

**CALIFORNIA DEPARTMENT OF SOCIAL SERVICES
OUT-OF-STATE CERTIFICATION REVIEW
OF
GLEN MILLS SCHOOLS
CONCORDVILLE, PENNSYLVANIA**

BACKGROUND

Facility Information

Glen Mills Schools has one facility located 20 miles southeast of Philadelphia near Concordville, Pennsylvania. The facility has a capacity of 1,022 youth between the ages of 15 to 18 and 97 California youth at the time of the certification visit. The facility has a total of 240 direct childcare staff that includes Counselor/Teacher, Senior Counselor and Team Leader.

Support Services

Glen Mills is licensed as a residential child care facility by the Office of Youth and Families (Southeastern Region), Department of Public Welfare, Commonwealth of Pennsylvania.

There are local Child Protective Services offices located throughout the state of Pennsylvania. However, these local offices are not allowed to investigate any complaint from a contracted facility for that particular county. Therefore, many complaints regarding Glen Mills are investigated by the state office of Public Welfare in Philadelphia of which licensing is a part. All of the facility complaints are also investigated by Public Welfare and a staff member who is assigned to Glen Mills reviews all of these incidents with the Glen Mills administrative staff on a quarterly basis. The Public Welfare worker reported that there have been 10-12 complaints regarding Glen Mills since she took over the assignment in November 1998.

All complaints come into the ChildLine, a 1-800-telephone number, in Harrisburg, Pennsylvania. The complaints are then routed to the specific region that will investigate the complaint. These offices investigate CPS complaints that include allegations of abuse or neglect whether in a family home or a facility. All complaints other than CPS complaints are referred to as "Unusual Incidents" and complaints about a facility fall into this category.

A criminal record clearance and fingerprinting is required in Pennsylvania on all childcare staff. Fingerprinting was not required until 1987. The criminal record information is returned directly to the facility. The individual cannot work unsupervised until the criminal record is found to be clear. The licensing

evaluator reported that the facility is subject to penalty if an individual is found working after the facility learned of a conviction and failed to terminate the staff member. Fingerprinting is sent through a FBI clearance if a newly hired staff has lived out of the state for the past year. The criminal record clearances were found in the staff files at Glen Mills.

California Placing Agencies

The seven county probation departments that currently have youth placed at Glen Mills are Marin, Sacramento, San Bernardino, San Francisco, San Joaquin, Santa Clara, and Tulare.

GLEN MILLS SCHOOLS PROGRAM STATEMENT

The following summarizes the Glen Mills Program Statement.

Youth Served

The program statement indicates that Glen Mills Schools serves boys between 15 and 18 years of age. The facility wants candidates from agencies dealing with male delinquents with an IQ of 70 or higher. Glen Mills is prepared to deal with hard-core, aggressive, hostile youth, socially maladjusted, but considered healthy from an emotional standpoint. The program is designed to treat youth who have committed offenses against persons and property, have drug and/or alcohol related offenses, and youth who have used weapons.

Glen Mills will not accept youth who are severely emotionally disturbed, psychotic, self-destructive or who have fire-setting histories. The facility will not consider a young man who has a history of sex offenses. The Director of Admissions and the admissions staff are responsible for determining the appropriateness of a referred candidate.

Program Description

Glen Mills uses a therapeutic community in which norms (expected behavior) are maintained by utilizing peer pressure to confront negative behavior and by modeling pro-active behavior. Norms are modeled, monitored, enforced and supported by all staff members. The normative culture found at Glen Mills is a pro-social, positive, non-threatening environment where all members are safe from violence, and have the opportunity to enhance their growth and development physically, socially, educationally and vocationally.

Glen Mills does not use a traditional social work or psychotherapeutic modality. The program statement states that "counseling" is one of the services offered by the facility. The counselor may help their youth on a confidential basis to deal

with personal issues; however, the dominant emphasis is on "here and now" behavior and program participation.

The basic program areas and services of Glen Mills include academic education, vocational training, student placement department, recreation, intramural and interscholastic sports and the Battling Bulls Club.

The Battling Bulls Club is described as an integral part of the program. The boys gain entrance into the Club by demonstrating a certain level of positive attitude and performance. Privileges for the members of this Club include on and off grounds social activities and the opportunity to work in the Student Counselor Program. The Campus Executive Officers in the Bulls Club are elected by the student body and serve as the Student Council at Glen Mills.

There are four levels of membership in the Battling Bulls Club:

1. pledge status
2. unit member
3. unit executive member and
4. campus executive member

Each student is rated weekly as to his behavior. The following values are assigned, shared with each student and posted: positive, neutral, negative.

The following format is used when staff and the Battling Bulls Club members determine that there is a need for confrontation. There are seven levels of confrontation that serve as a guideline to maintain the Schools' positive normative environment. The levels guide the youth in the change process from negative behavior to pro-social behavior while maintaining dignity and lessening the number of incidents when physical restraint is necessary. The seven levels are:

1. Friendly Non-Verbal
2. Concerned Non-Verbal
3. Helpful Verbal
4. Concerned Verbal
5. Request for Staff and/or Student Support
6. Touch for Attention
7. Physical Restraint

Levels 1 through 5 may be used by any youth. The Glen Mills staff members are the only individuals that are allowed to utilize levels 6 and 7. Level 6 consists of a staff member touching a youth below the neck and above the waist for attention. If at this point the youth has not accepted the non-verbal or verbal confrontations, the staff member might firmly place his hand on the youth to show that he is extremely concerned about his present behavior.

The program statement described a level 7 confrontation as one that may be used after all other levels of confrontation have failed, it is the responsibility for the staff involved to hold the youth until he appears to settle down. If the youth at any of the levels of confrontation attempts to walk away, turn away, etc. the staff's responsibility is to hold him and keep him under control. The confronting staff will use the least amount of physical restraint as possible until the youth is no longer out of control or a threat to himself, others or property. At this time, staff will take this opportunity to talk to the youth and use the incident to help him mature and grow.

The FIVE BASIC BEHAVIORAL NORMS are the foundation of the Glen Mills Schools, and on which all other norms have been developed. They are:

1. No one has the right to hurt another person.
2. Education and the classroom are sacred.
3. We will never behave in any way that will discredit ourselves, our unit or our schools.
4. We take pride in our school.
5. A Glen Mills student is always a gentleman.

OUT-OF-STATE CERTIFICATION REVIEW FINDINGS

The Out-of-State Certification Team (OSCT) conducted a certification review May 10-21, 1999. The team reviewed a sample of ten (10) files of current youth at the facility who have been placed by California probation departments. We reviewed ten (10) client files of California youth who have been discharged from Glen Mills. The team reviewed thirty (30) staff files from a variety of disciplines. The team interviewed 24 staff members and eleven youth. The staff interviews included the Admissions Coordinator for California, the Admissions Director, medical staff that included staff from both the Dental Clinic and the Medical Center, educational and vocational staff, direct care staff that included counselor/teachers, senior counselors and team leaders. A rotating night shift staff member was also interviewed as well as a Special Education Teacher.

A physical plant inspection was conducted. The OSCT observed a variety of activities while at Glen Mills Schools. We observed meals in the cafeteria, students spending class time in the Academic Building, the Learning Center, GED and Pre-GED classes, the vocational training classes and the computer lab. The members of OSCT observed student time in the Glen Mills library, study time in a living unit, athletic activities such as rink hockey, volleyball, and baseball. We also observed some free time in the Student Union and students while they were working in the student snack shop. We attended the grand opening of the newly remodeled residential unit, Lincoln Hall. We did not observe a Guided Group Interaction because the administrative staff emphasized that these group meetings are deeply personal to the youth. We attended Career Day that took place in various areas of the campus. There were approximately 100 guests that represented numerous employers and trade schools.

Program Overview

Youth stay for varying lengths of time at Glen Mills. The facility would like to have the youth in the program for a minimum of fourteen months in order for the youth to receive the maximum benefit that is possible. The primary approach to both education and vocational training is the Normative Culture. Several staff members informed us that "norms come first and then education." They explained further that youth are not able to learn in an environment that is loud, disruptive, chaotic and that does not feel safe to the youth and staff alike.

Manual restraints are rarely used. Most of the youth interviewed reported that they have never seen a Level 6 or Level 7 confrontation. Most of the staff members that have been employed at Glen Mills for ten or more years said that they had been involved in only one or two restraints during that time. There is minimal staff turnover based on the information that most of the staff members have worked at Glen Mills for many years. The OSCT made a request to interview "a new staff member" and the newest staff available that day had been employed at Glen Mills for over three years.

Reports from the youth regarding school experiences were generally very positive. Many youth reported that they receive a high level of assistance when experiencing difficulty with class work. Each youth is administered the Metropolitan Achievement Test (MAT) to determine his present grade level. He is placed in the educational program that is designed for his academic level. The academic settings are as follows:

Learning Center
Intermediate Education
Pre-G.E.D. and G.E.D
College Prep
College Program
Computer Program

All staff reported that there is a strong emphasis on a multidisciplinary team approach to education and vocational training. Each student's program is individualized to provide instruction in specific areas needed to improve the student's behavioral and educational levels.

Glen Mills Schools has a large variety of vocational training. Youth are given the opportunity to gain experience in the following areas: engine repair, auto shop, print shop, plumbing, paint shop, electric shop, drafting, carpentry, journalism, optical lab, radio station, auto body repair, masonry, barber shop and welding. The vocation shops have excellent equipment in good repair. The facility also has a ceramics and pottery area in which youth can design pottery and utilize a pottery wheel and two separate kilns. The staff seemed to be very knowledgeable and enthusiastic about their respective fields of teaching.

Glen Mills has its own non-commercial FM radio station as part of the vocational training program. An 18-hole golf course is being built and the OSCT observed the current construction of this golf course. Golf is already offered as a competitive sport at the facility, and this golf course will afford the opportunity for Glen Mills to host golf tournaments on campus. The facility also sees it as a vocational training area as well. Glen Mills has a full-service Optical Lab in which students have the opportunity to learn all aspects of the optical business. The facility has a Student Placement Department that is equipped to provide the youth with skills that will help them find employment upon discharge as well as provide assistance in continuing their vocational training by helping them to gain entry to a trade school. This department also helps the youth gain entrance into the military.

The School also provides Life Skills Training courses. This provides the students with training and education in areas such as banking, labor unions, employment benefits, income taxes, budgeting money, saving money for large purchases, credit card issues, loans, purchasing and maintaining a car. There is also instruction in the areas of finding a place to live, managing time, living as a family unit and information on the various costs of living on one's own.

The School offers 16 varsity sports and all of these sports have a junior varsity level as well. All youth are encouraged to get involved in an organized sport but it is not required. The staff reported that some youth are better suited for an intramural sporting activity offered at Glen Mills such as water basketball, wiffleball, horseshoes, team handball, water volleyball, or Ultimate Frisbee.

The facility has its own Medical Center, Dental Clinic and Optical Lab. The medical evaluation, treatment and follow-up appeared to be very good as evidenced by the staff and student interviews as well as the site inspections of these facilities. The Dental Clinic is somewhat cramped and the population of the campus has clearly outgrown the current site. However, a new site is currently under construction. The youth that were interviewed consistently reported that no medical or dental problem had ever been ignored or left untreated. Most of them reported that they had hearing and vision screening as well.

There is no formal psychological counseling available but the youth can see a psychologist on an as needed basis. However, the administrative staff admitted that the school is not equipped to provide mental health services to a boy on a long-term basis. The facility requests that the youth be discharged if he is found to need long-term psychological services. Glen Mills Schools provides short-term counseling by a psychologist if the youth is in need of loss or grief counseling. The staff believe they are able to screen out nearly all youth who will require long-term mental health services. This was consistent with the interviews of the intake staff. The psychologists have trained the Glen Mills intake staff to recognize the "red flags" that would indicate a risk of suicide, psychiatric illness,

inability to bond in the social interactive setting, severe anti-social proclivities or any risk of fire-setting. Staff have a consistent record of selecting youth that best match their program.

All youth were casually dressed and neatly groomed. The boys do not wear uniforms, but wore stylish clothing in good repair. Many youth were wearing nearly new sneakers. They had neat, tidy haircuts, but they are clearly not the same haircuts for all boys. Many youth receive haircuts at the Glen Mills barbershop which is located on campus.

The staff members that are working during the hours of 12:00 am to 8:00 am have varying duties. The living units that are located at the outer perimeters of the campus are staffed by night shift staff members that are physically present at all times within that unit. There are several living units that are very close together in which the only night shift staff members are the ones who walk from unit to unit throughout the night hours. Some of the night shift staff are stationed outside various units and others are assigned to drive around the campus in a facility van. The staff that move from unit to unit are required to keep moving throughout the night, punch a time clock every 15 minutes and to call and check in with the switchboard every 15 to 20 minutes. The switchboard operator keeps a written log of these calls.

A night shift assistant supervisor was interviewed and reported that there may be a total of 10 minutes per hour when a night shift worker is not physically on the unit due to the roaming schedules of the night staff. This staffing issue was discussed in the exit interview with the administrative staff. Mr. Ferrinola, the Executive Director, reported that this scheduling is not negotiable and he is not willing to change this practice. He reported that he changed the facility policy for the night shift in order to keep the youth safe. He indicated that it is too easy for the night shift staff to fall asleep if they are in the same area all night. The members of the out-of-state certification team concluded that the facility is providing adequate care and supervision during the night shift.

Each youth has free access to telephones that are located in the student union at any time during the day or evening while school classes are not in progress. The boys are allowed to make collect calls and calls billed to their own calling cards in the student union from 12-1 p.m., 3-5 p.m. and 6-8 p.m. daily. There are some telephone calls that the youth place from the unit and the costs for these calls are paid by Glen Mills.

Issues Involving Personal Rights

California licensing standards require that clients send and receive unopened correspondence unless prohibited by court order or by the child's authorized representative(s).

1. Some youth reported that they open their mail in front of staff members who "scan" the letters for gang graffiti and contraband.

Issues Involving Emergency Intervention Staff Training

California licensing standards require that the emergency intervention training curriculum address the physical techniques of applying the manual restraints in a safe and effective manner ranging from the least to most restrictive type(s) of restraints including, but not limited to, escorting, wall restraint, and prone containment. The training must include a written and hands-on competency test as part of the training program. The training must be provided by an individual who holds a valid instructor certificate from a program of managing assaultive behavior, that is consistent with the regulations. When an inappropriate manual restraint is used during an emergency intervention, the licensee must develop a corrective action plan, and as part of the plan may require facility personnel to repeat the appropriate emergency intervention training. Manual restraints must never be used as a substitute for, or as part of a behavior modification program or to prevent a child from leaving the facility when such departure does not represent imminent danger to the child.

2. All of the staff interviewed reported that no standardized system of physical management is used or taught at Glen Mills. Most of the staff in the interviews indicated that Glen Mills uses the Seven Levels of Confrontation as the restraint procedure at the School. The staff members indicated that only level 7 is considered to be a physical management technique. Level 6 also involved the staff putting their hands on a child although this technique as demonstrated does not appear to be a restraint. Both level 6 and 7 interventions appear to be used infrequently as evidenced in interviews of youth and staff, but there is still a need for a more standardized system of physical management and a means of training in these specific techniques.

Most of the staff and the youth described the level 6 intervention as an attempt by the staff to get the child's attention and this involves holding his upper arms while giving him verbal direction. Two boys reported that the front of the shirt was grabbed when a level 6 confrontation was done. The youth demonstrated this in the interviews. One boy reported that a level six confrontation consisted of a staff member poking his chest.

3. The OSCT read a staff entry in a behavioral log that stated a child who went AWOL was "tackled" by staff.

4. The Glen Mills program statement indicates that it is the responsibility for the staff member to hold the youth if a child attempts to walk away or turn around during any of the seven levels of confrontation. Walking away or turning around does not constitute a danger to self or others.

NOTE: The OSCT received Glen Mills Schools' Emergency Intervention Plan (EIP) on June 23, 1999; the EIP is currently under review. This EIP includes a training curriculum for staff as well as a plan for documenting restraint incidents and appropriately dealing with AWOLs (runaways).

Issues Involving Children's Records

California licensing standards require that a copy of the child's original needs and services plan is retained in the child's file; verification, signed by the child and his/her authorized representative(s) that they were offered the opportunity to participate in the plan development; and verification that the authorized representative(s) have approved the plan.

5. The needs and services plans are not signed by the authorized representative.
6. Many of the needs and services plans were not individualized for each child. The plans were generic in some cases.

California licensing standards require that the child's file contain consent forms, completed by the child's authorized representative(s), to permit the facility to authorize medical care.

7. The members of OSCT found only one file that contained a consent form for medical treatment that had been signed by the child's authorized representative. The authorized representative is the probation officer for the California youth who have been placed at Glen Mills. Glen Mills' consent forms were signed by the parent(s) of the child only. The administrative staff reported that the local medical hospitals want to see the authorization signed by a parent. The administration voiced the intention to acquire a consent form signed by the probation officer, in addition to that of the parent(s).

California licensing standards require that written policies and procedures governing a child's removal and/or discharge from the facility be developed, maintained and implemented. Children and their authorized representative(s) shall receive copies of such policies and procedures and signed copies shall be maintained in each child's file.

8. We did not find signed copies of the facility's policies and procedures regarding a child's removal and/or discharge in children's files.

California licensing standards require that all clients, or their authorized representative(s), shall be personally advised of and given at admission a copy of their personal rights.

9. The OSCT did not find a copy of the personal rights in the children's files. There is a form signed by each child stating the child was informed of his personal rights. However, the form does not include a list of the specific personal rights.

Issues Involving Reporting Requirements

Senate Bill 933 requires that Out-of State group homes in which California youth reside and receive Title IV-E funds must submit Serious Incident Reports to the Out-of-State Placement Policy Unit on all youth whether they are California youth or not. The types of incidents requiring reporting include any injury requiring medical treatment, runaway situations and each time a child is placed in a manual restraint.

10. The staff in the administrative interview emphasized that there are numerous cases of injuries in sporting events due to the high number of intramural sports and interscholastic sports. The administration reported that most of these injuries are sports related, not of a serious nature and are generally treated in the Glen Mills Medical Center. They questioned whether these injuries treated on campus needed to be reported. However, the facility has not reported some injuries that required treatment at a local hospital as indicated below.

The members of the OSCT found several instances in which Glen Mills Schools did not comply with this requirement. These cases all occurred after the reporting requirement began in January 1999. They are as follows: One child was taken to the Clozer Hospital emergency room on 1/29/99 due to injury while playing basketball. He sustained a non-displaced fracture of the right distal radius. Another child was also taken to the emergency room on 2/2/99 after falling on his right thumb in an athletic activity (wrestling). He sustained a displaced fracture of the right thumb. A child was elbowed in a basketball game on 3/29/99. This injury required a CT scan to be completed off of the Glen Mills campus. No nasal fracture was found.

Issues Involving Personnel Requirements

California licensing standards require staff responsible for providing direct care and supervision shall receive training in First Aid from persons qualified by agencies including but not limited to the American Red Cross. Additionally, California licensing standards require all personnel, including the licensee, administrator, staff and volunteers, shall be in good health, and shall be physically, mentally and occupationally capable of performing assigned tasks.

Good physical health shall be verified by a health screening, including a test for tuberculosis performed by or under the supervision of a physician not more than 1 year prior to or 7 days after employment or licensure.

11. Some staff files did not contain verification of up-dated first aid training.
12. Some staff had no health screening in their staff file.

Issues Involving Personnel Duties

California licensing standards require that staff shall perform the following duties: make notation of the child's progress, identify the possible need for professional services and communicate such findings to professional staff.

13. There were no daily progress notes in the children's files.

OTHER ISSUES/CONCERNS

Issues Involving Mandated Reporting Requirements

14. The staff that are employed in a childcare facility are all mandated reporters of alleged or suspected child abuse or neglect according to Pennsylvania law. Nearly all of the staff interviewed indicated that they did not know this term, "mandated reporter" and they did not know what the law stated. The staff indicated that they would report through a chain of command and would not file a report themselves nor ensure that a report was followed through to the Pennsylvania ChildLine.

NOTE: The OSCT received Glen Mills Schools' Emergency Intervention Plan (EIP) on June 23, 1999. This EIP includes training on mandated reporting.

CERTIFICATION DECISION

Glen Mills will be given an opportunity to submit a plan of correction in response to this report. Upon review of the plan of correction, a final certification decision will be made.