
b.) wall restraint
c.) prone restraint
d.) basket restraint

12.) The only physical restraint technique that allows full limb restraint is:
a.) free standing restraint
b.) wall restraint
c.) prone restraint
d.) basket restraint

13.) Which of the following is not a step of our neutralization process?
a.) ensure safety and control
b.) neutralizing staff address the student and their behavior
c.) the student addresses their behavior
d.) the student begins formal processes
e.) None of the above

14.) Which of the following is a sign that a student may be neutralized?
a.) they take ownership over their behavior
b.) they apologize for their behavior
c.) they may cry
d.) they may want to talk and process with the restraining staff
e.) All of the above

15.) If used properly the Behavioral Intervention and Restrictive Procedures program will protect:
a.) students
b.) staff
c.) the school
d.) All of the above

Name:_____ Unit:_____
(Print)

STAFF REQUIREMENTS RELATED TO 3800 REGULATIONS

3800.31

1. Please consider the following as formal notice of the procedures to be followed when a grievance or complaint is made by a student as set forth in the Glen Mills Schools Policy For Processing Concerns and Grievances handout.

2. Please consider this as a formal notice that there can be no retaliation of any kind against any youth who files a grievance or complaint. In addition, any staff found to be violating this policy will be disciplined in some manner which may be but not limited to verbal reprimand, written reprimand, suspension with pay, suspension without pay or termination. The disciplinary method utilized will be in accordance with the severity of the offense.

3800.32(g)

3. Please consider this as formal notification that all staff is prohibited from reviewing outgoing mail except when ordered by the court with jurisdiction over youth.

3800.51

4. Please consider this as additional notification of your responsibilities as a required reporter of child abuse.

23 Pa. C.S.A. 6311. Persons required to report suspected child abuse

(a) **General rule.** – Persons who in the course of their employment, occupation or practice of their profession, come into contact with children shall report or cause a report to be made in accordance with section 6313 (relating to reporting procedure) when they have reasonable cause to suspect, on basis of their medical, professional or other training and experience, that a child coming before them in their professional or official capacity is an abused child.

(c) Staff members of institutions, etc.—Whenever a person is required to report under subsection (b) in the capacity as a member of the staff of a medical or other public or private institution, school, facility or agency, that person shall immediately notify the person in charge of the institution, school, facility or agency or the designated agent of the person in charge. Upon notification, the person in charge or the designated agent, if any, shall assume the responsibility and have the legal obligation to report or cause a report to be made in accordance with section 6313. This chapter does not require more than one report from any such institution, school, facility or agency.

Childline Phone #1-800-932-0313

In addition, this is also formal notification that any staff who addresses student behavior not in accordance with the schools' Behavioral Intervention/Restrictive Procedures Plan will be disciplined relative to the serverity of the offense.

1. As an employee of the Glen Mills Schools you have the responsibility to ensure and protect all student rights.

3800.32. Specific Rights.

(a) A child may not be discriminated against because of race, color, religious, creed, disability, handicap, ancestry, sexual orientation, national origin, age or sex.

(b) A child may not be abused, mistreated, threatened, harassed or subject to corporal punishment.

(c) A child has the right to be treated with fairness, dignity and respect.

(d) A child has the right to be informed of the rules of the facility.

(e) A child has the right to communicate with others by telephone subject to reasonable facility policy and written instructions from the contracting agency or court, if applicable, regarding circumstances, frequency, time, payment and privacy.

(f) A child shall have the right to visit with family at least once every 2 weeks, at a time and location convenient for the family, the child and the facility, unless visits are restricted by court order. This right does not restrict more frequent family visits.

(g) A child has the right to receive and send mail.

(1) Outgoing mail may not be opened or read by staff persons.

(2) Incoming mail from Federal, State or county officials, or from the child's attorney, may not be opened or read by staff persons.

(3) Incoming mail from persons other than those specified in paragraph (2), may not be opened or read by staff persons unless there is reasonable suspicion that contraband, or other information or material that may jeopardize the child's health, safety or well-being, may be enclosed. If there is reasonable suspicion that contraband, or other information that may jeopardize the child's health or safety may be enclosed mail may be opened by the child in the presence of a staff person.

(a) A child has the right to communicate and visit privately with his attorney and clergy.
(b) A child has the right to be protected from unreasonable search and seizure. A facility may conduct search and seizure procedures, subject to reasonable facility policy.
(c) A child has the right to practice the religion or faith of choice, or not to practice any religion or faith.
(d) A child has the right to appropriate medical, behavioral health and dental treatment.
(e) A child has the right to rehabilitation and treatment.
(f) A child has the right to be free from excessive medication.
(g) A child may not be subjected to unusual or extreme methods of discipline which may cause psychological or physical harm to the child.
(h) A child has the right to clean, seasonal clothing that is age ad gender appropriate.

I hereby understand and agree to follow the aforementioned requirements related to Pennsylvania Department of Public Welfare 3800 regulations. In addition, I acknowledge receipt of all related handouts and materials as indicated above.

Signature _____ Date _____

Behavioral Intervention/Restrictive Procedures Training

Name:_____

Date:_____

Areas Covered

- De-escalation techniques
- Restraint techniques (free standing, wall and prone)
- Neutralization/re-integration techniques
- Required Reporting
- Grievance procedure
- Unacceptable restraint methods and techniques
- Documentation of restraints

1.) 23 Pa C.S.A. 6311. Persons required to report suspected child abuse

(a) General rule. – Persons who in the course of their employment, occupation or practice of their profession, come into contact with children shall report or cause a report to be made in accordance with section 6313 (relating to reporting procedure) when they have reasonable cause to suspect, on basis of their medical, professional or other training and experience, that a child coming before them in their professional or official capacity is an abused child.

(c) Staff members of institutions, etc.—Whenever a person is required to report under subsection (b) in the capacity as a member of the staff of a medical or other public or private institution, school, facility or agency, that person shall immediately notify the person in charge of the institution, school, facility or agency or the designated agent of the person in charge. Upon notification, the person in charge or the designated agent, if any, shall assume the responsibility and have the legal obligation to report or cause a report to be made in accordance with section 6313. This chapter does not require more than one report from any such institution, school, facility or agency.

Childline Phone #1-800-932-0313

1.) 3680.43 prohibits physical punishment inflicted upon body.
3680.43 prohibits the denial of food, water, shelter, sufficuent sleep, clothing or bedding.

Hours: Behavioral Intervention Program / Restrictive Procedures
Physical Restraints (1 ½ Hours)

Staff Signature:_____ Date:_____

I hereby acknowledge that the aforementioned staff member has successfully completed Behavioral Intervention/Restrictive Procedures Training as indicated by their competency with a written test and proper demonstration of hands on techniques.

Trainer Signature:_____ Date:_____

STUDENT'S RIGHTS

1. No student shall be discriminated against because of race, color, religious creed, disability, handicap, ancestry, sexual orientation, national origin, age or sex. §3800.32 (a)

2. No student shall be abused, mistreated, and threatened, harassed or subject to corporal punishment. §3800.32 (b)

3. Each student shall be treated with fairness, dignity and respect. §3800.32 (c)

4. Each student shall be informed of the norms (rules) of Glen Mills Schools. §3800.32 (d)

5. A student has the right to communicate with others by telephone subject to reasonable facility policy regarding circumstances, frequency, time, payment and privacy. Each student may privately communicate with others by use of telephones located in the Student Union. Private phone conversations to or from a Probation Officer, child's Attorney, clergy, parent(s)/guardian are consistent with the student's legitimate need for privacy and his right for confidentiality. §3800.32 (e)

6. A child shall have the right to visit with family at least once every 2 weeks, at a time and location convenient for the family, the child and the facility, unless visit are restricted by court order. This right does not restrict more frequent family visits. Each student may visit with his family on the grounds of the Glen Mills Schools at a mutually agreed upon convenient time. The scheduling of an appointment for visitation is recommended on the weekend days of Saturday & Sunday to insure the availability of the student. §3800.32 (f)

7. Each student may receive and send mail. There shall be no charge to the student to mail letters. §3800.32 (g)

8. Outgoing mail shall not be opened or read by staff persons except in the existence of a written court order so authorizing. §3800.32 (g1)

9. Incoming mail from Federal, State or county officials, or from the student's attorney, shall not be opened or read by staff persons. §3800.32 (g2)

10. Incoming mail from persons other than those specified above shall not be opened or read by staff persons. If there is reasonable suspicion that contraband or other information or material that may jeopardize the student's health, safety or well being, enclosed in the letter or package the letter/package shall be opened by the student in the presence of a staff person. §3800.32 (g3)

11. A child has the right to communicate and visit privately with his attorney and clergy. A student may communicate and visit privately with his attorney and clergy provided that the attorney and/or clergy furnish written verification of their relationship for the student's record. Visitation shall occur at a mutually agreed upon convenient time. §3800.32 (h)

12. A child has the right to be protected from unreasonable search and seizure. A facility may conduct search and seizure procedures, subject to reasonable facility policy. For the purpose of safety, upon arrival each student shall unpack his clothing and possessions in view of a staff person. Thereafter, a student shall only be searched if there is reasonable suspicion that he is in possession of contraband/weapons. §3800.32 (i)

13. A child has the right to practice the religion or faith of choice, or not to practice any religion or faith. A student may practice the religion or faith of his choice as long as the practice thereof does not infringe upon the rights of others. A student shall not be required to practice a religion or faith. §3800.32 (j)

14. A student shall have the right to appropriate medical, behavioral health and dental treatment. §3800.32 (k)

15. A student shall have the right to rehabilitation and treatment. §3800.32 (l)

16. A student shall have the right to be free from excessive medication. §3800.32 (m)

17. A student shall not be subjected to unusual or extreme methods of discipline, which may cause psychological or physical harm to the child. §3800.32 (n)

18. A student has the right to clean, seasonal clothing that is age and gender appropriate. Appropriate seasonal clothing will be provided by the Glen Mills Schools. §3800.32 (o)

19. A student shall be assured that consent forms are sent to parent(s)/guardian(s) within 24 hours of admittance. (educational, medical, etc.)

20. A student shall be assured that a representative of the Glen Mills Schools will be provided for court hearings upon request, i.e. adjudicatory, dispositional, review and status, etc.

21. A student shall be assured that the Glen Mills Schools will provide a copy of his Individual Service Plan, his Progress Reports and his Discharge Summary, to court systems and/or other appropriate social service agencies.

22. A student shall be informed of our policy regarding "Non-Discrimination of Services".

23. A student shall receive scheduled services as determined by his assessed needs; services will be provided as described in our program description for the term of the contract. A student's needs assessment shall be based upon contact and/or existing referral information about the youth and his family, and updated information obtained from relevant sources, academic assessment testing, vocational interest and aptitude assessment, psychological testing, medical/dental evaluation, etc.

24. A student shall have an Individual Service Plan developed within 30 days of admission. The ISP will be used to evaluate a student's progress. A student's progress will be monitored on a daily basis and reviewed and evaluated on a weekly basis when he is assigned a position on the unit's "force field". Parent(s)/Guardian(s), Probation Officers and significant others may help in the development of goals and plans through contact with the Schools.

25. A student shall be furnished a copy of his ISP, his parent(s)/guardian(s), his probation officer/case worker shall also be furnished a copy of the ISP. Parent(s)/guardian(s), probation officer(s)/case worker(s) may sign the ISP. A signed copy of the ISP shall be placed in the student's record.

26. A student shall participate in Guided Group Interaction sessions (group counseling/discussions) a minimum of 5 days per week, 1 hour per session.

27. A student shall learn life and social skill awareness utilizing the GMS ongoing process of peer/staff confrontation of negative behavior and offering of useful feedback and involvement in academic and vocational classes. Documentation of receptiveness and utilization shall be made in Progress Reports.

28. A student shall participate in daily recreational and leisure activities, unless medically or physically contraindicated.

29. A student approaching the completion of the Glen Mills Schools' program shall have a discharge plan developed with recommendations.

30. An overnight kit will be provided upon arrival.

31. A student shall be given a complete medical examination on the first Monday following arrival.

32. A student shall have an initial dental screening following arrival; needed dental care will be provided by individual appointment on a priority-based schedule. Services will be provided by the Glen Mills Schools' Dental Center.

33. A student shall receive an additional physical examination at least once per year.

34. A student shall receive a psychological evaluation within fourteen days of arrival by the Diagnostic and Evaluation Center.

35. A student shall be administered the Metropolitan Achievement Test to determine appropriate placement in our five tiered academic program within fourteen days of arrival provided by our Educational Department.

36. A student shall participate in academic instruction on a week day basis. GMS provides year round, on grounds, five tiered academic programs.

37. A student shall receive an education at his appropriate academic level.

38. A student based upon previous determination and/or upon evaluation and found to be in need of Special Education Services shall be provided with all necessary services.

39. A student shall be provided with transcripts upon discharge for re-enrollment in school.

40. Academically qualified students shall be assured that Glen Mills Schools will provide transcripts, letter of recommendation and other pertinent data to assist in college placement.

41. A student shall have an opportunity to receive a vocational assessment and select a vocational training area based upon aptitude and interest within three weeks of arrival provided by the Vocational Department.

42. A student shall be provided with pre-vocational and/or vocational training skills based upon aptitude and interest through the Vocational Department.

43. A student shall be assigned to a clean living facility, room and bed immediately upon arrival.

44. A student shall have the opportunity to receive four meals a day - unlimited quantity of top quality food.

45. A student shall be assigned an individual counselor within 24 hours of admittance to the facility.

46. A student shall be assigned a "big brother" within 24 hours of admittance. The "big brother", a member of the Battling Bulls Club shares in the responsibility of providing an orientation to our campus and norms.

47. A student shall be provided with one-to-one counseling sessions with his individual counselor. Informal counseling occurs daily and formal structured counseling occurs a minimum of once per week.

48. A student shall be given a telephone call home the evening of his arrival.

49. A student shall receive an orientation, which shall include an explanation of our BEHAVIORAL INTERVENTION PLAN and THE POLICY FOR PROCESSING CONCERNS AND GRIEVANCES within 24 hours of arrival.

50. A student shall receive an orientation by his staff and peers and introduced to all members of his living unit the first day of arrival.

51. A student shall be given a tour of the campus by his "big brother" within 72 hours of arrival.

52. A student shall be assigned to a GGI group within 24 hours.

53. A student shall have access of telephones located in the Student Union during the following hours: 12:00 Noon - 1:00 PM, 3:00 - 5:00 PM and 7:00 - 9:00 PM daily.

54. A student shall receive a $2.50 spending voucher, every two weeks, which can be spent in the Student Union.

55. A student shall have access to laundry facilities and supplies in his living unit.

56. A student shall be provided clean bed linens at least once per week.

57. A student shall be assigned to an intramural sports team the first Wednesday after admittance.

58. A student shall have access to the schedule of upcoming weekend activities.

59. A student shall be assured of one haircut per month.

THE POLICY FOR PROCESSING CONCERNS AND GRIEVANCES

GRIEVANCE PROCESSING FOR STUDENTS & PARENT(S)/GUARDIANS

A copy of STUDENT'S RIGHTS has been furnished to you. As a student and/or parent(s)/guardian of a student, you have a right to lodge a grievance without fear of retaliation.

A. Grievances and concerns can be discussed directly with any or all of the following who have knowledge to assist you in processing your concerns and grievances. All staff members who serve in the following positions are required reporters under § 6311(c) related to the Pennsylvania Child Protective Services Law.

- Teacher/Counselors – Classrooms & Living Unit
- Senior Counselors – Living Units
- Team Leaders – Living Units or Group Living Office – Ground Floor Administration Building
- Group Living Director – Ground Floor Administration Building
- Managing Director – 1st Floor Administration Building
- Executive Director – 1st Floor Administration Building

B. As a student residing on the campus of the Glen Mills Schools you have several other options which you may use in dealing with your problems or grievances.

- Peer(s): One-On-Ones, G.G.I. and Townhouse Meetings
- Members of the Battling Bulls Club: Cottage Bulls & Cottage Officers and Campus Executive Officers

C. If you are unable to solve your problem or grievance using this process. You will have the opportunity to talk with your agency's representative; your Probation Officer or Worker.

PEER ONE – ON –ONES

Peers are members of your living unit. You may speak to them privately to discuss a concern or grievance. They may be able to give you feedback about you concern or grievance.

G.G.I.

G.G.I. is a group where students sit and share problems. Students give feedback to one another to help each other with the problems they have. G.G.I. meets daily Monday through Friday. A staff member is present to guide the group.

TOWNHOUSE MEETINGS

Townhouse Meetings are held daily. These meetings are an assembly of all students who reside in a living unit. Primarily this is a meeting to share campus and unit information. This is a meeting, which is guided by a staff member. All on-duty staff members in the living unit are present during Townhouse Meetings. Students can discuss concerns and grievances during these meetings.

BULLS

Each unit has a Cottage Bulls Club. Each Cottage Bulls Club has officers who are elected by fellow club members. Cottage Bulls and Cottage Officers are available to hear and help with concerns and grievances.

The Campus Executive Bulls are the elected officers of the Campus Student Government. Campus Executive Bulls provide student leadership on campus and are available to listen to the concerns and grievances of students and to help them in finding solutions to their problems.

COUNSELOR/TEACHER

As a student at the Glen Mills Schools, you have been assigned a Counselor/Teacher. Your counselor will have the primary responsibility for your well being and care. You may discuss your concerns and grievances with your counselor or any other counselor.

SENIOR COUNSELOR

Each living unit has two Senior Counselors. There is a Senior Counselor on duty during the AM shift and a Senior Counselor on duty during the PM shift. Senior Counselors are the supervisors in the living units. They are available to talk with any student regarding concerns or grievances during their shifts.

TEAM LEADERS

Team Leaders at the Glen Mills Schools are responsible for the needs and welfare of the students under their supervision and for the well being of the campus. They are available, on call, 24 hours per day - seven days per week. Team Leaders are available to talk with any student regarding concerns or grievances.

GROUP LIVING DIRECTOR

The Group Living Director resides on the grounds of the Glen Mills Schools and has a direct phone line to the campus. He, or his designee, is on call 24 hours a day -7 days a week. The Group Living Director oversees all aspects of the welfare and well being of students and is available at any time to deal with the needs of students. The Director of Group Living maintains regularly scheduled office hours to meet privately with students and is available to hear student concerns and grievances at any time.

MANAGING DIRECTOR

The Managing Director is responsible for the day to day management of the Schools and further responsible for the welfare and well being of all students in placement. The Managing Director resides on the grounds of the Glen Mills Schools and is available by phone 24 hours a day -7 days a week. The Managing Director maintains regularly scheduled office hours and is available to hear student concerns and grievances as needed.

EXECUTIVE DIRECTOR

The Executive Director of the School resides on the campus of the Glen Mills Schools, has a direct phone line to the Schools and is on call 24 hours a day, 7 days a week. The Executive Director oversees every aspect of the Glen Mills Schools and is responsible for the care and well being of every student on campus. He makes himself available at any time to listen to the concerns and grievances of students, as well as staff. During the week, the Executive Director formally meets with the entire Resource Team consisting of the Managing Director, Group Living Director, Director of Student Placement, Director of Education, Director of Admissions, Director of Support Services and the Director of Special Services & Vocational Education. The Executive Director meets weekly with the Team Leaders, as well as, the President of the Battling Bulls Club. The Executive Director has the authority for all decisions involving admission and expulsion of students, as well as, the hiring and terminating of staff.

The Glen Mills Schools Student Grievance Process

A copy of the "Students Rights" has been given to you. As a student of the Glen Mills Schools you have the right to lodge a grievance, without fear of retaliation, if you feel that your rights have been violated. If a student identifies a violation of regulations, appropriate corrective action will occur and the Managing Director will be notified in writing.

1. If, as a student, you have a concern that your rights were violated there are several options, which you may use in dealing with your grievance. You may discuss your grievance with a peer (your roommate, "Big Brother" or Battling Bulls Club member). A peer may be able to help resolve your grievance or give you helpful feedback. Another option would be to express your grievance to your Guided Group Interaction (G.G.I.) group for feedback and direction. You may also express your grievance during your cottage Townhouse meeting or cottage Battling Bulls Club meeting. You may choose to use these options or you may want to speak directly with any of the staff listed in this process.
2. If you have a concern about a violation of your rights you can speak with your individual cottage counselor. This should be done within five days of the date when you felt your rights had been violated. If your counselor is not able to resolve your concern you should speak with the Senior Counselor of your cottage. The Senior Counselor will record your grievance on the "Grievance Tracking Form". You will have to write down what right was violated and exactly what your grievance is and sign the form. The Senior Counselor will try to resolve your grievance within a five working day time period from when you signed the form. If your grievance is resolved you will sign the "Grievance Tracking Form" and what was done will be recorded.
3. If you do not feel your grievance has been resolved you may ask the Senior Counselor to have the "Grievance Tracking Form" passed on to the cottage Team Leader. You may speak with your cottage Team Leader about your grievance. The cottage Team Leader will record on the "Grievance Tracking Form" the date you spoke to him. The Team Leader will have five working days to try and resolve your grievance. If your Grievance is resolved you will sign the "Grievance Tracking Form" and what was done will be recorded.
4. If you do not feel your grievance has been resolved you may ask the Team Leader to have the "Grievance Tracking Form" passed on to the cottage Group Living Director. You may speak with the Group Living Director about your grievance. The Group Living Director will record on the "Grievance Tracking Form" the date you spoke to him. The Group Living Director will have five working days to try and resolve your grievance. If your Grievance is resolved you will sign the "Grievance Tracking Form and what was done will be recorded.

5. If you do not feel your grievance has been resolved you may ask the Group Living Director to have the "Grievance Tracking Form" passed on to the Managing Director. You may speak with the Managing Director about your grievance. The Managing Director will record on the "Grievance Tracking Form" the date you spoke to him. The Managing Director will have five working days to try and resolve your grievance. If your grievance is resolved you will sign the "Grievance Tracking Form" and what was done will be recorded.
6. If you do not feel your grievance has been resolved you may ask the Managing Director to have the "Grievance Tracking Form" passed on to the Executive Director. You may speak with the Executive Director about your grievance. The Executive Director will record on the "Grievance Tracking Form" the date you spoke to him. The Executive Director will have five working days to try and resolve your grievance. If your Grievance is resolved you will sign the "Grievance Tracking Form" and what was done will be recorded.
7. If you are unable to resolve your grievance using this process you will have the opportunity to talk with your Probation Officer or Worker. If your grievance is resolved you will sign the "Grievance Tracking Form" and what was done will be recorded.

TRACKING FORM FOR PROCESSING GRIEVANCES

Your description of what right was violated and your specific grievance:

_____ _____
(your signature) (date filed)

Grievances are processed within 25 working days.

Signature(s) of the person with whom you discussed your grievance and the date you spoke with them.

	Signature	Date
1. Senior Counselor		
2. Team Leader		
3. [redacted] Group Living Director Ground Level - Administration Building		
4. [redacted]k, Managing Director 1st Floor - Administration Building		
5. [redacted] Executive Director 1st Floor – Administration Building		
6. Probation Officer or Worker		

If grievance resolved describe how grievance was resolved, what was done and signature of person who helped you:

Grievance processed within 25 working days ☐ YES ☐ NO

_____ _____
(your signature) (date resolved)

_____ _____
(signature of person who resolved your grievance) (date resolved)

STAFF BEHAVIORAL MANAGEMENT PROGRAM

De-escalation Technique #1
Friendly Non-Verbal

The Friendly Non-Verbal is first in the order of Behavioral Intervention. When a staff member observes a student who is involved with a problem they will give this student a helpful non-verbal gesture. These gestures are made with the eyes, hands, head or other body parts. These gestures are used to change the behavior of this student at the immediate time of the problem. Non-verbals given with empathy are given to effect change. If after a helpful non-verbal is given the student does not change their behavior a non-verbal given with concern is the next technique utilized.

De-escalation Technique #2
Concern Non-Verbal

After the student has not responded to the helpful non-verbals the next form of Intervention is a concerned non-verbal. This can be done by staff through stern and forceful facial gestures, hand gestures or other non-verbal gestures. These non-verbals are used in order to change behavior or actions of a student at a particular time. If a student does not respond to this level of intervention, a helpful verbal technique will be used next.

De-escalation Technique #3
The Helpful Verbal

When a student is unable to read the concerned non-verbal, the next level would be the helpful verbal. At this time, staff would verbally communicate, in a cordial manner their concern with the student involved in the incident.

De-escalation technique #4
Concern Verbal

After a student who has been given a helpful verbal concerning his negative actions and disregards this, the next step of intervention would be a concern verbal. The concern verbal given by staff would inform the student in question that his actions are fast becoming a major concern to that staff member. Intervening staff would accomplish this by using different voice levels, facial expressions, and non-physical actions.

De-escalation Technique #5
Staff Support

Support is requested when the student ignores the concern verbal. This is used to alert the student that his actions have reached a high level of concern. This is done by enlisting staff support. Staff support is given through both non-verbal and verbal communications such as different voice levels and facial expressions. In addition, supporting staff also observes to ensure that all staff act professionally and prepare the physical environment to ensure safety in the event that the student becomes a threat to injure himself or others.

Manual Assist

In the event that the first five de-escalation techniques fail in motivating the student to change their behavior from negative to positive, a manual assist may be used. The sole purpose of the manual assist is to provide the student with a final attempt to gain self-control. The manual assist shall be conducted by staff placing their hands on the student's arm or shoulder area only and shall not exceed one minute. The purpose for this is to communicate to the student that their behavior is becoming a major concern to staff. The student's response will determine if the intervention will be de-escalated or if a restrictive procedure is necessary. If at any time during the manual assist the student becomes out of control and a threat to injure himself and/or others, a restrictive procedure will be utilized.

RESTRICTIVE PROCEDURES

PHYSICAL RESTRAINT

If all de-escalation techniques have failed and the student becomes a threat to himself or others, it is the responsibility of those involved to hold the young man until he appears to settle down. The staff's primary objective is to hold that young man and keep him safe and under control. The restraining staff will use the least amount of physical restraint as possible until the student is no longer out of control or a threat to himself or others. At this time, staff will take the opportunity to talk to the student and use the incident to help the student mature and grow.

STUDENT CONFRONTATION

The following is a list and description of acceptable and unacceptable techniques you may use when addressing a peer's negative behavior. Remember, the purpose of addressing behavior is to have your peer change their behavior from negative to positive, it is to help not hurt. Also, confront your peers the way you would like to be confronted as you are more likely to receive a positive response.

ACCEPTABLE STUDENT CONFRONTATIONS

Friendly Non-Verbal

When you observe a fellow student who is involved with a problem or acting negatively, you may give this student a friendly non-verbal gesture. These are made with the eyes, hands, head or other body parts. Your goal is to have the peer change their behavior at the immediate time of the problem. If your peer does not accept your friendly non-verbal you may try another technique.

Concern Non-verbal

This can be accomplished by utilizing stern and forceful facial gestures, hand gestures or other non-verbal gestures. Once again your goal is to help your peer change their behavior. If this technique is not successful you may try another one.

Helpful Verbal

Perhaps the peer you are trying to help does not understand your non-verbal. If this is the case try a helpful verbal by respectfully and cordially address the students' behavioral problem. Also, be specific when helping your peers.

Concern Verbal

In order to help your peer change their behavior it may be necessary to utilize a concern verbal. This concern verbal should inform your peer that their actions are fast becoming a major concern to everyone. You could accomplish this by using different voice levels, facial expressions, and non-physical actions.

Peer Support

In the event that all other techniques have failed it may be necessary to ask your peers for help. Peer support can be given through both verbal and non-verbal communications.

If at any time during an intervention you feel your peer may lose control or injure himself or others you are to immediately request staff assistance. Never attempt to touch or restrain your peers.

When and where Student Confrontation should be utilized.

1) Any time you observe negative behavior.
2) Guided Group Interaction
3) Townhouse
4) Student Government Meetings
5) Orientation of new peers
6) During any and all program areas when necessary.

Unacceptable Confrontations

Students are Never permitted to touch another student or restrain a student with regards to dealing with peer behavior.

12/16/2013 MON 15:39 FAX

GLEN MILLS
3800 STAFFING REQUIREMENTS

DIRECT CARE AND SUPERVISION

		3800.54(b)		3800.55 (a)(b)	3800.57(a)(b)(c)			
Unit	3800 Capacity	Required AM Shift	Required PM Shift	Required* Overnight	Required* Supervisor	Total Required	Current Staff	Difference
Taylor	51	7	7	4	1	19	15	4
Madison	67	9	9	5	1	24	14	10
Lincoln	68	9	9	5	1	24	14	10
Van Buren	30	4	4	2	1	11	14	-3
Jackson	68	9	9	5	1	24	14	10
Jefferson	68	9	9	5	1	24	14	10
Polk	73	10	10	5	1	26	15	11
Monroe	68	9	9	5	1	24	14	10
Tyler	81	11	11	5	1	28	15	13
Buchanan	60	8	8	4	1	21	13	8
Fillmore	63	8	8	4	1	21	21	0
Johnson	90	12	12	6	1	31	16	15
Hayes	88	11	11	6	1	29	16	13
Adams	32	4	4	2	1	11	16	-5
Garfield	43	6	6	3	1	16	14	2
SUB TOTAL	950					333	225	108

0084/094

Unit	3800 Capacity	Required AM Shift	Required PM Shift	Required* Overnight	Required* Supervisor	Total Required	Current Staff	Difference
Golf Course Manange-ment	N/A	N/A	N/A	N/A	N/A	N/A	15	
Vocational Learning Center	N/A	N/A	N/A	N/A	N/A	N/A	7	
Food Service	N/A	N/A	N/A	N/A	N/A	N/A	6	
Education	N/A	N/A	N/A	N/A	N/A	N/A	5	
Athletics	N/A	N/A	N/A	N/A	N/A	N/A	7	
Student Placement	N/A	N/A	N/A	N/A	N/A	N/A	4	
Library	N/A	N/A	N/A	N/A	N/A	N/A	1	
CADD-CAMM Design	N/A	N/A	N/A	N/A	N/A	N/A	1	
Print & Graphic Arts	N/A	N/A	N/A	N/A	N/A	N/A	3	

12/16/2013 MON 15:39 FAX 085/094

Unit	3800 Capacity	Required AM Shift	Required PM Shift	Required* Overnight	Required* Supervisor	Total Required	Current Staff	Difference
Welding	N/A	N/A	N/A	N/A	N/A	N/A	2	
Auto Body Repair	N/A	N/A	N/A	N/A	N/A	N/A	2	
Art & Design	N/A	N/A	N/A	N/A	N/A	N/A	1	
Ceramics	N/A	N/A	N/A	N/A	N/A	N/A	1	
Optics	N/A	N/A	N/A	N/A	N/A	N/A	2	
Automotive Technology	N/A	N/A	N/A	N/A	N/A	N/A	2	
Photo-graphy	N/A	N/A	N/A	N/A	N/A	N/A	1	
Radio Broadcast-ing	N/A	N/A	N/A	N/A	N/A	N/A	1	
Journalism	N/A	N/A	N/A	N/A	N/A	N/A	1	
Barbering	N/A	N/A	N/A	N/A	N/A	N/A	1	
Video Production	N/A	N/A	N/A	N/A	N/A	N/A	1	

12/16/2013 MON 15:39 FAX

0086/094

Unit	3800 Capacity	Required AM Shift	Required PM Shift	Required* Overnight	Required* Supervisor	Total Required	Current Staff	Difference
Residential Carpentry	N/A	N/A	N/A	N/A	N/A	N/A	1	
Health Center	N/A	N/A	N/A	N/A	N/A	N/A	1	
Dental Center	N/A	N/A	N/A	N/A	N/A	N/A	1	
Electrician Apprentice-ship	N/A	N/A	N/A	N/A	N/A	N/A	3	
Painting Apprentice-ship	N/A	N/A	N/A	N/A	N/A	N/A	2	
Carpentry Apprentice-ship	N/A	N/A	N/A	N/A	N/A	N/A	2	
Plumbing Apprentice-ship	N/A	N/A	N/A	N/A	N/A	N/A	1	
Auto Repair Apprentice-ship	N/A	N/A	N/A	N/A	N/A	N/A	1	

12/16/2013 MON 15:39 FAX

0087/094

Unit	3800 Capacity	Required AM Shift	Required PM Shift	Required* Overnight	Required* Supervisor	Total Required	Current Staff	Difference
Central Receiving Work Program	N/A	N/A	N/A	N/A	N/A	N/A	2	
GRAND TOTALS	950**					333	303++	30++

** Please note that the population of the Glen Mills Schools on August 10, 2000 was 772

++ These numbers do not reflect the 40 Overnight Counselors currently in employ

12/16/2013 MON 15:39 FAX 0088/094

EXHIBIT C

[redacted]

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

OFFICE OF CHILDREN, YOUTH AND FAMILIES
Southeast Region Field Office
502 State Office Building
1400 Spring Garden Street
Philadelphia, Pennsylvania 19130-4088
August 22, 2000

CHILDREN AND YOUTH DIVISION
TELEPHONE NUMBER
AREA CODE: (215) 560-7249/2823

Mr. [redacted]
Managing Director
Glen Mills School
Concordville, Pennsylvania 19331

Dear Mr. Ipock:

Thank you for your August 15, 2000 letter transmitting the revised plan of correction regarding the Glen Mills Schools. Your plan of correction reflects the agreements made at our meetings on August 8 and 15, 2000 and replaces the plans submitted on May 1 and 31, 2000. This plan of correction is accepted.

As we discussed in our recent meetings, our office will verify those corrections that you indicated have already been made. We will also observe staff training regarding staff obligations under the Child Protective Services Law and staff training regarding behavior management and restrictive procedures. We will interview staff and students and we will observe staff and student interaction in Townhouse meetings and in other settings on campus. This verification and monitoring will begin with an orientation meeting at your facility on August 23, 2000. [redacted] Assistant Regional Director, will manage the verification and monitoring process.

As soon as we are satisfied that the corrective actions contained in the plan have occurred or are well underway, we will reassess the status of your provisional certificate of compliance. We are hopeful that we will be able to verify that necessary corrections have been made and that the facility is working in good faith to correct any outstanding violations.

Thank you for your cooperation during our most recent meetings.

Sincerely,

[redacted]
Director
Southeast Regional Office of
Children, Youth and Families

cc: Mr. Dorie White
Mary C. Walsh, Esq.

EXHIBIT D

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE
P.O. BOX 2675
HARRISBURG, PENNSYLVANIA 17105-2675

JO ANN R. LAWER
Deputy Secretary for
Children, Youth and Families

PHONE: (717) 787-4756
FAX: (717) 787-0414

OCT 04 2000

[redacted]
Board President
Glen Mills Schools
Glen Mills Road
Concordville, Pennsylvania 19331

RE: Glen Mills Schools
Glen Mills Road
Concordville, PA 19331

Dear Mr. Johnson:

As a result of the Department of Public Welfare's Annual Evaluation on February 11 and March 16, 2000, of the above-named facility, we have noted deficiencies with Chapter 3800 – Child Residential and Day Treatment Facilities of the Department of Public Welfare's Social Service Manual. Your plan of correction has been reviewed and approved. Site visits conducted on August 23, September 15, September 18, and September 28, 2000 verified that this plan is being implemented. Based on our site visits verifying implementation of your approved plan of correction a full certificate of compliance is being issued to the above-named site for Chapter 3800 – Child Residential and Day Treatment Facilities.

Your copy of the certificate is enclosed.

Sincerely,

Jo Ann R. Lawer, Esquire

Enclosures

[redacted]

once a year, unless otherwise specified by statute.

(b) A separate certificate of compliance shall be issued for each physical structure that qualifies for a certificate.

APPLICATION: One certificate of compliance will be issued for each program type (including secure care, secure detention, transitional living, outdoor program, mobile program, and day treatment) and each physical structure/building that qualifies for a certificate.

- If there are several buildings on a campus type setting, each building will be issued its own certificate.
- If several types of programs (including secure care, secure detention, transitional living, outdoor program, mobile program, and day treatment) are operated within one building, a separate certificate will be issued for each program. A new "Application for Certificate of Compliance" (DPW Form # PW 633) must be submitted, and a new Certificate of Compliance must be issued, prior to the operation of a new program.
- For outdoor programs that have several cabins, huts or teepees on one physical premises, one Certificate of Compliance will be issued for the entire premises.

Subsections 3800.4 (a) and (b) do not apply for transitional living. The following procedures apply for the inspection and issuance of certificates for transitional living:

- Each building in which transitional living is provided shall be inspected at least once a year.
- Annual inspection of each individual transitional living residence within the building is not required. A minimum of a 25 % random sample of the residences must be inspected during the annual inspection.
- The Certificate of Compliance will not specify a capacity.
- The Certificate of Compliance will not specify the addresses of the individual transitional living residences/apartments/units.
- If a transitional living residence is located within a facility that has a Certificate of Compliance under these regulations for another type of facility, no additional Certificate will be issued.

NOTE: The Chapter 3680 regulations titled "Private Children and Youth Agencies" no longer apply to child residential and day treatment facilities. If the facility operates only residential and/or day treatment services, as of October 26, 1999 the only Certificate of Compliance that will be issued is for Chapter 3800. Administrative office buildings and staff offices/residences are not governed by Chapter 3800 and as such will not be inspected, except as necessary to review records or conduct interviews pertaining to compliance with Chapter 3800. Buildings such as dining halls, bath facilities, schools, and recreation buildings will be inspected to the extent that the areas are governed by Chapter 3800.

If however, the agency also operates foster child care and/or adoption services a Chapter 3680 Certificate is still required for those services (but not for 3800 services).

DEFINITIONS - § 3800.5

12/16/2013 MON 15:40 FAX

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

CERTIFICATE OF COMPLIANCE

This Certificate is hereby granted to GLEN MILLS SCHOOLS
(LEGAL ENTITY)

To operate GLEN MILLS SCHOOLS
(NAME OF FACILITY OR AGENCY)

Located at GLEN MILLS ROAD, CONCORDVILLE, PA 19331
(COMPLETE ADDRESS OF FACILITY OR AGENCY)

(ADDRESS OF SATELLITE SITE) (ADDRESS OF SATELLITE SITE)

(ADDRESS OF SATELLITE SITE) (ADDRESS OF SATELLITE SITE)

(ADDRESS OF SATELLITE SITE) (ADDRESS OF SATELLITE SITE)

To provide RESIDENTIAL SERVICES
(TYPE OF SERVICE(S) TO BE PROVIDED)

The total number of persons which may be cared for at one time may not exceed 950
(MAXIMUM CAPACITY)

Restrictions:

This certificate is granted in accordance with the Public Welfare Code of 1967, P.L. 31, as amended, and Regulations

TITLE 55, PA CODE: CHAPTER 3800 - CHILD RESIDENTIAL AND DAY TREATMENT FACILITIES
(MANUAL NUMBER AND TITLE OF REGULATIONS)

Dated OCTOBER 26, 1999

and shall remain in effect from OCTOBER 5, 2000 until OCTOBER 5, 2001

unless sooner revoked for non-compliance with applicable laws and regulations.

No: 137300

V. Kuhlman
ISSUING OFFICER

William G. Lewis
DEPUTY SECRETARY

NOTE: This certificate is issued for the above site(s) only and is not transferable and should be posted in a conspicuous place in the facility.

PW 628 - 6-85

004/004

pennsylvania
DEPARTMENT OF PUBLIC WELFARE

CERTIFIED MAIL – RETURN RECEIPT
MAILING DATE:

Dr. Randy A. Ireson, Executive Director
Glen Mills Schools
P.O. Box 5001
Concordville, Pennsylvania 19331

DEC 0 6 2013

RE: License #s: 113030, 137300, 112860, 113020, 112940, 113010, 112890, 112960, 112980, 112880, 112970, 113060, 113050, 112920

Dear Dr. Ireson:

Thank you for your requests for waivers of 55 Pa.Code Ch. 3800 (relating to child residential and day treatment facilities).You have requested a waiver of 55 Pa.Code § 3800.55(a) and 55 Pa.Code § 3800.55(b) (relating to child care worker) for the licensed facilities listed above.

The Department of Public Welfare (Department) is denying a waiver of 55 Pa.Code § 3800.55(a) and 55 Pa.Code § 3800.55(b) (relating to child care worker) in accordance with § 3800.22(a)(1)-(3) (relating to waivers) since there is jeopardy to the children; there is no alternative for providing an equivalent level of health, safety and well-being protection of the children; and the benefit of waiving the regulation does not outweigh any risk to the health, safety and well-being of the children. The primary benefit of this regulation is that it ensures a sufficient amount of staff are present to supervise and protect children in care.

If you disagree with the Department's decision to deny the waiver, you have the right to appeal through hearing before the Bureau of Hearings and Appeals, Department of Public Welfare in accordance with 1 Pa.Code Part II, Chs. 31-35. If you decide to appeal, a written request for an appeal must be received within 10 days of the date of this letter by:

[redacted] Enforcement Manager
Bureau of Human Services Licensing
Department of Public Welfare
631 Health and Welfare Building
625 Forster Street
Harrisburg, Pennsylvania 17120

This decision is final 11 days from the date of this letter, or if you decide to appeal, upon issuance of a decision by the Bureau of Hearings and Appeals. You are reminded that compliance with the regulation is required until the appeal is heard.

Sincerely,

Matthew Jones
Acting Director