



Pennsylvania
Department of Human Services
Office of Children, Youth, and Families

11/13/2024

[REDACTED]
The Clock Tower Schools
[REDACTED]

RE: Pride Hall
185 Glen Mills Road
Glen Mills, Pa, 19342
License/Coc#: 149860

Dear [REDACTED]

As a result of the Pennsylvania Department of Human Services, Office of Children, Youth and Families, Southeast Region licensing inspections on 05/06/2024 and 07/12/2024, 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.

Continued compliance with Department statutes and regulations must be maintained.

Sincerely,

[REDACTED]

Enclosed:
LIS

LICENSING/APPROVAL/REGISTRATION INSPECTION SUMMARY

NAME OF AGENCY/FACILITY: Pride Hall License # 14986				TELEPHONE: [REDACTED]	OCYF REGIONAL STAFF APPROVAL	DATE
ADDRESS: 185 Glen Mills Road Glen Mills, PA 19342				COUNTY: Delaware	[REDACTED]	08/23/24
INSPECTED BY: [REDACTED]				INSPECTION DATE(S): 05/06/2024; 07/12/2024	[REDACTED]	8/23/24
INITIAL INSPECTION	RENEWAL INSPECTION	COMPLAINT	UNANNOUNCED INSPECTION	RANDOM SAMPLE		
		X				

The Department of Human Services, Southeast Regional Office of Children, Youth and Families conducted an inspection of Pride Hall as a result of a CPS complaint filed on 06/06/2024. The following was discovered as a result of this investigation.

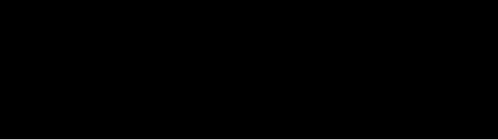
The Office of Children, Youth and Families utilized the licensing tool for Title 55 of Pennsylvania Code Chapter 3800 – Child Residential and Day Treatment Programs which includes applicable regulations from Chapter 3490 - Child Protective Services and 55 PA Code 20 Licensure and Approval of Facilities and Agencies. The following regulatory violations were identified. The Office of Children, Youth and Families will issue the following citations which require a plan of correction to be submitted by DHS within 10 days of receipt of this Licensing Inspection Summary.

1. 55 PA CODE CHAPTER	2. NON-COMPLIANCE AREA	3. CORRECTION REQUIRED	4. REQUIRED CORRECTION DATE	5. PROVIDER'S PLAN OF CORRECTION OR RESPONSE	6. STATUS OF CORRECTION
3800.53(b). The director shall be responsible for administration and management of the facility, including the safety and protection of the children, implementation of policies and procedures and compliance with this chapter.	During the investigation, the director did not disclose all the information regarding the incident to the chain of command. Additionally, the Director informed staff not to report or discuss this incident. The actions of the Director places the facility in violation of reporting incident through the proper chain of command and disclosing all relevant information.	Please specify the steps taken to ensure full and complete accounting and transparency regarding incidents. How will the facility assure that a culture of openness, honesty and transparency is maintained.	08/23/2024	Please see ATTACHMENT A	Accepted 08/23/2024
3800.147(a). Use or possession of tobacco products by children is prohibited.	On 06/03/2024, Child A was found with [REDACTED] in the facility. Child A had in [REDACTED] possession a [REDACTED] which was passed to [REDACTED] through the [REDACTED] by an unauthorized visitor. Facility personnel did not follow facility policy in allowing the visitor and did not use reasonable judgement in securing the [REDACTED] to reduce the passing of contraband.	Facility to provide policy regarding approved/unapproved/unauthorized visitors, as well as steps taken to ensure prohibition of the passing of contraband through use of public facilities/ visitation.	08/23/2024	Please see ATTACHMENT B	Accepted 08/23/2024

20.11. In addition to complying with the procedural regulations set forth in this chapter, the legal entity shall comply with the Department's program licensure or approval regulations for the particular type of facility or agency which the legal entity operates.	Due to the actions of staff person B in not disclosing all of the information relating to the contraband and how it was brought into the facility, as well as the actions of Staff Person B in informing the staff person (C, D) not to report or discuss the incident, it is determined that the administration of the facility did not comply with the intent of 55 PA Code Chapter 20 and was responsible for perpetuating gross incompetence negligence or misconduct in operating the facility as well as perpetrating fraud or deceit in obtaining or attempting to obtain a certificate of compliance.	How is the facility ensuring that all issues are communicated to the chain of command with honesty and transparency? What steps has the facility taken to create an honest working environment which is protective of the safety and welfare of the children, and which promotes an atmosphere of mutual support, trust, and respect with facility staff and regulatory compliance?	08/23/2024	Please see ATTACHMENT C	Accepted 08/23/2024
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THE LEGAL ENTITY REPRESENTATIVE MUST COMPLETE COLUMN 5, SIGN ON THE SIGNATURE LINE AT THE BOTTOM AND DATE ALL PAGES OF THIS DOCUMENT.
REGIONAL OFFICE BY: 08/23/2024

			
VE		TITLE	
8/23/2024			
DATE		TELEPHONE NUMBER	



53b Plan of Correction

The Clock Tower Schools understands the importance of 3800.53b and has zero tolerance for misconduct from the [REDACTED] (Staff Member B). The [REDACTED] (Staff Member A) of the organization took swift and decisive action in separating the employment of Staff Member B, (in less than 24 hours) after [REDACTED] learned of actions that were inconsistent with the organization's fundamental values. Staff Member B worked for The Clock Tower Schools for under [REDACTED] year and was vetted significantly prior to hire. Despite a [REDACTED] in [REDACTED], [REDACTED] Staff Member B's actions did not represent the integrity expected based on [REDACTED] background, education, and the 68+ hours of training received from The Clock Tower Schools.

While there are no reporting and/or recording requirements for contraband through the Department of Human Services, Staff Member B was in direct violation of The Clock Tower Schools' organizational policies, by not reporting the contraband to [REDACTED] supervisor and informing a staff member not to report or discuss the issue.

Prior to the Department distributing this violation via the LIS, The Clock Tower Schools had already taken several significant steps before the August 9, 2024 notification of this violation. The significant steps taken, related to this isolated incident, are to ensure there is complete accounting and transparency related to incidents. Staff Member A and the Leadership Team are responsible for the implementation of every aspect of this plan of correction. The steps taken are as follows:

- As on [REDACTED], the employment of [REDACTED] (Staff Member B) was ended with The Clock Tower Schools within 24 hours after Staff Member A was informed about the issue.
- Staff Member C received a written reprimand for not logging [REDACTED] recovery of the [REDACTED] (See **Appendix A**).
- On June 10, 2024 an email was sent to all facility supervisors expressing the importance of being vigilant, exercise situational awareness, and sharing information (See **Appendix B**)
- On July 8, 2024, The Clock Tower Schools' whistleblower policy (3.18) was redistributed to all employees of the organization (See **Appendix C**)
- By July 17, 2024 all Clock Tower Schools employees received a booster training in Search and Seizure, which includes training on the proper reporting internally and externally (if required) and emphasized the complete accounting and transparency related to incidents. (See **Appendix D** for training verifications)
- On August 20, 2024 the Executive Director met with all employees of The Clock Tower Schools and discussed the importance of protecting the organization and those within its care through transparency, information sharing, openness, and integrity. The Executive Director reaffirmed [REDACTED] open-door policy and made sure each employee had [REDACTED] personal cell phone number, to continually foster an atmosphere which promotes transparency, trust, and respect.