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

**JUVENILE FACILITIES**

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| **FACILITY INFORMATION** |
| **Name of Facility:** | **Charles T. Grucci – Alternative Options Center** |
| **Facility Type:** | **Private Non-Profit Residential Facility (Contract Vendor for MA DYS)** |
| **Date of On-Site Audit:** | **August 5, 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** |
| **AUDITOR INFORMATION** |
| **Certified Auditor:** | **Kurt Pfisterer – Dual Certified Adult and Juvenile Facilities**  |
| **Address:** | **8 Lakeshore Drive** |
|  | **Rensselaer, NY 12144** |
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| **Telephone:** | **518 860 5764** |

**DESCRIPTION OF FACILITY CHARACTERISTICS:** The Charles T. Grucci Alternative Options Center is a 12 bed, Staff Secure, Massachusetts Department of Youth Services (DYS) detention program operated by the Gandara Center.  The program began serving the Western Massachusetts area in September of 2013. The program is short-term with an average length of stay of 18 days. Youth referred to the program, which is an alternative to secure detention, are low Detention Placement Instrument (DPI) scored detainees awaiting court appearances.

The program utilizes the philosophical approach of Positive Youth development, focusing the advanced advocacy and behavior management system on the development of the youth’s assets and competencies. The program employs a Learning Experience Behavior System to encourage healthy choices and appropriate repairs for negative behavior.

The program’s Clinical Team also works with youth in collaboration with Family and Community Specialist in an effort to prepare youth and families for the adjudication process.  Youth attend school, meet with their clinicians, participate in groups and community meetings, enjoy physical activities, and receive on-site health, dental and eye care.  The program allows for regular family visitation and facilitates legal, assessment, and 30 day Department of Children and Families (DCF) meetings.

There were 9 youth present on the date of the audit (one youth left for court shortly after this auditor’s arrival and was therefore unavailable to be formally interviewed). The facility consists of one single-story, brick and mortar structure. The facility was originally built as a hospital. The facility is staff secure. Doors are locked from the exterior side to prevent unauthorized access. There is no perimeter fence. There are single and multi-occupancy bedrooms. Bathrooms and showers are designed for single use. Only one youth is permitted in the bathroom at a time.

The program 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 5, 2014. An entrance meeting was held with the Program Director (who also serves as the PREA Compliance Manager), Clinical Director, and the DYS PREA Coordinator.

A complete tour of the facility took 30 minutes. All areas were well maintained. The facility has a video surveillance system. The system provides 90-95 % 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 (4 : 1), significantly above the standards, and excellent supervision practices fully mitigate any concerns regarding blind spots. Bathrooms are for individual use. 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, in school, during movement, and at meals. Observations of staff supervision practices were consistent with the agencies policies.

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). Auditor was given an orientation to JJEMS by the regional DYS IT support technician and then a walk-through of the practical applications of the system by the program’s Clinical Supervisor. The system is incredible. It is extremely user friendly and easy to navigate. Information in JJEMS is available to all programs (vendor providers and DYS operated programs). This system allows for a very high level of fidelity regarding treatment plans and service needs throughout the DYS continuum of care.

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.

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

* Program Director
* Clinical Supervisor
* DYS PREA Coordinator
* DYS IT Support Technician
* Registered Nurse
* Detention Counselor II’s (4)
* Per Diem Relief Staff (2)
* Shift Supervisor
* Mental Health Clinician
* Facility PREA Compliance Manager

Experience levels ranged from two weeks to over 18 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 Program Director, and had no fear regarding retaliation for reporting abuse. All staff have 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 8 youth at the program were interviewed. There were no youth currently at the facility that had made an allegation of abuse. There were no youth at the program who identified as LGBTI (although 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. One youth went so far as to say he felt safer in the program than out on the streets. “Here is better”, he said.

Interviews with youth and staff confirmed that the PREA education program 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 Alternative Options Center program is an outstanding juvenile justice facility. The scope of this audit (PREA compliance) does not afford the opportunity to go into all the positive aspects of the program.

**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, the program or its parent company.

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Kurt Pfisterer, Dual Certified PREA Auditor Date