pennsylvania
DEPARTMENT OF PUBLIC WELFARE

JUL 10 2014

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

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

Dear Dr. Ireson:

As a result of the Department of Public Welfare's licensing inspection on March 10, 2014, March 11, 2014, March 12, 2014 and March 13, 2014, of the above facility, the violations with 55 Pa.Code Ch. 3800 (relating to Child Residential and Day Treatment Facilities) specified on the enclosed License Inspection Summary were found.

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

Your regular license for the period July 1, 2014 to July 1, 2015 was issued on March 26, 2014. Your regular license remains in good standing.

Sincerely,

Matthew J. Jones/DK

Matthew J. Jones
Director

Enclosure
License Inspection Summary

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

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

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

Program Type:	Licensed Capacity:	Number of Children Served:
Residential Services	81	46

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

Reason(s) for Inspection(s)
Renewal

On-Site Inspections Dates and Department Representatives On-Site
03/10/2014: Brice, Joseph; Havener, Cara; Safko, Jaqueline; Nardone, Janelle
03/11/2014: Brice, Joseph; Havener, Cara; Safko, Jaqueline; Nardone, Janelle
03/12/2014: Brice, Joseph; Havener, Cara; Safko, Jaqueline; Nardone, Janelle
03/13/2014: Brice, Joseph; Havener, Cara; Safko, Jaqueline; Nardone, Janelle

Off-Site Inspection Dates and Inspectors, if Applicable

Other Details

Partial or Full Triggers:	Random Indicators:

Child Demographic Data as of Inspection Dates

Age of Children:	Number of Children who:
0 to 5 years: 0	Are Adjudicated Delinquent: 45
6 to 13 years: 0	Are Dependent: 1
14 to 17 years: 36	Have Mental Illness: 0
18 to 21 years: 10	Have an Intellectual Disability: 0
	Have a Physical Disability: 0

Licensing Inspection Summary: 13730 - 03/10/2014 - Brice, Joseph
Facility Name: MCKINLEY HALL

1. REGULATION 55 Pa.Code §3800
3800.82(b) - Poisonous materials shall be stored in their original, labeled containers.

2a. DESCRIPTION OF VIOLATION
One unlabeled spray bottle containing The Bullen Companies Glass Cleaner was found in the locked supply closet. The Bullen Companies Glass Cleaner's label reads "If swallowed, drink plenty of water. Call a physician immediately."

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

The Glen Mills Schools understand the importance of adherence to Pa Code Title 55 3800.82(b), which states that poisonous materials shall be kept in their original labeled containers. The spray bottles in question were locked in a supply closet and not accessible to residents. Team Leader [redacted] will make sure that all poisonous materials are stored in their original, labeled containers. Routine inspections will also be done by our Assistant Group Living Director, [redacted] to make sure that the poisonous materials are being handled properly. The spray bottles in question now have labels provided by the manufacture attached to them. Please see Attachment D for verification of the labels being added to the spray bottles. The invoice from the Bullen Company, for the purchase of the labels is hereto attached as Attachment E.

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

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

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

Date April 30, 2014

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

The above plan of correction is approved as of 5/1/14 (Date)

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

Plan of correction implementation status as of 5/1/14 (Date)

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

Licensing Inspection Summary: 13730 - 03/10/2014 - Brice, Joseph
Facility Name: MCKINLEY HALL

1. REGULATION 55 Pa.Code §3800
3800.104(c) - Food shall be protected from contamination while being stored, prepared, transported and served.

2a. DESCRIPTION OF VIOLATION
A tray of uncovered chicken patties labeled "Sunday" was in the downstairs refrigerator.

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

The tray of uncovered chicken patties was removed immediately following the inspection of McKinley Hall. In accordance with Pa Code Title 55 3800.104(c), the Team Leader of McKinley Hall, [redacted] is responsible to make sure that all food is protected from contamination while being stored, prepared, transported, and served. [redacted] will conduct weekly checks of food in the facility to assure that it is protected from contamination.

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Licensing Inspection Summary: 13730 - 03/10/2014 - Brice, Joseph
Facility Name: MCKINLEY HALL

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

2a. DESCRIPTION OF VIOLATION
Child 1 was admitted to the facility on 1/10/2014. A health and safety assessment for the child was not completed until 1/13/2014.

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

The Glen Mills Schools understands the importance of Pa Code Title 55 3800.141(A) and will continue to make sure that all health and safety assessments are done within 24 hours of admission. If for some reason a child is admitted into our program late Friday evening, we have an on call nurse available to come in on to make sure that the health and safety assessment is completed within the proper time frame.

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Licensing Inspection Summary: 13730 - 03/10/2014 - Brice, Joseph
Facility Name: MCKINLEY HALL

1. REGULATION 55 Pa.Code §3800
3800.143(e) - The health examination shall include: (1) - (15)

2a. DESCRIPTION OF VIOLATION
The annual physical examinations completed for Child 2 did not include the following information: a comprehensive health and developmental history, including both physical and behavioral health development; an assessment of the child's health maintenance needs, medication regimen and the need for blood work at recommended intervals; allergies or contraindicated medications; and physical or mental disabilities of the child, if any.

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

The Glen Mills Schools completed an annual physical examination for Child 2 within the expected time frame. The Glen Mills Schools understands the importance of being in compliance with Pa Code Title 55 3800.143(E) and has since updated our annual physical examination forms to include a comprehensive health and developmental history, including both physical and behavioral health development, an assessment of the child's health maintenance needs, medication regimen, the need for blood work at recommended intervals, allergies or contraindicated medications, and physical or mental disabilities of the child. Attachment A is the physical form that will be utilized to conduct physicals on students of Glen Mills Schools. This form was enacted on April 17, 2014. [redacted] (Nurse) will be responsible to make sure the physical examination forms are used from this point forward and updated as needed.

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Licensing Inspection Summary: 13730 - 03/10/2014 - Brice, Joseph
Facility Name: MCKINLEY HALL

1. REGULATION 55 Pa.Code §3800
3800.188(a) - A staff person who has completed and passed a Department-approved medications administration course within the past 2 years is permitted to administer oral, topical and eye and ear drop prescription medications and epinephrine injections for insect bites.

2a. DESCRIPTION OF VIOLATION
On July 9, 2007 the Office of Children, Youth and Families sent a letter to all Child Residential and/or Day Treatment providers informing them that The Department of Public Welfare Medication Administration Train the Trainer's Program would be the only accepted medication administration program effective June 30, 2009. The facility is still utilizing their own medication administration course. The facility's nurses are the medication administration trainers and they are not certified under the Department of Public Welfare Medication Administration Train the Trainer's Program to train non-medical staff members.

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

The Glen Mills Schools was granted approval to use our own Medication Administration Training by the Department of Public Welfare, Office of Children, Youth, and Families on a bi-annual basis up until 2012. This training allowed our staff to be trained to administer oral, topical, eye and ear drop prescription medications, and epinephrine injects for insect bites. The Glen Mills Schools' Medication Administration Training had been approved following the 2007 letter to residential facilities concerning medication administration. To continue with the approval of the Glen Mills Schools' medication administration training, Glen Mills Schools sent out the bi-annual request for approval of our training in May of 2012 to the Department of Public Welfare, Office of Children, Youth, and Families. Following the 2014 annual inspection, Glen Mills Schools responded to Pa Code Title 55 3800.188(a) by having 71 of our current employees trained by State of Pennsylvania certified trainers. The training of Glen Mills Schools' employees was completed by March 28, 2014. The Glen Mills Schools also had two of our in-house trainers and one of our registered Nurses trained in the Department of Public Welfare's Medication Administration, Train the Trainers Program on April 17th, 2014. This will allow for the remainder of direct care employees at Glen Mills Schools to be trained. Please find attached as Attachment B, the certifications of the independent trainers, sign-in sheets from the reported trainings, completed observation forms, and medication certifications of 3 Glen Mills Schools' employees. [redacted] Director of Special Services, will continue to be responsible for the medication administration training of Glen Mills Schools employees.

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- [ ] Not Implemented

Licensing Inspection Summary: 13730 - 03/10/2014 - Brice, Joseph
Facility Name: MCKINLEY HALL

1. REGULATION 55 Pa.Code §3800
3800.203(e) - The plan shall include: (1) through (7).

2a. DESCRIPTION OF VIOLATION
Child 3 was physically restrained on 10/17/13 at 12:05 pm, 10/17/13 at 12:15 pm, 11/1/13 at 3:05 pm, and 11/1/13 at 3:15 pm. The restrictive procedure plan for the child does not include the following: behavioral outcomes desired, methods for modifying behavior, length of time, and health conditions.

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

The Glen Mills Schools understands the importance of Pa Code Title 55 3800.203(e) in regards to restrictive procedure plans for the youth in our program. A restrictive procedure plan has been completed for Child 3. Attachment G represents a template for a Restrictive Procedure Plan that will be utilized for the youth at Glen Mills Schools. This form is effectively immediately. The Team Leader of McKinley Hall, [redacted] will be responsible to update and include behavioral outcomes desired, methods of modifying behaviors, length of time, and health conditions in any restrictive procedure plan, for a child whom restrictive procedures will be used on an anticipated basis.

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Printed Name and Title of Legal Entity Representative (Required on EVERY Page) Dr. Randy A. Ireson — **Date** April 30, 2014

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Licensing Inspection Summary: 13730 - 03/10/2014 - Brice, Joseph
Facility Name: MCKINLEY HALL

1. REGULATION 55 Pa.Code §3800

3800.205(b) - Training shall include:

(1) Using de-escalation techniques and alternative nonrestrictive strategies and addressing the child's feelings after use of a restrictive procedure.

(2) Child development principles appropriate for the age of the children served, to understand normal behavior reactions to stress at various ages.

(3) The proper use of the specific techniques or procedures that may be used.

(4) Techniques and procedures appropriate for the age and weight of the children served.

(5) Experience of use of the specific procedures directly on each staff person and demonstration of use of the procedure by each staff person.

(6) Health risks for the child associated with use of specific procedures.

(7) A testing process to demonstrate understanding of and ability to apply specific procedures.

2a. DESCRIPTION OF VIOLATION

According to the facility's trainer, Staff Member A, restrictive procedures training does not include using the specific procedures directly on each staff person and demonstration of use of the procedure by each staff person for the procedures to take a child from a standing position to the ground. The training also does not include any specific techniques to take a child from a standing position to the ground.

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

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

The Glen Mills Schools understands the importance of Pa Code Title 55 3800.205(b). [redacted] the Director of Special Services is responsible to make sure that staff member A and the rest of the members of our Training Division conduct a restrictive procedures training that includes using the specific procedures on each employee, each employee demonstrating the procedure to take a child from a standing position to the ground, and specific techniques to take a child from a standing position to the ground. Each direct care employee of Glen Mills Schools was provided a Behavioral Intervention Technique (BIT) supplemental training in the weekly meetings of each facility. This training was designed to include the required demonstrations indicated in 3800.205(b). The supplemental trainings to demonstrate the desired techniques will be completed by May 12, 2014. The demonstrations in the formal yearly BIT training began on April 30, 2014.

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Licensing Inspection Summary: 13730 - 03/10/2014 - Brice, Joseph
Facility Name: MCKINLEY HALL

1. REGULATION 55 Pa.Code §3800

3800.213 - A record of each use of a restrictive procedure, including the emergency use of a restrictive procedure, shall be kept and shall include the following:

(1) The specific behavior addressed.
(2) The methods of intervention used to address the behavior less intrusive than the procedure used.
(3) The date and time the procedure was used.
(4) The specific procedure used.
(5) The staff person who used the procedure.
(6) The duration of the procedure.
(7) The staff person who observed the child.
(8) The child's condition following the removal of the procedure.

2a. DESCRIPTION OF VIOLATION

A "Report of Physical Restraint" for a restraint done on 10/17/13 at 12:05 pm with Child 3 does not include the child's condition following the removal of the procedures.

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

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

The Glen Mills Schools is aware of the importance of properly recording and reporting the use of restrictive procedures in our facilities. The "Report of Physical Restraint" for Child 3 included all the required fields except the child's condition following the removal of the procedure. McKinley Hall, in adherence with Pa Code Title 55 3800.213, has added the child's condition following the removal of the procedure to the report. Team Leader of McKinley Hall [redacted] is responsible to make sure that a "Report of Physical Restraint" is accurately done and thoroughly checked to include the child's condition following the removal of the procedure.

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CHILD PRIVACY CODING DOCUMENT
CHILD RESIDENTIAL LICENSING - 55 Pa. Code Chapter 3800

Facility Name:MCKINLEY HALL	License Number:137300

Designation	Child's Name
Resident 1	[redacted]
Resident 2	
Resident 3	

Dr. Randy A. Ireson, Executive Director
Printed Name and Title of Legal Entity Representative

Randy Ireson
Signature of Legal Entity Representative

4/30/14
Date

Date of Inspection: 03/10/2014

STAFF PRIVACY CODING DOCUMENT
CHILD RESIDENTIAL LICENSING - 55 Pa. Code Chapter 3800

Facility Name:MCKINLEY HALL	License Number:137300

Designation	Staff Member's Name
A	[redacted]

Dr. Randy A. Ireson, Executive Director

Printed Name and Title of Legal Entity Representative

Randy Ireson

Signature of Legal Entity Representative

4/30/14

Date

Date of Inspection: 03/10/2014