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

**JUVENILE FACILITIES**

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| **FACILITY INFORMATION** |
| **Name of Facility:** | **Harvard House (Eliot Community Human Services)** |
| **Telephone number:** | **(508) 754-6166** |
| **Facility Type:** | **Private Non-Profit Residential Facility (Contract Vendor for MA DYS)** |
| **Date of On-Site Audit:** | **August 12, 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** |
| **Email:** | **kurtpfisterer@gmail.com** |
| **Telephone:** | **518 860 5764** |

**DESCRIPTION OF FACILITY CHARACTERISTICS:** The Harvard House program is located in a residential neighborhood in Worcester, MA. Harvard House is a three-story, wood frame, 20-bed residential treatment program that contains two treatment tracks in one setting. The program promotes Positive Youth Development through personal responsibility, good citizenship, acceptance of self and others. Harvard House provides an environment where students can build character, confidence, competence, care and connection within the milieu. The goal is successful reconnection with families and community.

Treatment (Track 1) students participate in school, groups, family and individual therapy within the program and recreational activities in the program as well as in the surrounding community. Vocational based activities have been introduced to allow students to take marketable skills with them as they re-enter the community.

Community Supports (Track 2) students are offered the opportunity to sharpen independent living skills by attending school in the community as well as obtaining employment. They learn banking skills, how to utilize public transportation, obtain necessary identification forms and other basic living skills.

The program serves male youth ranging in ages from 13 to 21 years.

The facility has a capacity of 20. There were 11 youth present on the date of the audit (only nine were interviewed as one went to court and another was attending school in the community). The facility consists of one three-story, wood and plaster structure. The facility is staff secure. Doors are locked from the exterior side to prevent unauthorized access. There is no perimeter fence. Youth sleeping rooms are located on the second floor. There are single and multi-occupancy bedrooms. Bathrooms on the second floor are designed for single use. Showers are multi-stall, but only one youth is permitted in the shower area at a time.

The program is short-term with an average length of stay of 90-120 days.

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 or assault during the year prior to this audit. There were no instances of behavior that would fall under the PREA Standards’ definition of sexual harassment.

**SUMMARY OF AUDIT FINDINGS:** Auditor arrived at the facility the morning of August 12, 2014. An entrance meeting was held with the Program Director (who also serves as the PREA Compliance Manager), Clinical Supervisor and the DYS PREA Coordinator.

A complete tour of the facility took 30 minutes. All areas were well maintained. The facility has no video surveillance system. Robust staffing (3 : 1), significantly above the standards, and excellent supervision practices fully mitigate any concerns regarding the lack of a surveillance system. 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 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.

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
* Assistant Program Director
* Group Care Worker
* Transitional Coordinator
* Per Diem Relief Staff
* Shift Supervisor
* Mental Health Clinician
* Facility PREA Compliance Manager

Experience levels ranged from two years to over 19 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 9 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 Our House (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.

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 Harvard House 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 or the Harvard House program.

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Kurt Pfisterer, Dual Certified PREA Auditor Date