Department of Human Services
Office of Children, Youth and Families

March 17, 2022

[redacted]
CHANGE ACADEMY LAKE OF THE OZARKS, LLC
2177 EAST WARNER ROAD,SUITE 101
Suite 101
TEMPE,, AZ, 85287

RE: EMBARK AT THE POCONOS
108 COUNTRY PLACE LANE
WHITE HAVEN,, PA, 18661
LICENSE/COC#: 23009

Dear [redacted],

As a result of the Pennsylvania Department of Human Services, Office of Children, Youth and Families licensing inspections on 11/30/2021 through 01/12/2022 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,
Marie Flynn-Boyd

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 - Public
55 PA.CODE CHAPTER 3800

Agency/Facility Information

Name: *EMBARK AT THE POCONOS*
License Number: *23009*
Address: *108 COUNTRY PLACE LANE, WHITE HAVEN,, PA 18661*
License Expiration: *02/25/2022*
County: *LUZERNE*

Inspection Information

Start Date: *11/30/2021* **End Date**: *01/12/2022* **Type**: *Renewal* **Notice**: *Announced Visit*

Inspector(s): [redacted]

Inspection Narrative

The PA Department of Human Services, Office of Children and Youth and Families conducted the annual inspection of Embark of the Poconoson the date above. Embark of the Poconos is a residential placement with a capacity of 16 and a current census of 11 at
the time of this inspection. The inspection consisted of a physical site inspection, medication audit, policy and procedure review,
record audits of 5 children and all staff members as well as interview with children and staff. The following is being cited in
accordance with Chapter 3800 regulations and requires a plan of correction.

Inspections / Reviews

11/30/2021 - Renewal

Lead Inspector: [redacted] **Follow-Up Type**: *POC Submission* **Follow-Up Date**: *03/04/2022*

03/17/2022 - POC Submission

Reviewer: [redacted] **Follow-Up Type**: *On-site Verification* **Follow-Up Date**: *04/29/2022*

3800.51 Child Abuse and Criminal History Checks

1. Requirements

3800.51. Child abuse and criminal history checks shall be completed in accordance with 23 Pa.C.S. § § 6301—6385 (relating to the Child Protective Services Law) and Chapter 3490 (relating to protective services).

Description of Violation

Staff member A was hired on [redacted], and did not obtain required PSP clearances until [redacted] 1.
Staff member B was hired on [redacted], and did not obtain required FBI and child abuse clearance until [redacted] and3/15/21.
Staff member C was hired on [redacted], and did not obtain FBI clearance until [redacted].
Staff member D was hired on [redacted] 1, and did not obtain FBI clearance until [redacted]
Staff member F was hired on [redacted] and did not obtain PSP [redacted], Child Abuse [redacted] clearances prior to hire.
Staff member H was hired on [redacted], and did not obtain PSP clearance until [redacted]
Staff member I was hired on [redacted] and did not obtain PSP [redacted], Child Abuse [redacted] prior to hire.
Staff member K was hired on [redacted], and did not obtain PSP [redacted], and child abuse clearance [redacted] prior to hire.
Staff member L was hired on [redacted], and did not obtain PSP clearance until [redacted]
Staff member M was hired on [redacted], and did not obtain PSP [redacted] and FBI [redacted] clearances prior to hire.
Staff member U was hired on [redacted], and did not obtain Child abuse [redacted] and FBI [redacted] clearances prior to hire.
Staff member V was hired on [redacted], and did not obtain PSP clearance until [redacted]
Staff member W was hired on [redacted] and did not obtain PSP [redacted] and child [redacted] clearances prior to hire.
Staff member X was hired on [redacted], and did not obtain PSP [redacted] clearances prior to hire. There was also no child abuse clearance found in Staff X's file.
Staff member Y was employed by facility [redacted] and did not have Child Abuse and FBI clearance on file.
Staff member Z was employed by the facility [redacted] there was no record of FBI clearance on file.
Staff member AA was hired on [redacted] and did not have FBI clearance done until [redacted]
Staff member AC was hired on [redacted] and did not have required PSP clearance completed until [redacted].

POC Submission ***Accept***

***Moving Forward, no employee will begin employment prior to all required clearances being on file.*
***Human Resource generalist will assure all required paperwork is on file before finalization of start date.*
*** Hiring manager is responsible to review all pre-hire paperwork with HR Generalist and will give approval for hire date only after validating all required clearances are on file.*
Completion Date: *02/28/2022*

3800.54 Child Care Supervisor

1. Requirements

3800.54. Child care supervisor.

d. The child care supervisor shall have one of the following:
   1. A bachelor's degree from an accredited college or university and 1 year work experience with children.
   2. An associate's degree or 60 credit hours from an accredited college or university and 3 years work

3800.54 Child Care Supervisor *(continued)*

experience with children.

Description of Violation

The facility does not have documentation that supervisors F, X, Y and AB have the required education and background experience. to be a child care supervisor.

POC Submission ***Accept***

** [redacted] *required credentials are attached.*

** *Other named staff are no longer employed by Embark*

** *Moving forward, all required credentialing verification will be obtained and filed prior to new staff start date.*

** *HR Generalist is required to obtain and file necessary documentation*

** *Hiring manager is required to review HR file to assure necessary documentation is on file prior to approving start date*

Completion Date: *02/28/2022*

3800.55 Child Care Worker

1. Requirements

3800.55.g. The child care worker shall have a high school diploma or general education development certificate.

Description of Violation

The facility does not have documentation that staff persons A, J, L, M, N, O, Z, AA, AND AC have the minimum child care educational qualifications for direct care staff.

POC Submission ***Accept***

** *Moving forward, all required credentialing verification will be obtained and filed prior to new staff start date.*

** *HR Generalist is required to obtain and file necessary documentation*

** *Hiring manager is required to review HR file to assure necessary documentation is on file prior to approving start date*

Completion Date: *02/28/2022*

3800.58 Staff Training

1. Requirements

3800.58. Staff training.

b. Prior to working alone with children and within 120 calendar days after the date of hire, the director and each full-time, part-time and temporary staff person who will have regular and significant direct contact with children, shall have at least 30 hours of training to include at least the following areas:

4. First aid, Heimlich techniques, cardiopulmonary resuscitation and universal precautions.
5. Crisis intervention, behavior management and suicide prevention.

Description of Violation

Staff persons A,D, K, L, M, O, S, V, AA, did not complete First Aid/CPR training within 120 calendar days of date of hire.

POC Submission ***Accept***

++CPR training schedule had been developed with American Red Cross

++ Prescheduled dates will occur 3x annually: March, July, November

++Staff hired will be assigned by the HR team to the upcoming training

++Hiring manager will assure attendance at the upcoming training

++Failure of staff to complete training will result in an inability to report to work until training is obtained.

Completion Date: *03/04/2022*

3800.58 Staff Training *(continued)*

2. Requirements

Description of Violation

Staff persons A,B,C,D,F,G,H,I,J,K,L,M,N,O,S,U,V,AA,AB,AD,and AF did not complete 30 hours of training within 120 calendar days of date of hire.

POC Submission ***Accept***

++Annual staff training plan has been developed (see attached)
++HR is responsible to assign all trainings
++Hiring manager/supervisor is to audit staff training records to assure completion
++Failure of staff to complete required trainings will result in suspension of work privilege until required trainings are completed
Completion Date: *03/04/2022*

3. Requirements

Description of Violation

Staff person G did not complete 30 hours of training within 120 calendar days of date of hire.

POC Submission ***Accept***

++40 Hours of annual training is required
++Annual Training Plan format has been updated to allow for better management/auditing
++HR is responsible to assure all required trainings in Relias are assigned annually
++Supervisor is responsible to assure staff are completing all trainings timely
++Staff who have not completed annual trainings timely will be subject to disciplinary action, including suspension until requirements are met
Completion Date: *03/04/2022*

3800.141 Child Health and Safety Assessment

1. Requirements

3800.141. Child health and safety assessment.
c. The assessment shall include the following:
2. Known or suspected suicide or self-injury attempts or gestures and emotional history which may indicate a predisposition for self-injury or suicide.

Description of Violation

Child 1's assessment did not include assessment related to known or suspected suicide or self-injury attempts or gestures and emotional history which may indicate a predisposition for self-injury or suicide.
Child 2's assessment did not include assessment related to known or suspected suicide or self-injury attempts or gestures and emotional history which may indicate a predisposition for self-injury or suicide.

POC Submission ***Accept***

++The Bio-Psych-Social must be competed within 24 hours of admission
by the clinical director, primary therapist and/or RN
++The C-SSRS-RF Columbia Risk Assessment is completed on every student (see page 5 of the attached)
++Planned interventions are outlined on the Initial Treatment Plan
Completion Date: *03/03/2022*

2. Requirements

3800.141 Child Health and Safety Assessment *(continued)*

Description of Violation

Child 5's assessment did not include completed medical information and health concerns such as hospitalizations, illness in the family , [redacted] or other illness.

POC Submission ***Accept***

++The Bio-Psych-Social must be competed within 24 hours of admission
by the clinical director, primary therapist and/or RN
++Health Screening questions are contained on pages 2-3
++Planned interventions for any identified health risks are outlined on the Initial Treatment Plan
++Clinical Director will audit charts weekly to assure compliance with this requirement
Completion Date: *03/04/2022*

3800.142 Health and Safety Plan

1. Requirements

3800.142. If the health and safety assessment in § 3800.141 (relating to health and safety assessment) identifies a health or safety risk, a written plan to protect the child shall be developed and implemented within 24 hours after the assessment is completed.

Description of Violation

Child 1's health and safety assessment identified a health or safety risk, and the facility did not write or implement a plan within 24 hours after the assessment is completed to protect the child. The safety plan was completely missing from the record.

Child 2's health and safety assessment identified a health or safety risk, and the facility did not write or implement a plan within 24 hours after the assessment is completed to protect the child. Safety plan was completely missing from the record.

Child 3's health and safety assessment identified a health or safety risk, and the facility did not write or implement a plan within 24 hours after the assessment is completed to protect the child. Safety risks of self harm and suicide were identified during the assessment, however there was not a safety plan for these risks in the record.

Child 4's health and safety assessment identified a health or safety risk and the facility did not write or implement a plan within 24 hours after the assessment is completed to protect the child. No safety plan was found in the record.

Child 5's health and safety assessment identified a health or safety risk and the facility did not write or implement a plan within 24 hours after the assessment is completed to protect the child. Admission date for this child is [redacted]. Safety plan was dated 11/29/2021 which is outside the 24 hour window.

POC Submission ***Accept***

++An Initial Treament Plan (ITP) is completed within 24 hours of admission
++Any risks identified through the BPS and Nursing Assessments is captured and reported out in the ITP
++ ITP is saved in Best Notes for review by all staff
++Staff notification to be sent to all team members reminding them of ITP review and signatures requirements
++Clinical Director is responsible to complete chart audits and ensure all required
Completion Date: *03/04/2022*

3800.143 Child Health Examination

1. Requirements

3800.143.a. A child shall have a health examination within 15 days after admission and annually thereafter, or more frequently as specified at specific ages in the periodicity schedule recommended by the American Academy of Pediatrics, ''Guidelines for Health Supervision,'' available from 141 Northwest Point Boulevard, Post Office Box 927, Elk Grove Village, Illinois, 60009-0927.

Description of Violation

Child 1 was admitted to the facility on [redacted] and did not have a health examination after admission and annually as required and did not have record of prior examination on file.

POC Submission ***Accept***

OCYF recommended forms has been implemented and now completed on all new admissions.

Attached are examples of completed exams done by [redacted], CRNP

Completion Date: *02/28/2022*

3800.144 Dental Care

1. Requirements

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

3800.144.c. A written record of completion of each dental examination, including the preadmission examination permitted in subsection (b), specifying the date of the examination, the dentist's name and address, procedures completed and follow-up treatment recommended and dates provided, shall be kept in the child's record.

Description of Violation

Child 1,3, 4 and 5 did not have dental exams in accordance with the AAP dental recommendations.

POC Submission ***Accept***

***Admission policy has been updated.*

***Parents will be required to submit proof of dental exam (completed <6 months of admission) prior to student being admitted.*

***Enrollment Director is responsible to validate required documentation is on file prior to students arrival on campus*

Completion Date: *02/28/2022*

3800.145 Vision Care

1. Requirements

3800.145.a. Each child shall receive vision screening and services to include diagnosis and treatment including eyeglasses, for defects in vision.

3800.145.b. Each child who is 3 years of age or older shall receive vision screening within 30 days after admission in accordance with the periodicity schedule recommended by the American Academy of Pediatrics, ''Guidelines for Health Supervision,'' and ''Eye Examination and Vision Screening in Infants, Children and Young Adults (RE9625).''

3800.145.e. A written record of completion of each vision screening, including the preadmission screening permitted in subsection (c), specifying the date of the screening, the treating practitioner's name and address, results of the screening, follow-up recommendations made, and the dates and provision of follow-up services and treatment, shall be kept in the child's record.

Description of Violation

Child 2 did not receive vision screening and services to include diagnosis and treatment including eyeglasses, for defects in vision.

Child 4 did not receive vision screening and services to include diagnosis and treatment including eyeglasses, for defects

3800.145 Vision Care (continued)

in vision.
Child 5 did not receive vision screening and services to include diagnosis and treatment including eyeglasses, for defects in vision.

POC Submission ***Accept***

Vision Screening now completed by [redacted], CRNP
Attached are examples of the Vison screens completed
Completion Date: *02/28/2022*

3800.146 Hearing Care

1. Requirements

3800.146.b. Each child who is 3 years of age or older shall receive a hearing screening within 30 days after admission in accordance with the periodicity schedule recommended by the American Academy of Pediatrics, ''Guidelines for Health Supervision.''

Description of Violation

Child 1 did not receive a hearing screening within 30 days after admission nor had record of prior exam in accordance with the periodicity schedule recommended by the American Academy of Pediatrics.
Child 2 did not receive a hearing screening within 30 days after admission nor had record of prior exam in accordance with the periodicity schedule recommended by the American Academy of Pediatrics.
Child 3 did not receive a hearing screening within 30 days after admission nor had record of prior exam in accordance with the periodicity schedule recommended by the American Academy of Pediatrics.
Child 4 did not receive a hearing screening within 30 days after admission nor had record of prior exam in accordance with the periodicity schedule recommended by the American Academy of Pediatrics.
Child 5 did not receive a hearing screening within 30 days after admission nor had record of prior exam in accordance with the periodicity schedule recommended by the American Academy of Pediatrics.

POC Submission ***Accept***

An audio meter was purchased by the program.
All students now undergo screening performed by [redacted], CRNP
Completion Date: *02/28/2022*

3800.151 Staff Health Statement

1. Requirements

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

Description of Violation

Staff persons B, D, G, H, I, K, M, O, U, W, X, Z, AA, AB, AC and AF did not have the required statement signed and dated by a licensed physician, certified registered nurse practitioner or licensed physician's assistant, within 12 months prior to working with children or food service and every 2 years thereafter.

POC Submission ***Accept***

++ As part of pre-employment hiring, new staff undergo a health screening by a licensed practitioner.

3800.151 Staff Health Statement (continued)

++HR is responsible to ensure Health Screening is completed prior to finalizing a start date
++ Hiring manager is responsible to review the new hire HR checklist and audit to assure all required elements are present
Completion Date: *03/03/2022*

3800.224 Development of the ISP

1. Requirements

3800.224. Development of the ISP.

Description of Violation

Child 1 was admitted on [redacted] and the ISP was incomplete and missing elements .
Child 2 was admitted on [redacted] and the ISP was incomplete and missing elements
Child 3 was admitted on 1[redacted] and the ISP was incomplete and missing elements
Child 4 was admitted on [redacted] and the ISP was incomplete and missing elements
Child 5 was admitted [redacted] and the ISP was incomplete and missing elements

POC Submission ***Accept***

++Embark at the Poconos utilizes a Master Treatment Plan to meet the requirements of the ISP.

++Treatment Plan is completed within 7 days of admission
++Educational Goals are added via an Addendum format
++Family Goals are identified as Caregiver problem areas
++Primary therapist is responsible to assure all requited elements are present in the MTP/ISP
++Clinical Director will conduct weekly audits to ensure all MTP/ITPs remain in compliance with standards.
++Clinical Director to provide weekly audit report to VP as evidence of compliance.

Completion Date: *03/04/2022*

2. Requirements

Description of Violation

Child 1's record does not reflect that reasonable efforts were made by the facility to involve interested parties for the ISP meetings during admission .
Child 2's record does not reflect that reasonable efforts were made by the facility to involve interested parties for the ISP meetings during admission .
Child 3's record does not reflect that reasonable efforts were made by the facility to involve interested parties for the ISP meetings during admission .
Child 4's record does not reflect that reasonable efforts were made by the facility to involve interested parties for the ISP meetings during admission .
Child 5's record does not reflect that reasonable efforts were made by the facility to involve interested parties for the ISP meetings during admission .

POC Submission ***Accept***

++Primary therapist is responsible for notifying parents of upcoming ISP/MTP planning session
++Parents and other interested parties will be given an invite in person or via email regarding the ISP/MTP planning date
++Verification of invitation will be uploaded into Best Notes file section by Primary Therapist
++Clinical Director will complete chart audit to validate invites were sent and submit audit report to VP weekly

3800.224 Development of the ISP (continued)

Completion Date: *03/04/2022*

3. Requirements

Description of Violation

The ISPs for child 1 do not contain signatures or evidence of the opportunity to sign the ISP being provided to all parties.
The ISPs for child 2 do not contain signatures or evidence of the opportunity to sign the ISP being provided to all parties.
The ISPs for child 3 do not contain signatures or evidence of the opportunity to sign the ISP being provided to all parties.
The ISPs for child 4 do not contain signatures or evidence of the opportunity to sign the ISP being provided to all parties.
The ISPs for child 5 do not contain signatures or evidence of the opportunity to sign the ISP being provided to all parties.

POC Submission ***Accept***

***Primary therapist is responsible to invite parents and involved parties to the treatment team meeting for participation in care planning*

Parents will be advised of initial treatment plan session in person on day of admission or via email when necessary

Evidence of letter sent/provided will be uploaded in child's medical record.

Parents and students will be given access to Best Notes portal, allowing them to sign off on treatment plans.
Completion Date: *03/04/2022*

3800.226 Content of the ISP

1. Requirements

3800.226. An ISP shall include:

Description of Violation

The ISP for child 1 did not contain goals that were measurable, attainable, time bound and specific which include one goal addressing education and one addressing the family .
The ISP for child 2 did not contain goals that were measurable, attainable, time bound and specific which include one goal addressing education and one addressing the family .
The ISP for child 3 did not contain goals that were measurable, attainable, time bound and specific which include one goal addressing education and one addressing the family .
The ISP for child 4 did not contain goals that were measurable, attainable, time bound and specific which include one goal addressing education and one addressing the family .
The ISP for child 5 did not contain goals that were measurable, attainable, time bound and specific which include one goal addressing education and one addressing the family .

POC Submission ***Accept***

++Embark at the Poconos utilizes a Master Treatment Plan to meet the requirements of the ISP.
++ Multiple, evidenced based assessment tools are administered at time of admission and throughout treatment to objectively measure progress including YOQ-2.0SR, YOQ-2.01, OQ-45.2, PHQ-9, GAD-7, FAD-GF, ACEs and CRAFFT
++Treatment Plan is completed within 7 days of admission
++Educational Goals are added via an Addendum format
++Family Goals are identified as Caregiver problem areas
Completion Date: *03/04/2022*

3800.228 Copies of the ISP

1. Requirements

3800.228.b. Copies of ISPs, revisions to the ISP and monthly documentation of progress shall be kept in the child's record.

Description of Violation

Child 1's record does not include copies of ISPs, revisions to the ISP and monthly documentation of progress.
Child 2's record does not include copies of ISPs, revisions to the ISP and monthly documentation of progress.
Child 3's record does not include copies of ISPs, revisions to the ISP and monthly documentation of progress.
Child 4's record does not include copies of ISPs, revisions to the ISP and monthly documentation of progress.
Child 5's record does not include copies of ISPs, revisions to the ISP and monthly documentation of progress.

POC Submission ***Accept***

++MTP/ISP's are reviewed and updated weekly
++Progress to goals are to be clearly documented
++Primary therapist is responsible to assure all requited elements are present in the MTP/ISP reviews
++Clinical Director will conduct weekly audits to ensure all MTP/ITPs reviews remain in compliance with standards.
++Clinical Director to provide weekly audit report to VP as evidence of compliance.
Completion Date: *03/04/2022*

2. Requirements

Description of Violation

There is no record for the ISP for child 1 was provided to all parties who participated in the development and revisions to the ISP.
There is no record for the ISP for child 2 was provided to all parties who participated in the development and revisions to the ISP.
There is no record for the ISP for child 3 was provided to all parties who participated in the development and revisions to the ISP.
There is no record for the ISP for child 4 was provided to all parties who participated in the development and revisions to the ISP.
There is no record for the ISP for child 5 was provided to all parties who participated in the development and revisions to the ISP.

POC Submission ***Accept***

++Parents and students are provided with an access code for Best Notes
++Parents and Students are instructed on use of BN electronic signature function
++Primary therapist is responsible to follow-up with parents and students after treatment team session to assure they have reviewed and electronically signed the ISP/MTP
++Email versions will be sent to all other involved parties by the Primary Therapist and evidence of same will be uploaded into Best Notes files.
++Clinical Director is responsible to ensure all appropriate signatures are in place via weekly audit process
Completion Date: *03/04/2022*

3800.229 Education

1. Requirements

3800.229. Under 22 Pa. Code Chapters 11, 14 and 15 (relating to student attendance; special education services and programs; and protected handicapped students), each child who is of compulsory school age shall participate in a Department of Education-approved school program or an educational program under contract with the local public school district.

3800.229 Education *(continued)*

Description of Violation

Child 2's record did not include a copy of the Admission to Facility form dated within 24 hours of admission,
Child 3's record did not include a copy of the Admission to Facility form dated within 24 hours of admission,
Child 4's record did not include a copy of the Admission to Facility form dated within 24 hours of admission,
Child 5's record did not include a copy of the Admission to Facility form dated within 24 hours of admission,

POC Submission ***Accept***

***Notification Form is sent by the Academic Coordinator on the day of admission*
***Clinical Director will audit new admission charts weekly to assure compliance with this requirement*
*** Examples of recently completed forms attached*
Completion Date: *03/01/2022*

3800.243 Content of Records

1. Requirements

3800.243. Each child's record shall include:
1. Personal information including:
   iii. The dated photograph of the child taken within the past year.

Description of Violation

The records for children 1, 2,3, and 5's did not contain identifying personal information such as a dated photograph.

POC Submission ***Accept***

++Admin Assistant is responsible to take current photo of student and upload into Best notes
++Clinical Director will audit records to assure compliance with this standard
++Clinical Director will submit audit report to VP to demonstrate compliance withthis standard
Completion Date: *03/04/2022*

Clearances

1. Requirements

6344.b. Administrators of child-care services shall require applicants to submit with their applications the following information obtained within the preceding one-year period:
1. Pursuant to 18 Pa.C.S. Ch. 91 (relating to criminal history record information), a report of criminal history record information from the Pennsylvania State Police or a statement from the Pennsylvania State Police that the State Police central repository contains no such information relating to that person. The criminal history record information shall be limited to that which is disseminated pursuant to 18 Pa.C.S. § 9121(b)(2) (relating to general regulations)
2. A certification from the department as to whether the applicant is named in the central register as the perpetrator of a founded report of child abuse, indicated report of child abuse, founded report for school employee or indicated report for school employee
3. A report of Federal criminal history record information. The applicant shall submit a full set of fingerprints in a manner prescribed by the department. The Commonwealth shall submit the fingerprints to the Federal Bureau of Investigation in order to obtain a report of Federal criminal history record information and serve as intermediary for the purposes of this section.

Description of Violation

Staff member A was hired on [redacted] and did not obtain required PSP clearances until [redacted]
Staff member B was hired on [redacted] and did not obtain required FBI and child abuse clearance until [redacted] and3/15/21.
Staff member C was hired on [redacted], and did not obtain FBI clearance until [redacted]

Clearances (continued)

Staff member D was hired on [redacted], and did not obtain FBI clearance until [redacted]
Staff member F was hired on [redacted], and did not obtain [redacted] clearances prior to hire.
Staff member H was hired on [redacted], and did not obtain PSP clearance until [redacted]
Staff member I was hired on [redacted], and did not obtain [redacted] prior to hire.
Staff member K was hired on [redacted] and did not obtain [redacted], and child abuse clearance 4[redacted] prior to hire.
Staff member L was hired on [redacted] and did not obtain PSP clearance until [redacted].
Staff member M was hired on [redacted], and did not obtain [redacted], and [redacted] clearances prior to hire.
Staff member U was hired on [redacted] and did not obtain Child abuse [redacted], and [redacted] clearances prior to hire.
Staff member V was hired on [redacted], and did not obtain PSP clearance [redacted].
Staff member W was hired on [redacted], and did not obtain [redacted], and child abuse [redacted] clearances prior to hire.
Staff member X was hired on [redacted] and did not obtain [redacted] clearances prior to hire. There was also no child abuse clearance found in Staff X's file.
Staff member Y was employed by facility [redacted] and did not have Child Abuse and FBI clearance on file.
Staff member Z was employed by the facility [redacted], there was no record of FBI clearance on file.
Staff member AA was hired on [redacted] and did not have FBI clearance done until [redacted]
Staff member AC was hired on [redacted] and did not have required PSP clearance completed until [redacted].

POC Submission ***Accept***

***Moving Forward, no employee will begin employment prior to all required clearances being on file.*
***Human Resource generalist will assure all required paperwork is on file before finalization of start date.*
*** Hiring manager is responsible to review all pre-hire paperwork with HR Generalist and will give approval for hire date only after validating all required clearances are on file.*
Completion Date: *02/28/2022*

Mandated Reporter Training

1. Requirements

6383.c.3. Employees who have direct contact with children and foster parents shall receive three hours of training within six months of the issuance of a license or approval certificate and three hours of training every five years thereafter. New employees and new foster parents shall receive three hours of training within 90 days of hire or approval as a foster parent and three hours of training every five years thereafter.

Description of Violation

Staff person A, H, I, L, M, O, U, AA, AB, and AC did not complete the mandated reporter training within the first 90 days of employment.

POC Submission ***Accept***

++Mandated reporter training is part of the initial training requirements for all mew staff
++Staff are assigned to the training by the HR team
++Hiring manager/supervisor are responsible to assure compliance with this regulation
++Staff who have not completed the training within 90 days of hire will not report to work until training is complete
Completion Date: *03/04/2022*