**PREA AUDIT: AUDITOR’S SUMMARY REPORT**

**JUVENILE FACILITIES**

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| **FACILITY INFORMATION** | |
| **Name of Facility:** | **Allen Hall** |
| **Facility Type:** | **DYS Facility and Program, and two Private Non-Profit Residential Programs (Contract Vendor for MA DYS)** |
| **Date of On-Site Audit:** | **August 11, 2014** |
| **PARENT AGENCY OR GOVERNING AUTHORITY INFORMATION** | |
| **Governing Authority or Parent Agency:** | **Massachusetts Division of Youth Services is the Governing Authority** |
| **Address:** | **Boston, MA** |
| **Agency Chief Executive Officer:** | **Peter Forbes – Commissioner** |
| **Agency Wide PREA Coordinator:** | **Monica King – State Wide PREA Coordinator** |
| **Email:** | [**monica.l.king@state.ma.us**](mailto:monica.l.king@state.ma.us) |
| **AUDITOR INFORMATION** | |
| **Certified Auditor:** | **Kurt Pfisterer – Dual Certified Adult and Juvenile Facilities** |
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**DESCRIPTION OF FACILITY CHARACTERISTICS:** The Allen Hall consists of three distinct programs; Worcester Secure, Butler and the Robert F. Kennedy Treatment Programs. There is a Facility Administrator that oversees all three programs. Each individual program has a Program Director. For the purposes of the audit, each of the distinct programs were viewed as separate housing units with a single facility.

The facility consists of a single four-story, brick and mortar structures with a fenced-in, secure perimeter. Originally built as a mental health facility, the housing units have been refurbished as secure juvenile housing. All youth rooms are single-occupancy bedrooms. Bathrooms and showers are designed for multiple uses, but are appropriately partitioned for privacy and safety. When more than one youth is in the bathroom staff is present.

Worcester Secure is a 15-bed hardware secure, long term treatment program for adolescent males ages 13-21, committed to the Department of Youth Services and adjudicated on Grid 3 or higher offenses. The program provides year-round educational services consistent with the Massachusetts Department of Elementary and Secondary Education standards. Clinical services, provided by licensed or licensed eligible clinicians, consist of weekly individual sessions, family sessions, crisis management/intervention and therapeutic groups (Dialectical Behavior Therapy, substance abuse treatment, substance abuse prevention and offense specific group). Each youth has an assigned clinician, staff advocate and education advocate. The advocate system is an essential part of treatment, insuring collaboration between program components. The program has an average length of stay of one year. There were nine youth present on the day of the audit.

The Butler Center is a 12-bed hardware secure treatment program that offers state-of-the-art clinical, educational and residential services to adolescent males ages 13-21. Youth with significant emotional and mental health needs are able to develop and practice strategies that will enable them to modulate their behavior and manage their mental illness. Treatment is delivered by a multidisciplinary team comprised of licensed clinicians, special education certified educators and specially trained Youth Counselors with an ultimate goal of returning youth safely to the community with minimal risk. The average length of stay is one year. There were nine youth present on the day of the audit.

The Kennedy School is a 10-bed secure treatment program for adolescent males committed to the Department for Youth Services delinquent and Youthful Offender offenses. Services provided include, but are not limited to, clinical, educational, family work, medical, recreational, positive youth development and spiritual services. The Kennedy School’s operational philosophy is to ensure that the program will carry out the mission of the Department of Youth Services to protect the public, prevent future crime and promote positive opportunities and change for juveniles in its care. The average length of stay is one year. There were nine youth present on the day of the audit.

Each of the programs maintains 24 hour supervisory coverage as well as an On-Call Administrator.

**SUMMARY OF AUDIT FINDINGS:** Auditor arrived at the facility the morning of August 11, 2014. An entrance meeting was held with the Facility Administrator (who also serves as the PREA Compliance Manager), Program Directors, Clinical Director, the DYS Regional Director and the DYS PREA Coordinator.

A complete tour of the facility took one hour. All areas were extremely well maintained. The facility has an outstanding video surveillance system. The system provides over 95 % coverage of all program areas. Every door in the facility is covered by a camera view. There are no cameras in bathrooms or youth bedrooms. Robust staffing (3 : 1 waking and 5 : 1 sleeping), significantly above the standards, and excellent supervision practices fully mitigate any concerns regarding multi-user showers and bathrooms. This was confirmed by all staff and youth interviewed, and observation of practice. Sight lines were good in all housing areas. The designated posts for the overnight staff are located to facilitate sight and sound supervision.

Youth were observed during morning hygiene, during recreation activities, on the housing units, during movement, and at meals. Observations of staff supervision practices were consistent with the agencies policies. Interactions observed between staff and youth were very positive and appropriately professional.

The PREA education program for youth and screening for risk are conducted by clinical staff on the date of admission, and documented in a data base known as the DYS Juvenile Justice Enterprise Management System (JJEMS).

Youth are seen by a licensed medical professional within 12 hours of admission. The medical services available to youth are excellent. Youth receive a full range of dental, medical and ophthalmological services.

Administrative investigations regarding allegations of abuse are conducted by the Massachusetts Division of Youth Services (DYS). Criminal investigations of sexual abuse, assault and harassment are conducted by the Massachusetts State Police. Forensic examinations and evidence collection are performed at local healthcare facilities through a state-wide Memorandum of Understanding with the Massachusetts Department of Public Health.

There were no incidents of sexual abuse, assault or harassment during this audit period. This was verified by telephone interview with the DYS Director of Investigations, who confirmed that there have been no incidents of sexual abuse or assault at the facility during this audit period.

Cross-gender strip searches and pat searches are prohibited by policy. All staff and youth interviewed confirmed that cross-gender searches are not conducted. Strip searches are not conducted on youth less than 12 years of age.

Room confinement, segregation and isolation are not used at any of the programs. This was confirmed via interviews with youth at all programs.

This auditor interviewed the following staff titles (number in parentheses indicates more than one staff in that title was interviewed):

* Facility Administrator
* Program Directors (3)
* Clinical Director
* DYS PREA Coordinator
* Nurse Practitioner
* Direct Care Workers (6)
* Program Supervisors (2)
* Facility PREA Compliance Manager

Experience levels ranged from two years to over 24 years. All presented as very knowledgeable about their jobs and highly dedicated to keeping youth safe. The agency’s commitment to PREA was also very evident during interviews. Staff members were not only aware of their agency’s policies and procedures, but were able to discuss PREA and how it related to the overall mission of the program and the agency’s mission as a whole.

All staff members were well versed in their obligations as mandated reporters. All felt well supported by the agency, and particularly the Facility Administrator, and had no fear regarding retaliation for reporting abuse. All staff interviewed had high praise for the Facility Administrator and most had difficulty answering a hypothetical question about how they would report abuse if they didn’t trust anyone at the program to report it to (they trust the Facility Administrator without reservation). All staff has received PREA specific training as first responders and all knew exactly what to do if they were a first responder. All felt empowered to proactively address issues related to sexual violence and were able to describe actions they would take to prevent and/or deter possible acts of sexual violence.

A total of 10 youth at the programs were interviewed. Three youth from Kennedy, three youth from Butler and four from Worcester Secure were interviewed. There were no youth currently at the facility that had made an allegation of abuse. There was one youth at the program who identified as bi-sexual (all youth acknowledged being asked about sexual orientation upon admission). All youth interviewed had extensive knowledge of the right to be free from sexual abuse, assault or harassment. All youth acknowledged being screened upon admission (screening actually occurs on date of admission, which far exceeds the standard) and receiving information upon admission on their right to be free from abuse in any form. All youth knew multiple ways to report abuse and felt very confident that any complaint they made would be properly addressed. None of the youth reported ever having fear for their safety while at Alternative Options Center (or any program in the DYS continuum of care). All said they felt very safe at the facility because the staff is always there and always willing to help. All youth interviewed knew the Facility Administrator by name and cited him as the one employee they knew they could count on to protect them if there was no one else to trust.

Interviews with youth and staff confirmed that the PREA education program and training has been fully integrated into the program.

The quality and organization of the documentation provided to this auditor was outstanding. The organized manner in which the interviews were facilitated by the agency made the process go very smoothly and allowed for lengthy interviews with no wasted time in between.

The Allen Hall is an outstanding provider of juvenile justice services. The scope of this audit (PREA compliance) does not afford the opportunity to go into all the positive aspects of the programs observed.

**STANDARDS DETERMINATION TOTALS:**

**Exceeds Standard – 3 Standards or approximately 7% of total standards.**

**Meets Standard - 38 Standards or approximately 93% of total standards.**

**Does Not Meet Standard – Zero Standards or 0% of total standards**

**CORRECTIVE ACTION PLANS**

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| **Standard** | **Deficiency** | **Action(s) Needed** | **Documentation** |
| **N/A\*** | **N/A** | **N/A** | **N/A** |
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**\*Note-All standards were found to be in compliance. No corrective action is required.**

**AUDITOR CERTIFICATION:**

This auditor certifies that no conflict of interest exists with respect to his ability to conduct an audit of the Massachusetts Division of Youth Services or the contract vendor providers of Allen Hall.

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Kurt Pfisterer, Dual Certified PREA Auditor Date