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

**JUVENILE FACILITIES**

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| **FACILITY INFORMATION** | |
| **Name of Facility:** | **Old Colony YMCA Central Branch (Detention, Assessment and Revocation Programs)** |
| **Facility Type:** | **Private Non-Profit Residential Facility (Contract Vendor for MA DYS)** |
| **Date of On-Site Audit:** | **August 18, 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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|  | **Rensselaer, NY 12144** |
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| **Telephone:** | **518 860 5764** |

**DESCRIPTION OF FACILITY CHARACTERISTICS:** The Old Colony YMCA Central Branch consists of three distinct programs; Boys Assessment and Stabilization Unit, Boys Detention Unit and the Boys Revocation Unit. There is a Facility Administrator that oversees all three programs. Each individual program has a Program Director. The facility has a PREA Coordinator and each of the programs has a PREA Compliance Manager. For the purposes of the audit, each of the distinct programs was viewed as separate housing units with a single facility.

The facility consists of the third, fourth and fifth floors of The Old Colony YMCA Central Branch. There are single-occupancy and multiple-occupancy bedrooms. Bathrooms and showers are designed for multiple users, but are appropriately partitioned for privacy and safety. When more than one youth is in the bathroom staff is present.

The Boys Assessment and Stabilization Unit is a 15-bed, staff secure program for adolescent males, ages 14-20 who have been committed to the custody of DYS. The goal of the program is to ensure public safety by housing youth in a staff-secure environment and to provide DYS with a comprehensive assessment of the youth’s individual treatment and care needs. The program also provides DYS with critical data from other social service organizations, schools, police, home, and the judicial system. This assessment is critical to determining the appropriate residential or community placement for each youth in the custody of DYS. A structured cognitive behavior modification system is utilized to guide the youth during their time in the program. Expectations for behavior and performance are clearly explained to youth. Respect and fairness are encouraged and imparted using the principles of consistency, predictability, and repetition (OCY Trauma Informed Care staff training). All program staff are trained in Dialectical Behavior Therapy (DBT) and are coached and supervised by the program’s Clinical Director. DBT groups are co-facilitated by a program clinician and a direct care staff member. Youth learn and understand that DBT is used in all areas of the program and can be translated into various real-life situations. Program staff work with youth in the milieu to practice these newly developing skills, role model effective communication, and to complete repairs (apologies) as incidents occur. The DBT repair is part of the restorative justice component of the program, as youth strive to repair the harm caused by their offense. Program staff implement the notion of giving back and reparation on a larger scale, working with and encouraging our youth to act in a way that will benefit others and take responsibility for the actions that resulted in their commitment. Youth receive a full spectrum of medical services. There were eleven youth present on the day of the audit.

The Boys Detention Program is a 15-bed, staff secure residency for adolescent males, ages 11 - 18.  While at the Program the youth are positively engaged in a variety of educational, clinical and pro-social activities and groups while awaiting their next court date. Youth are assigned a unit clinician and an advocate upon intake into the program.  Youth are able to meet with staff on a daily basis to assist them with any needs they may have while staying at the program.  While in the program the youth attend a full educational program throughout the week.  Clinical services are also offered to the youth which focus on Dialectical Behavior Therapy (DBT) to promote positive coping mechanisms and Substance Abuse Prevention.  Family engagement is important and is encouraged; family visits are offered on a weekly basis and scheduled to accommodate the family’s needs. All Youth participate regularly in health and wellness programming, including continued access to the gymnasium, fitness classes, and aquatics activities. Youth receive a full spectrum of medical services. There were eleven youth present on the day of the audit.

The Brockton Revocation Program is a 12-bed staff secure program that provides long-term treatment to adolescent males committed to DYS through adjudication as delinquent or through a youthful offender indictment. Youth in the program receive medical, educational, recreational and nutritional services. Youth engage with their families through unit events and regularly scheduled visits. Youth are approved for group and ground passes in conjunction with their progress in treatment. Individual passes are gradually initiated during the transition phase which generally occurs during the first 90 days of their treatment. There were eight 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 18, 2014. An entrance meeting was held with the OCY Regional Vice President (who also serves as the PREA Coordinator for OCY), Facility Administrator, Program Directors, Clinical Director, the DYS Director of Residential Operations and the DYS PREA Coordinator.

A complete tour of the facility took a little over one hour. All areas were extremely well maintained. The facility has a video surveillance system. The system provides 85-90 % coverage of all program areas. Every door in the facility is covered by a camera view with the exception of the school areas. OCY has plans to install cameras in this area. 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):

* OCY Regional Vice President
* Facility Administrator
* Program Directors (3)
* Clinician
* DYS PREA Coordinator
* Registered Nurse
* Youth Care Advocates (3)
* Shift Supervisor (4)
* Assistant Supervisors(2)
* Facility PREA Compliance Manager

Experience levels ranged from less than one year 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 Revocation, three youth from Assessment and four from Detention 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 (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 a comprehensive PREA education program upon admission and 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 interviewed have ever report abuse while committed to DYS. None of the youth reported ever having fear for their safety while at the facility (or any program in the DYS continuum of care). All said they felt very safe at the facility.

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 Old Colony YMCA 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 Old Colony YMCA.

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Kurt Pfisterer, Dual Certified PREA Auditor Date