

**PREA AUDIT:
AUDITOR'S FINAL SUMMARY REPORT
JUVENILE FACILITIES**



Name of Facility: Adelphoi Village: Raphael			
Physical Address: 1114 Main Street, Latrobe, Pa. 15650			
Date report submitted: July 28, 2015			
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Date of facility visit: June 1,2,3,4,2015			
Facility Information: Adelphoi Village: Raphael			
Facility Mailing Address: same as above (if different from above)			
Telephone Number: 724-537-0370			
The Facility is:	<input type="checkbox"/> Military	<input type="checkbox"/> County	<input type="checkbox"/> Federal
	<input type="checkbox"/> Private for profit	<input type="checkbox"/> Municipal	<input type="checkbox"/> State
	xx <input type="checkbox"/> Private not for profit		
Facility Type:	<input type="checkbox"/> Detention	<input type="checkbox"/> Correction <input type="checkbox"/> XXX Other: Juvenile Treatment Facility	
Name of PREA Compliance Manager: Stephen Hall		Title: Raphael Supervisor	
Email Address: Stephen.hall@adelphoi.org		Telephone Number: 724-537-0370	
Agency Information			
Name of Agency: Adelphoi Village			
Governing Authority or Parent Agency: (if applicable) na			
Physical Address: 1119 Village Way, Latrobe, Pa. 15650			
Mailing Address: (if different from above) s/a			
Telephone Number: s/a			
Agency Chief Executive Officer:			
Name: Nancy Kukovich		Title:	President/CEO
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Agency Wide PREA Coordinator**Name:** Jennifer McClaren**Title:**

Quality Assurance Director

Email Address: Jennifer.mcclaren@adelphoi.org**Telephone**

s/a

Number:**AUDIT FINDINGS****NARRATIVE:**

Adelphoi Village came into existence in 1971 when Fr. Paschal Morlino, a Benedictine monk, set out with a plan to open a home for boys. This program, which he called Adelphoi, is Greek for "my brothers for whom I am concerned". In 1978, foster care was added, followed by a private academic school in 1981. Today, Adelphoi provides an extensive network of community-based programs and services to over 1,200 youth and families on a daily basis. Group homes, foster/adoptive care, a charter school, in-home services such as multisystemic therapy, education programs, mental health services, secure care and other services overlap to provide a complete continuum of care to children, youth and families. In 2014, Adelphoi served 1137 youth and families. Anchored by a 20-acre campus in Latrobe that includes a school building, administration building, three secure units, a substance abuse residential facility, two sex offender group homes, and a multipurpose recreational center, Adelphoi has program sites in over 30 counties throughout Pennsylvania. The counselors, teachers, and therapists, along with administrative and supervisory staff, make up a workforce of nearly 650. There are 12 employees of Raphael including a Caseworker and the Supervisor/PREA Manager. Line staff work rotating first and second shifts. Third shift personnel work permanent 3rd, with rotating days off.

Adelphoi Village is a component of Adelphoi U.S.A. The juvenile residential component is comprised of 21 group homes of which 5 are female, and the rest are male. These units are located in Westmoreland, Blair, Fayette, Lycoming, Somerset and Armstrong Counties. A previous Audit of the 6 units on the main campus was conducted in August 2014. A subsequent Audit of four off campus units was conducted in April 2015. This Audit was conducted at Raphael, Latrobe, Derry Township, Westmoreland County, Pa., about 10 minutes from the main campus in Latrobe. Four other residential units were also audited at this time. Raphael is a 15 bed male sex offender program, with ages ranging from 12-18, and licensed under the Pa. Dept. of Public Welfare 3800 regulations. In 2014, there were 27 admissions and the average length of stay was 5.4 months. On the date of the Audit there were 14 residents in this unit; including one Diagnostic resident and boys who have "stepped down" from the Boy's Secure Sex Offender program on the main campus. Residents from Raphael are transported to the central Latrobe campus to attend the Robert Ketterer Charter School on the main campus. They are transported there in a van by Adelphoi staff. They eat all of their meals on the main campus. These residents can be either dependent or delinquent and are committed by the Juvenile Court. In addition to education, all residents receive both individual and group counseling and family counseling if warranted. They also perform community service. Adelphoi contracts with 64 of the 67 Counties in Pa. and infrequently has had children committed from Delaware, West Virginia, Maryland, Nebraska, and Ohio. Because Adelphoi Village offers both foster care and adoption services, children from 0-21 are served. Adelphoi is considered a juvenile treatment facility and has a large sex offender population. Adelphoi Village has undergone training in the Sanctuary Model over the past three years and received their certification this year. Sanctuary is the Organizational Culture and Philosophy at Adelphoi.

DESCRIPTION OF FACILITY CHARACTERISTICS: Raphael is located in a residential neighborhood in the outskirts of the town of Latrobe, Pa in Derry Township, Westmoreland County in Western Pa. This two story 5000 square foot former funeral home is owned by Adelphoi and sits on about 1.5 acres with a driveway and a basketball court. It is a beautiful building sitting atop a small hill with a large front porch. Private homes surround it. Raphael was renovated in 2012. The main living floor was opened up to improve line of sight and supervision. Bedrooms were repositioned to improve supervision during sleeping hours. A motion map monitoring system was installed in the bedrooms, and is activated and monitored by staff during sleeping hours. When you enter the front door, a supervisor's office is to the left, a stairway directly ahead, and staff and a caseworker office to the left. The doors are locked and there are delayed panic bars on them from the inside. A hallway leads to a kitchen, pantry, living room, dining room, and a small deck to the side of the home. There is one first floor staff bathroom. There is another stairway in the rear of the home that leads down to the basement. The basement has food storage, mechanical, laundry rooms and a large recreation room that can be used for group counseling and a weight room. The second floor can be accessed by both front and back stairways. The front stairs lead directly to a hallway to an open staff area. The bedrooms: 2 Quads, 2 Doubles and 3 singles are configured around the open staff area, where there is a desk, so that midnight staff can monitor the motion mapping system in the multi resident rooms. Directly across from the staff post are two bathrooms. The sinks are in the open area, one next to another and the bathrooms with a toilet and shower stall are across from each other next to the sinks. This is a well-designed bathroom area that allows privacy for the boys but can be effectively monitored by staff. The bedrooms are sparsely furnished with wooden single and bunk beds. The third floor is only accessible to the Information Technology/Computer staff. It is padlocked off and once contained a separate apartment prior to Adelphoi purchasing it. The boys were at school on the main campus during the tour; only the supervisor was present. The residential clients attend school in part of the building and eat in a separate area of the cafeteria, separate from the children from the community who attend the Alternative School. I toured this school building during a previous audit, and a staff person working for the Auditor toured it again on 6-1-15. On 6-3-15, the residents were observed as a group at the school during lunchtime. Interviews of both staff and children were conducted in the administration building across the parking area from the school.

SUMMARY OF AUDIT FINDINGS:

The audit was conducted on June 1,2,3,4, 2015, in conjunction with Audits of 4 other Units. An additional staff person, trained and contracted by the Auditor was used to help conduct interviews of both residents and random staff. The Audit commenced with a brief entrance interview with the Vice President of Residential Services and the PREA Coordinator at the Administration Building in Latrobe. The tour of Raphael took place on June 1, 2015. The residents were at school during the tour and all but the Unit supervisor were with the residents at the school. Raphael is newly remodeled and well maintained. On June 2, 3, 4, I returned to the main campus to conduct interviews. I interviewed the following: CEO, Vice President of Residential Services, PREA Coordinator, PREA Manager/Supervisor for Raphael, the Program Director for this Unit, a Registered Nurse, a Master's Level Therapist, a Caseworker, a phone interview with a Volunteer and a Contractor, an Intake staff, a teacher, Random Staff (9) from all three shifts, (there are 12 total employees at Raphael, including the Supervisor and Caseworker and one line staff was on vacation) and 10 Residents.

Residents have several means to contact independent agencies to report instances of sexual abuse and/or sexual harassment. One is a "Hotline" to the Blackburn Center, a 24 hour hotline for crisis support and a Rape Crisis Center. There is a dedicated button on the phone that goes directly to a crisis counselor at the Blackburn Center. This phone is located in the supervisor's office. There are posters regarding reporting, zero tolerance, and knock and announce throughout the house. This information is included in the PREA Orientation resident handbooks. The video watched by the residents during Intake, also advises them about the Hotline. Also posted are the numbers for Child Line, another 24 hour reporting line run by DPW for any sort of alleged abuse. Additionally, addresses were posted for the Blackburn Center directly above the Phone. I spoke to a staff person at the Blackburn Center prior to the on-site Audit and they confirmed the services offered in the MOU, and stated they were not aware of any allegations of sexual abuse or harassment. Residents also have a grievance process for reporting, as well as journaling with staff. Standard #351, Resident Reporting, has been exceeded, because every possible avenue, including a "hotline", addresses, grievances, phone calls to parents, POs, Caseworkers, Attorneys, visiting, home visits, journaling and verbal reports have been provided. Posters in both Spanish and English detailing how a third party can report sexual abuse are posted in the areas where parents would visit.

Of particular note, is the assessment and treatment that is offered to the residents who are victims or perpetrators of sexual abuse. This is a treatment facility and a sex offender unit. All residents at Raphael receive specialized and intensive treatment. They are sent to Raphael by the Courts for this reason and therefore Adelphoi exceeds the PREA standard #383. Standard #315 is also exceeded. Supervision is well above the mandated ratio of both the standard and by the DPW 3800 regulations. The dynamics of the resident population are evaluated on a regular basis, sometimes daily, to ensure adequate supervision of a child. If a child is placed on a safety plan, for a variety of reasons, supervision of that child is many times "one on one". The design of the second floor and the motion mapping system enhance the supervision of these residents. Employee Training, Standard #331, exceeds the Standard. All employees receive PREA training as part of their orientation process. They have also received refresher training this year. Staff at Raphael receive additional and specific training regarding sex offenders. They receive this specialized training as part of their orientation or if they transfer from another unit. All staff were well versed in their responsibilities and could spontaneously discuss first responder actions.

There have been no allegations of sexual abuse or sexual harassment in the past 12 months. Twelve resident files and 12 staff files were reviewed, for documentation for various standards. There were no LGBTI identified residents in the population at Raphael during the time of the on-site Audit.

Upon completion of the on-site portion of the Audit, an exit interview was conducted with 11 Administrators and upper level staff. Requested additional documentation for the following standards must be submitted to the Auditor for verification within 30 days of this Interim Report. Standard #317 requires that all staff have background checks and child abuse clearances. Pa. DHS BHSL cited Raphael because one of their staff did not have clearances in a timely manner. A plan of correction was submitted to BHSL and Adelphoi is waiting to hear if it is acceptable. When they receive this notification they will submit it to the Auditor. Documentation of the Acceptance of the Plan of Correction by Pa. Bureau of Human Services Licensing was provided to me, therefore, Standard #317 has been met. Standard #333 requires that when children are transferred from facility to facility within the agency they must be re-educated. This is in policy, but review of files shows that it is not always in practice. Documentation of the timely education of transfers needs to be submitted. Documentation of timely Education of "transfers" within the agency was provided to me, so Standard # 333 has been met. Standard #334 requires the proper use of Miranda warnings if administrators are conducting interviews. Because Adelphoi administrative staff and supervisors have completed the Specialized Training for Investigators and do conduct Administrative Investigations, the Human Resources Department, along with the law department is preparing a policy for the proper use of Miranda rights. This will be submitted upon completion. A memo from the Vice President of Residential Services and an amendment to the PREA policy was submitted to me. Both of these documents clarify the role that Administrators will take so as not to interfere with Investigations by the appropriate agencies. This documentation meets Standard #334. Raphael meets all PREA Standards and exceeds in four areas as noted above. Agency Policy and Procedure comply with standards.

Number of standards exceeded: 4

Number of standards met: 37

Number of standards not met: 0

Standard 115.311 Zero Tolerance of Sexual Abuse and sexual harassment; PREA coordinator

- Exceeds Standard (substantially exceeds requirement of standard)
- xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

An agency wide PREA coordinator and a PREA Manager are designated and I interviewed the PREA Coordinator and PREA Manager, who is the Supervisor of Raphael. There is an appropriate Zero tolerance policy in place.

Standard 115.312 Contracting with other entities for the confinement of residents

- Exceeds Standard (substantially exceeds requirement of standard)
- xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments including corrective actions needed if does not meet standard

NA -Facility does not contract with other entities for confinement of residents

Standard**115.313 Supervision and Monitoring**

- xxx** Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Staffing ratios not only supersede PREA Standard, they also supersede Pa. DPW 3800 regulations regarding mandated ratios. There are always two staff on midnight shift and I saw where they are posted when the residents are sleeping. Random unannounced rounds are conducted on all three shifts, by both the Unit Supervisor and the Program manager. I was provided logs of these rounds. I also interviewed them to confirm that rounds were random and unannounced. There were no cameras. Staffing is reviewed regularly to take into account the resident population and the group dynamics.

Standard**115.315 Limits to Cross Gender Viewing and Searches**

- Exceeds Standard (substantially exceeds requirement of standard)
- XXX** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

There are currently no Transgender or Intersex Youth in the Population, but all staff have been trained on how to provide a search of such a resident in a dignified and appropriate manner. There is a Gender Variant Search Form. There are no cross gender searches of any kind conducted. During the tour, postings are at the bottom of the stairways leading to the second floor reminding staff to knock and announce. All children shower separately and interviews with both random staff (9) and random residents (10) confirm compliance with this standard. There are only male staff on this unit, but females can fill in.

Standard	115.316 Residents with disabilities and residents who are limited English Proficient
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- Exceeds Standard (substantially exceeds requirement of standard)
- xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Children who are not English proficient are not accepted into the Adelphoi program, because they could not participate in treatment. However parents sometimes do not speak English. I have requested that Spanish language reporting posters be placed in visitation areas. Documentation of this was provided to me prior to the conclusion of the on-site portion of the Audit. Translators are available as needed. Children with disabilities are accepted on a case by case basis if reasonable accommodations can be made. Resources for these children are provided if needed.

STANDARD 115.317 Hiring and Promotion Decisions

- Exceeds Standard (substantially exceeds requirement of standard)
- XXX** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Both policy and practice is compliant with this standard as well as the Pa. Child Protective Services Law. I reviewed 12 staff files and all clearances were in place. Policy has been updated to comply with the revision in the Pa. CPSL and requires updated clearances every three years. I also reviewed three files of staff recently hired within the past year and all but one had appropriate clearances. One staff person who previously worked at Colony but was transferred to Raphael, did not have his Child Abuse Clearance in a timely manner. BHSL cited Raphael for this. A plan of correction was submitted to them and Adelphoi is waiting for a response from them, that it is acceptable. When they receive this and submit it to the Auditor, they will be in compliance with this standard. No staff will start until those clearances are in hand. Both a volunteer's and a contractor's file had the appropriate clearances. I interviewed the Vice President for Human Resources and he confirmed Policy and Practice. I received documentation that the Pa. Bureau of Human Services Licensing has accepted the plan of correction, therefore Raphael is fully compliant with this Standard.

STANDARD 115.318 Upgrades to Facilities and Technologies

- Exceeds Standard (substantially exceeds requirement of standard)
- ~~xxx~~ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Raphael was renovated in 2012. Notes from the President of Residential Services confirmed the opening up of the first floor to improve line of sight and supervision. The bedrooms on the second floor were repositioned to improve supervision during sleeping hours. A motion map monitoring system was installed in the bedrooms that is activated during sleeping hours. Most notable is the bathroom configuration that allows privacy for the residents, but allows for close supervision by staff. I viewed all of this during the on-site tour.

STANDARD 115.321 Evidence and protocol and forensic medical examinations

- Exceeds Standard (substantially exceeds requirement of standard)
- ~~Xxx~~ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Adelphoi Village only conducts Administrative Investigations. Several staff have completed the Investigative Training Curriculum. I interviewed both the Vice President of Residential Services and the Program Director. Both Child Line and the Pa. State Police conduct any abuse or criminal investigations. They follow accepted protocol. Forensic medical examinations are conducted under agreement by the local Medical Center who employ both SANEs and SAFEs in their Emergency Room. A MOU is in place for both the police and the medical agency. Interviews with Medical Staff confirm compliance with this standard.

STANDARD 115.322 Policies to ensure referrals of allegations for investigations

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

There have been no allegations of sexual abuse or sexual harassment. The policy requires reporting and all staff are mandated reporters. The training that the staff receive is comprehensive and all staff interviewed (9) were able to spontaneously discuss the reporting policy and their mandated reporter responsibilities. All allegations are referred to Child Line and the PSP.

STANDARD 115.331 Employee training

- XXX** Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

I reviewed 16 files and interviewed 9 random staff, and a teacher, and they were all trained and understood their responsibilities. I saw logs of all staff training. (A log reflects both completion of and understanding of the material, because an employee must receive a passing grade on a post test to be added to the log). I reviewed the curriculum. It contains all areas that are mandated by the standards. PREA training is part of new staff orientation training. Several staff have also received refresher training this year and PREA updates are presented at weekly staff meetings. Staff at Raphael receive additional and specific training regarding sex offenders prior to working in the unit. This standard has been exceeded.

STANDARD 115.332 Volunteer and Contractor Training

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

I interviewed by phone a volunteer and saw the sign off that she received appropriate training. She was able to tell me when she received the training, what it consisted of and who she would report any suspicion or allegation of sexual abuse to. I also interviewed by phone a contracted employee, who works in the Admissions department and I saw the sign off for her education. She too, was able to describe her training and her responsibilities.

STANDARD 115.333 Resident Education

- Exceeds Standard (substantially exceeds requirement of standard)
- XXX** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

All children in Raphael have received education. They receive both the 72 hour and 10 day education at Intake, on the Main Campus. I interviewed a staff person in Admissions who educates the residents within 72 hours and has them sign off that they received the training. Of the 12 files I reviewed, two residents admitted since PREA was implemented in July 2014 did not receive education in a timely fashion. One was a transfer from another Adelphoi facility, where they had received Education at Intake. Changes have been made to the procedure, so that the Caseworker will educate the children within 24 hours upon arrival at Raphael. Documentation of this new procedure and evidence of transfers receiving education have been provided to me within 30 days of this Interim report and then they are in compliance with this standard. Adelphoi has included PREA information in the resident handbooks. In addition to the written information, the residents watch an age appropriate video and sign off that they have received the information on zero tolerance and PREA. I reviewed the files of 12 residents and saw the sign off sheets. Ongoing education is provided through postings and also as part of one of the Cognitive Behavioral Groups.

STANDARD 115.334 Specialized Training: Investigations

- Exceeds Standard (substantially exceeds requirement of standard)
- XXX** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

I received the log as to who attended the investigative training, during the pre-audit period, and I received the curriculum. The staff only conduct limited administrative investigations. All criminal investigations are conducted by the Pa. DHS and Pa. BHSL and the PSP. I interviewed both the Vice President of Residential Services and the Program Director, who received the training. I recommended that they contact their solicitor regarding Miranda warnings when interviewing staff. The HR department is consulting with the legal department and a policy regarding the proper use of Miranda rights when conducting Administrative Investigations will be issued. When submitted to and verified by Auditor, they will be in compliance with this standard. They currently use them with residents. All "Investigators" and Unit Supervisors were issued a memo advising them of their limited duties as Investigators and the PREA Policy was updated to clarify the responsibilities. This documentation was provided to me. This Standard has been met.

STANDARD 115.335 Specialized Training: Medical and mental health care.

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

I was provided the training that was offered to the Medical and Mental Health Staff. I interviewed a Registered Nurse and a Master's Level Therapist. They have received the specialized training provided by Adelphoi as well as additional outside training. Both were able to answer questions regarding detection and response. They are mandated reporters and as such are aware of those responsibilities. They also receive the training that all staff receive.

STANDARD 115.341 Obtaining Information from residents

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

The objective instrument is used at the time of Intake. It is commonly used and contains all mandated variables that need to be considered. I saw a log that every resident that was admitted since July 2014 has had one administered. These are also administered again at 6 months. I reviewed 12 files and all but one (admitted prior to 7-14) had timely assessments, and several had the second or 6 month assessment. I interviewed the Caseworker who administers these assessments and the 10 random residents that were interviewed confirmed that they had been asked these questions. The Caseworker also receives information from parents, Probation Officers, and others through the Admissions Packet.

STANDARD 115.342 Placement of Residents in housing, bed, program, education and work assignments

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Interviews with the PREA Coordinator and PREA Manager, as well as the Caseworker who administers the assessment show a policy and procedure in place for safety plans that includes housing for those identified as sexually vulnerable, or sexually aggressive. Because this is a sex offender unit, all residents are identified as aggressive because of their charges. One child also identified as vulnerable was placed in a single bedroom. Documentation of this in the staff notes was shown to me. The information from the risk assessment was used to inform a housing decision. The supervisor makes housing decisions for each child based on a variety of variables including the information from the risk assessment. During the tour, I was shown the single room that can be used for risk based housing decisions.

STANDARD 115.351 Resident Reporting

- XXX** Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

The residents can report in several internal ways by journaling staff, the grievance procedure, and/or direct reporting to their therapist during one on one sessions. They can also Child Line or use the phone to the Blackburn Center. This phone has a dedicated button. Residents have frequent calls home, are allowed visits every weekend and provided by the agency once a month if the parents do not have transportation and residents also receive home visits. All random staff (9) and random resident (10) interviews confirm that they know they can report in writing, verbally, anonymously and through third parties. The teacher that I interviewed stated that the children can always report to the teachers when they come to school. This standard has been exceeded. All possible reporting avenues have been provided.

STANDARD 115.352 Exhaustion of Administrative Remedies

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

This is in policy and a grievance procedure is required by the 3800 regulations. I reviewed 12 resident files and all were notified of the grievance procedure and signed off that they had been advised. Parents are also notified of this grievance procedure and their ability to utilize it per regulation.

STANDARD 115.353 Resident Access to outside support services and legal representation

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

There is an MOU with the Blackburn Center. Prior to my on-site visit, I spoke to the staff at the Blackburn Center who confirmed the services offered in the MOU. These services are in the Orientation Packet and are posted above the phone. All children interviewed stated they can contact their lawyers if they wish.

STANDARD 115.354 Third Party Reporting

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

This is in policy, however there have been no incidents. This information is provided to parents/guardians as part of their orientation process and is also posted on the website. I have also requested that reporting posters in Spanish be placed in the visitation areas. This documentation was provided to me prior to the conclusion of the on-site.

STANDARD 115.361 Staff and agency reporting duties

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

All staff know that they are required to report as per the Standard and PA.CPSL. All staff know that they must child line an allegation under penalty of law. The agency is aware of their duty to report and this facility has done so. Interviews with line staff as well as Administrators demonstrate this knowledge and review of the reports from an unfounded allegation confirm it.

STANDARD 115.362 Agency protection duties

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

There have been no incidents where this has been necessary. However it is in policy and interviews with the CEO and Vice President of residential services and the PREA Coordinator and Managers indicate that all are aware of their responsibility. However, isolation is never used.

STANDARD 115.363 Reporting to other confinement facilities

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

There have been no incidents, however it is in policy and an interview with the both the CEO and Vice President of Residential Services, indicate that they know their responsibilities to report to both Child Line and to that agency in a timely fashion.

STANDARD 115.364 Staff first Responder duties

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Random staff (9) interviewed all have been trained and know their first responder duties and could verbalize them. These duties and responsibilities are posted in the staff office. There have been no incidents that required a first responder. Policy and procedure meet this standard and contain all areas necessary.

STANDARD 115.365 Coordinated response

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

A coordinated response is in place in policy, and staff that were interviewed can describe it and who they would contact. It is posted in the staff office. It has not been used for a sexual abuse incident, but it utilized for other incidents.

STANDARD 115.366 Preservation of ability to protect residents from contracts with abusers

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

NA There are no union or bargaining unit contracts. Interview with the CEO confirm that there is no obstacle to protecting residents from abusers. Policy meets standard.

STANDARD 115.367 Agency protection from retaliation

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

I interviewed the PREA Coordinator and the PREA Manager (Raphael Supervisor) who would monitor retaliation. They have many resources to ensure that they could protect a staff or resident from retaliation and would monitor for it for at least 90 days and possibly length of stay. Administrators interviewed would discipline any staff person involved in retaliation. Line staff know they must report it and residents know they have the right to be free from it.

STANDARD 115.368 Post-allegation protective custody

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

The facility does not use isolation for any purpose. Interviews with administrators and Medical and MH staff confirm there is no use of isolation. During the tour of Raphael, I did not see any area where a resident could be isolated. They do have a resource, "intervention" that they could use to separate a victim, if he desires and this involves moving a child or staff to another unit for a short period of time, if need be.

STANDARD 115.371 Criminal and Administrative agency investigations

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

An MOU exists with the Pa. State Police. This is a historic and cooperative relationship. Child Line also investigates any child Sexual abuse allegation. Administrators conduct investigations only to determine if staff actions or violation of policy are responsible for and incident.

STANDARD 115.372 Evidentiary Standard for Administrative Investigations

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

This is in the policy and meets the standard.

STANDARD 115.373 Reporting to Residents

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

The Pa. Department of Human Services sends written notification to both the victim and the facility at the conclusion of an investigation. The policy and procedure are in place and an interview with the Vice President of Residential Services and the Program Director confirms that the standard has been met and the policy and procedure would be followed.

STANDARD 115.376 Disciplinary sanctions for staff

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

There have been no incidents requiring staff discipline. The policy is in place and interviews with the Vice President of Residential Services confirms compliance with this standard.

STANDARD 115.377 Corrective Action for Contractors and Volunteers

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

There have been no incidents that require corrective action for volunteers. The policy meets the standard and an interview with the Vice President of Residential Services confirms compliance.

STANDARD 115.378 Interventions and Disciplinary sanctions for residents

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

There have been no incidents that have required discipline of residents for this type of incident. The policy is in place and meets the standard as well as the Pa. CPSL that prohibits disciplinary action for a report made in good faith. All discipline would be on a case by case basis, consistent with other resident discipline and taking into account several variables including Mental Health, where they are in their therapy, etc.

STANDARD 115.381 Medical and Mental Health Screenings

Exceeds Standard (substantially exceeds requirement of standard)

XXX Meet Standard (requires corrective action)

Does Not Meet Standard

Auditor comments, including corrective actions needed if does not meet standard

I reviewed secondary documentation for residents identified pursuant to #341. I also interviewed the Caseworker, who administers the Vulnerability Assessment and a Registered Nurse and a MH therapist for compliance with this standard. One resident was interviewed who disclosed a previous victimization. He stated he had not been offered follow up services, however a review of his file, showed he was offered them and received them. All residents receive mandatory health screening at Intake and all receive ongoing care and therapy as part of their service plan. There was documentation for all of these residents, because they have all been perpetrators. All are receiving treatment and most have been seen by a psychiatrist. There was documentation of a child who turned down STD testing that was offered.

STANDARD 115.382 Access to emergency medical and mental health services

Exceeds Standard (substantially exceeds requirement of standard)

Xxx Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

There have been no incidents that have required emergency care. I interviewed a Registered Nurse and a MH therapist, who confirm that the policy is in practice and that this care would be immediate, free of charge and consistent with community level of care. There is an MOU in place with a community provider.

STANDARD 115.383 Ongoing medical and mental health care for sexual abuse victims and abusers

- XXX** Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

The facility specializes in sex offender treatment and provides comprehensive care to both victims and offenders. This carries over into the care of all residents and exceeds the PREA standard. This is a residential treatment facility and mental health care is part of every resident’s treatment plan. Children are Court committed to Adelphoi because it is a juvenile treatment facility. Most of the residents at Raphael are seeing a psychiatrist monthly as well as receiving individual, group and family counseling.

STANDARD 115.386 Sexual Abuse Incident Reviews

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

There have been no founded or indicated incidents. I interviewed the Vice President of Residential Services, the PREA Coordinator, and the Program Director, who are on the team and they would consider all the possible precipitating factors in the standard.

STANDARD 115.387 Data Collection

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

The policy meets the standard and an interview with the PREA Coordinator confirmed it.

STANDARD 115.388 Data review for Corrective Action

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

The report will be published in July, which will be one year since the agency has implemented PREA. The policy meets the standard and an interview with the PREA Coordinator confirms it. The CEO states that they are a data driven organization and she would review all reports and present to their Board.

STANDARD 115.389 Data storage, publication, and destruction

- Exceeds Standard (substantially exceeds requirement of standard)
- Xxx** Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

The website has been verified by the auditor and the final report for a previous Audit has been posted. There is a place for the yearly report, which will be approved by the CEO and compiled by the PREA Coordinator, with personal identifiers redacted.

AUDITOR CERTIFICATION:

The auditor certifies that the contents of the report are accurate to the best of his/her knowledge and no conflict of interest exists with respect to his or her ability to conduct an audit of the agency under review.

Maureen G. Raquet

July 28, 2015

Certified PREA Auditor