Department of Human Services
Office of Children, Youth and Families

February 12, 2021

NATHANIEL WILLIAMS, PRESIDENT/CEO
CHILDFIRST SERVICES, INC.
2085 NORTH 63RD STREET,SUITE 2
NATHANIEL WILLIAMS
PHILADELPHIA, PA, 19151

RE: INTEGRITY HOUSE
1378 EASTON TURNPIKE
LAKE ARIEL, PA, 18436
LICENSE/COC#: 20887

Dear Mr. Williams,

As a result of the Pennsylvania Department of Human Services, Office of Children, Youth and Families licensing inspections on 09/23/2020 through 11/30/2020 of the above facility, the citations specified on the enclosed Licensing Inspection Summary (LIS) were found.

We have determined that your plan of correction is: Acceptable

All citations specified on the plan of correction must be corrected by the dates specified on the License Inspection Summary (violation report) and continued compliance with Department statutes and regulations must be maintained.

Sincerely,
Brian Hazlak

Enclosure
Licensing Inspection Summary (LIS)

cc: Pennsylvania Office of Children, Youth and Families

Department of Human Services
Office of Children, Youth and Families
LICENSING INSPECTION SUMMARY
55 PA.CODE CHAPTER 3800

Agency/Facility Information

Name: *INTEGRITY HOUSE*
License Number: *20887*
Address: *1378 EASTON TURNPIKE, LAKE ARIEL, PA 18436*
License Expiration: *05/08/2020*
County: *WAYNE* **Phone**: *5706981459*

Inspection Information

Start Date: *09/23/2020* **End Date**: *11/30/2020* **Type**: *Complaint* **Notice**: *Unannounced Visit*
Inspector(s): *Marie Flynn-Boyd, Mark Piazza, Jonathan Veet*

Inspection Narrative

The Department of Human Services Office of Children, Youth and Families conducted a complaint inspection on 9/25/2020 and a monitoring inspection of Integrity House on 11/13/2020. The visit consisted of physical site inspections and conversations with children and staff. The following violations are being cited in accordance with the 3800 regulations and requires a plan of correction.

Inspections / Reviews

09/23/2020 - Complaint

Lead Inspector: *Marie Flynn-Boyd* **Follow-Up Type**: *POC Submission* **Follow-Up Date**: *12/23/2020*

1/11/2021 - POC Submission

Lead Reviewer: *Brian Hazlak* **Follow-Up Type**: *POC Submission* **Follow-Up Date**: *01/18/2021*

2/11/2021 - POC Submission

Lead Reviewer: *Brian Hazlak* **Follow-Up Type**: *Document Submission* **Follow-Up Date**: *03/02/2021*

3800.16 Reportable Incidents

1. Requirements

3800.16.c. The facility shall complete a written reportable incident report, on a form prescribed by the Department, and send it to the appropriate Departmental regional office and the contracting agency, within 24 hours.

Description of Violation

On 9/22/2020, an incident involving Child #1 occurred at the facility which required notification to the Department within 24 hours. While the facility notified the department of the initial incident of a physical altercation. The child was seen medically at a hospital on 9/23/20 and diagnosed with a closed head injury and concussion, for injuries sustained in the altercation. The child being seen outpatient and diagnosed for a serious injury at a hospital was not reported via HCSIS. This information was gathered upon the department requesting further information.

Plan of Correction **Do Not Accept**

On 9/22/2020 an incident ensued involving a physical altercation with Child #1, this child was offered medical attention and refused, the child was engaged by staff about needing to be seen however continued to refuse treatment, then the child was requested to sign a medical refusal treatment form. The next day the child went to school and complained at school about not feeling well and reported to school officials about the physical confrontation. The incident was investigated at the school and ChildFirst was notified of the need to have the child seen medically. The child was retrieved from school and this time agreed to be seen for an assessment and treatment as necessary. As a result of this incident, going forth, anytime a child is involved in a physical confrontation, the child will need to be seen by a medical professional for an assessment and treatment or at least to rule out there are no serious injuries. Incidents of a physical nature will be discussed on the daily incident call and follow up of medical intervention discussed and ensure has occurred within less than 24 hours of the incident occurrence. The HCSIS point person will ensure details as recorded and reported are congruent based on verbal confirmation and detailed in the final HCSIS report as well the updated safety plan as a result.

Completion Date: *12/23/2020*

Update - 12/30/2020

Provider's response does not address citation. This citation was issued in regards to a child requiring outpatient treatment at a hospital, 3800.16(a)(4), on 9/23/2020 and the facility not filing an incident report via HCSIS within 24 hours.

The Department also disagrees with the facility's assertion that the child refused medical attention. Interviews with children and staff members determined that the child requested medical attention immediately following the altercation.

3800.16 Reportable Incidents *(continued)*

Plan of Correction **Directed**

The provider provided this response as the revision to the plan of correction:
"As a result of this incident, going forth, anytime a child is involved in a physical altercation, the child will be seen by a medical professional immediately for an assessment and treatment , minimally to rule out there are no serious injuries. In the event a child refuses medical treatment, an ambulance will be called to intervene for this purpose."

The Department has determined that this response does not address the original citation, which is that the Provider failed to provide a reportable incident form to the Department within 24 hours of a child seeking medical treatment at the hospital and being diagnosed with a closed head injury and concussion after a previous incident involving a physical altercation. The facility reported the initial altercation, but a separate incident report should have been filed for the child visiting the hospital for medical follow up.

The Department directs the facility to do the following:
The facility will update its reportable incident policy to reflect that a single incident may require more than 1 report in certain instances, i.e. where a child is involved in a physical altercation on 1 day, if then 3 days later the child goes to the hospital for an unscheduled visit related to injuries sustained in that previous incident - another incident report should be filed to notify the Department that outpatient treatment was sought.

This update will be completed and implemented no later than 2/28/2021 and a copy provided to the Department via email within 2 business days of its finalization and approval by Facility Leadership.
Completion Date: *01/18/2021*

3800.32 Specific Rights

1. **Requirements**

   3800.32.k. A child has the right to appropriate medical, behavioral health and dental treatment.

   Description of Violation

   On 9/22/2020 child #1 did not receive the appropriate medical treatment needed for closed head injury and concussion. Child was not transported to recieve medical care until she went to school the following day and reported her injury to school staff. Per interviews with children, staff A and B who were in the home at the time were aware that child was struck in the head.

3800.32 Specific Rights *(continued)*

Plan of Correction **Accept**

The Child #1 refused medical treatment at the time of the incident. There were several attempts to engage and encourage the child to be seen to rule out any serious injury however the child continued to refuse treatment and finally requested to sign off on the medical intervention form as a medical refusal. As a result of this incident, going forth, the following protocol will be followed:

- *We will offer medical treatment, If refused the EOS will attempt to encourage and educate*
- *If still refused, the EOS will then contact the EOD to help intervene*
- *If still refused, the EOD will contact Nurses* [redacted]
- *If still refused, the youth will be asked to sign the refusal form*
- *Staff will continue to check in with the youth and encourage them to go seek treatment*
- *EOS will document all attempts by all parties to have the youth seek treatment on the Daily Log and in an incident report*
- *Incident reporter will notify external team members once the incident report is entered*
- *If HCSIS was required, all attempts and the signed refusal will be documented in HCSIS*

The HCSIS point person will ensure details as recorded and reported are congruent based on verbal confirmation and detailed in the final HCSIS report as well the updated safety plan as a result.

Completion Date: *12/23/2020*

3800.54 Child Care Supervisor

1. Requirements

3800.54.a. There shall be one child care supervisor available either onsite or by telephone at all times children are at the facility.

Description of Violation

On 9/22/2020 per child and staff interviews, there was not a child care supervisor available either on site or by phone to the facility when there were children at the facility.

Plan of Correction **Accept**

*The staff in program did not follow the protocol for reaching their immediate supervisor during an emergency, instead of calling the supervisor and/or the V.P. of Program services they texted. The staff involved will be retrained on the protocol to **call** using the emergency contact list posted by the phone in program, the retraining will occur on or before 12/31/2020.*

Completion Date: *12/23/2020*

3800.147 Use of Tobacco

1. Requirements

3800.147. Use of tobacco.

Description of Violation

On 11/13/2020 a cigarette butt was found outside in front of the facility.

3800.147 Use of Tobacco *(continued)*

Plan of Correction **Accept**

ChildFirst Services, Inc. acknowledges that these materials should not be on its premises and has taken measures to prohibit their presence going forth. No smoking paraphernalia and behavior signage has been secured and shall be posted inside and outside of the program in prominent locations within visual sight by December 31, 2020.

Completion Date: *12/23/2020*

3800.148 Health and Behavioral Health Services

1. Requirements

3800.148.a. The facility shall identify acute and chronic conditions of a child and shall arrange for or provide appropriate medical treatment.

Description of Violation

The facility did not identify an acute condition of Child #1 and did not arrange for or provide appropriate medical treatment. Child #1 was struck in the head with a pan by Child #2, and was subsequently diagnosed with a closed head injury and concussion. Medical treatment was not sought until the following day when the child went to school and reported the incident to school staff.

Plan of Correction **Accept**

ChildFirst Services, Inc. was not aware that that child #1 was struck in the head as the staff observe this did not report out with this detail. As a result of this incident, staff involved with receive a refresher training on how an incident must account for their account of events answering who, what, where, why, how, and when when recording and reporting of an incident. The HCSIS point person will ensure details as recorded and reported are congruent based on verbal confirmation and detailed in the final HCSIS report as well the updated safety plan as a result.

Completion Date: *12/23/2020*