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

**JUVENILE FACILITIES**

**INTERIM** **FINAL**

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| **Dates of on-site audit:** | **April 27-28, 2015** | |
| **FACILITY INFORMATION** | | |
| **Name of Facility:** | **Goss Building** | |
| **AGENCY INFORMATION** | | |
| **Name of Agency:** | **Massachusetts Department of Youth Services** | |
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**NARRATIVE:** The Goss Youth Services Center is a secure 60 bed facility for male adolescents operated by the Massachusetts Department of Youth Services (DYS). The on-site portion of the PREA Audit took place April 27-28, 2015 and covered the audit period of April 27, 2014 to April 27, 2015. On the morning of April 27, 2015 this auditor entered the facility for purposes of conducting an on sight tour of the facility and interviewing youth, staff, volunteers and contractors. The facility provided a list of all staff by shift and employee job categories and a list of all youth by housing unit. Prior to arrival this auditor reviewed pertinent agency policies, procedures, and related documentation used to demonstrate compliance with the Juvenile Facility PREA Standards. The pre-audit review of documents contained in the Pre-Audit Questionnaire submitted by the facility prompted few questions. Answers to those questions were submitted to this auditor by the facility staff and any additional remaining questions were resolved during the audit. This auditor interviewed ten of the current 44 youth. The youth interviewed were a representative sample from each of the four housing units. Length of stay for those interviewed ranged from two weeks to 11 months. There were no youth who identified themselves as lesbian, bisexual, gay, transgender or intersex and no youth who needed translation services. No youth had specifically requested to speak with this auditor nor had this auditor received any written correspondence from youth or staff. There were no youth currently in the program who made an allegation of sexual abuse or sexual harassment.

During the tour, additional questions were answered by executive and upper-level management staff. Staff and youth interviews followed and were conducted privately in a room with video surveillance. There are no SANE or SAFE staff employed at the facility. These services are available at the local hospital through a state-wide Memorandum of Understanding (MOU). This auditor reviewed the MOU to provide SANE and SAFE services, and crisis counseling. This auditor interviewed members of the incident review team and the staff member charged with monitoring retaliation. Administrative investigations (sexual harassment only) are conducted by trained DYS staff and criminal investigations are conducted exclusively by the Massachusetts State Police. There were no volunteers or contractors interviewed as none were at the facility or available during the audit. The agency Executive Director had been previously interviewed by this auditor.

**DESCRIPTION OF FACILITY CHARACTERISTICS:** The Goss Building is a 60 bed secure juvenile facility operated by the Massachusetts Department of Youth Services (DYS). The facility consists of a single brick and mortar building within a secure, fenced perimeter. There are four distinct programs within the Goss Building; Goss 1 (secure treatment), Goss 2 (secure detention), Goss 3 (secure treatment), and Goss 4 (secure revocation).

Goss 1 Secure is a 15 bed hardware secure, long term treatment program for male youth aged 13-21, committed to the Department of Youth Services, and adjudicated on Grid 3 or higher offenses. Educational programming is provided during the school year, as well as summer school, consistent with Department of Elementary and Secondary Education and Massachusetts Common Core standards. Clinical programming, provided by highly trained, independently licensed or license eligible clinicians, consists of weekly individual sessions; family sessions (if applicable); crisis management and intervention; and therapeutic groups including: Dialectical Behavior Therapy (DBT): Advanced DBT; Substance Abuse Treatment; Substance Abuse Prevention; and Offense Specific Group. In addition to implementing our positive based behavior management system, direct care staff also provides structured recreational activities, and act as advocates to assigned youth. The advocate system is an essential part of treatment at Goss 1 Secure, insuring collaboration between program components, as each resident has an individual clinician, as well as a staff advocate and an educational advocate. In addition to treatment provided by the team within the program, Goss 1 Secure also makes an effort to involve families through our monthly family events. These events occur separate from regularly scheduled visitations times, which residents engage in planning and preparing, and include planned activities, meals, and themes consistent with holidays.

Goss 2 Detention Program serves detained/bail status youth from ages 13-18 and in rare instances up to age 21. The average length of stay is 21 days. Youth are ordered by the court for a variety of alleged crimes; murder, attempted murder, rape, assault and battery, property destruction and a host of misdemeanor crimes.

Expectations of the youth are to adhere to all policies and procedures that govern Goss 2 Detention and the Department. Youth in care are expected to attend school during the day time hours that consist of English Language Arts, Math, Science, Social Studies, and Physical Education. Youth are also expected to attend Life Skills and Structured Reading at least twice a week. The youth in care also attend groups facilitated by the Clinical Team that consists of highly trained independently licensed Clinicians. The groups offered are Substance Abuse and DBT (Dialectical Behavior Therapy). Direct care staff assist and co-facilitate. Religious services are also offered twice a week on a volunteer basis.

The program has instituted a “Positive Behavior Incentive System”. Youth earn COINS for exhibiting positive behaviors throughout the day including performing DBT skills that staff observe; the objective is to “catch a youth doing something good”. COINS earned can buy an abundance of privileges on the canteen list as well as variety of activities.

Goss 2 Detention is also responsible for the South East Area Communications Department (SEACOMM). SEACOMM is an after-hours on-call communications center which is responsible for receiving phone calls and documenting all calls. SEACOMM provides after hour transports that may be needed within the region including arranging pick-ups of arrested youth from area Police stations after hours. SEACOMM is in constant contact with local Police Departments region wide and the Area On-Call Team.

Goss 3 services committed DYS male clients from the age 13-21 that have been referred by the Department of Youth Services Regional Review Team (RRT). The RRT is a classification panel that reviews client case history, criminal history, medical history and treatment needs and defines the level of treatment needed. All clients serviced at Goss Secure Treatment have been classified by the RRT with a time assignment of 6 months or longer. Goss Secure Treatment services all clients referred by the RRT no matter their developmental limits and/or medical issues.

Each client has an individual treatment plan that defines individual clinical, medical, and educational needs. Clients address these needs through, individual clinical sessions, clinical groups, family therapy, educational classes, medical/medication evaluations, and observation of appropriate adult role modeling by staff. Specific client services include:

* Offender/Victimization Skills allow the client to identify offending behavior and the lifestyles and choices that lead to offending behavior in addition to taking responsibility for the behavior that leads to continued delinquency. The client understands victimization and the impact that their behavior has on other people.
* Violence Prevention Skills allow client to identify the impact of violence on daily living and how to cope with the violence in their lives. Client will also have skills in decision making particularly with regard to peer interactions.
* Dialectical Behavior Therapy skills allow client to focus on relaxation, emotion regulation (learning about emotions, coping with emotions and appropriate expression of emotions), distress tolerance (learning to cope with negative emotions and feeling bad), and interpersonal effectiveness (skills to maintain positive relationships and end unhealthy relationships).
* Educational Services will allow client to develop skills in math, science, English, reading, IEP accomplishment, HISET Programming (specified clients) and college courses (HISET Graduates).
* Medical Services will allow client to by evaluated for physical fitness (physicals), medication needs, wellness evaluations, and emergency care.

Goss 4 Revocation Unit has a current budgeted capacity of I0. The program serves a complex array of youth with a variety of legal and behavioral issues. These include:

* Youth who violated their Grants of Conditional Liberty (GCL) and are awaiting a revocation hearing;
* Youth who have open juvenile charges and are held on bail ;
* Youth who have open adult charges and were previously in jail , but were bailed out and came on a detainer for a revocation hearing;
* Youth who have been removed from their current treatment programs due to .behavioral issues;
* Youth who were at another program, were revocated and the RRT deemed a 90 to 120-day treatment period was needed;
* Youth who were committed near to their 18th birthdays, underwent assessment, and will age-out before they can complete a traditional treatment program (i.e., aging-out in less than 3 months);
* Youth who have serious open juvenile charges, with high bail status, who are committed to DYS on lesser charges and require an "Assessment of Needs.'' These youth come to Goss 4 to complete their assessments because their open charges require a hardware-secure setting;
* Youth who are revocated close to their 18th birthday and will ultimately age-out on the unit.

Youth who violate their GCL are brought to the unit and await a revocation hearing. Program staff reach out to the caseworker to determine what the violations were in the community and get an idea of what they are planning to ask for (1-7, 15-30, 90-120 or RRT) in the revocation. Clinical work in the first week (as the revocation can take from 1-7 days) is focused around the violation, sometimes family preservation and restoration, and preparing the youth for the revocation.

If the plan is for them to remain on the unit, clinical staff consults with the youth's caseworker regarding the issues in the community and what the youth needs to work on. Clinical work is typically focused around the violation, what didn't go so well for them, what worked for them, redesigning or enhancing parts of the relapse prevention plan, family preservation and restoration, and minimizing risk in the community.

When Youth are given a 90-120 day time assignment, they are automatically presented to the RRT. Sometimes these young people will attend programming at another DYS residential facility. Clinical work is focused on helping them manage their behavior and plan for RRT outcome.

If the plan is for the youth to stay at Goss 4 for the 90-120 days, or the youth was at another unit and the RRT decision was to place the youth at Goss 4 for 90-120 treatment purposes the initial staffing is scheduled immediately, and usually occurs within the first few days of a youth's arrival. A treatment plan is developed within the first two weeks. Clinical work is specifically targeted around treatment goals, family preservation and restoration, crisis intervention, relapse prevention, and managing and minimizing risk in the community.

Youth can be removed from other programs for negative behavior (short notice, very little time to plan). Clinical staff at Goss 4 confers with the caseworker about the youth's plan (RRT or timeout with intent to return the youth to the sending program). Clinical work typically involves problem solving and crisis intervention.

Youth with open, juvenile court charges typically stay at Goss 4 and are considered dual status. Dual status youth (with open juvenile charges) can be at Goss 4 for a month to well over a year (depending on the seriousness and complexity of the case). Clinical work involves discussion with the caseworker and family around what the youth needs to work on. Clinical designs a treatment plan with the input of family, youth and caseworker. Treatment is focused on problem solving and skill building; we look at the previous relapse prevention plan and see what adjustments can be made. True treatment at this point cannot occur, as the program cannot discuss the youths' open charges.

The Goss Building maintains 24 hour supervisory coverage as well as an On-Call Administrator.

**SUMMARY OF AUDIT FINDINGS:** Auditor arrived at the facility the morning of April 27, 2015. An entrance meeting was held with the DYS Regional Director, Facility Administrator (who also serves as the PREA Compliance Manager) and the DYS PREA Coordinator.

A complete tour of the facility took approximately two and a half hours. All areas were well maintained. The facility has a video surveillance system which provides coverage for 95% of the facility. The system provides coverage of the recreation areas, dining hall, all housing units, hallways and education areas. There are no cameras in the youths’ rooms. There is a camera view of all doors in areas where youth are permitted. Observed staffing (3 : 1), while this auditor was on site exceeds the standards requirement of 8: 1. All units have multi-stall showers and toilets which are appropriately partitioned for privacy and properly supervised when more than one youth is in the room. This was confirmed by all staff and youth interviewed, and observation of practice. Sight lines were excellent in all housing areas except on Goss 2. There are two alcove areas that were created when two large multiple occupancy rooms were divided to create smaller rooms for individual use. There are camera views of the entrances to both alcoves. Program staff are well aware of the vulnerability of these areas and supervision has been adjusted to mitigate the risk. The facility has plans and funding to install panoramic cameras in this area.

Youth were observed during school, during movement, and at meals. Observations of staff supervision practices were consistent with the agencies policies.

The PREA screening for risk is conducted by the clinical staff on the date of admission, and documented. All youth interviewed acknowledged being screened on the date of admission as well as being seen by medical staff within 24 hours of admission.

Administrative investigations regarding allegations of sexual harassment are conducted by trained DYS investigators. A review of investigators’ reports confirmed an aggressive response to all allegations of harassment. Criminal investigations of sexual abuse and assault are conducted by the Massachusetts State Police. Email contact with the DYS General Counsel confirm that there were no incidents of sexual abuse or assault during this audit period. A state-wide MOU is in place to provide forensic examinations and victims’ services. Forensic examinations and evidence collection would be performed at the Morton Hospital.

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

* Facility Administrator
* Clinician Director
* Program Director (2)
* Assistant Program Director (3)
* DYS PREA Coordinator
* Nurse (3)
* Group Worker I, II and III (9)
* Facility PREA Compliance Manager

Random direct-care staff were selected for interviews to include staff from all housing units. Experience levels ranged from two and a half to over 20 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 knew their obligations as mandated reporters and first responders. All felt well supported by facility management, and had no fear regarding retaliation for reporting abuse. All staff have received PREA specific training as first responders and all knew 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 potential and/or imminent threats of sexual violence.

A total of 10 youth at the facility were interviewed, and included youth from all housing units. Ages ranged from 15 to 20 years. There were no youth currently at the facility that had made an allegation of abuse. There were no youth currently at the facility who had reported an allegation of sexual harassment. There were no youth at the program who identified as LGBTI or had been identified as gender non-conforming in appearance. 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 were aware of multiple methods for reporting abuse. 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. No youth reported ever having fear for their safety while at the facility or at any time during commitment with DYS. All said they currently felt safe at the facility. Many said that they felt safer at the facility than on the streets.

The quality and organization of the documentation provided to this auditor was outstanding. The pre-audit questionnaire completed by the DYS State-Wide PREA Coordinator is one of the better ones I have ever received. The referenced documents in the questionnaire were provided electronically.

The organized manner in which the interviews were facilitated by the PREA Compliance Manager and the DYS State-Wide PREA Coordinator made the process go very smoothly and allowed for lengthy interviews with no wasted time in between.

The Goss Building is an excellent 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 – 2 (Two) Standards or approximately 4% of total standards.**

**Meets Standard - 40 (Forty) Standards or approximately 96% of total standards.**

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

**AUDITOR CERTIFICATION**

This auditor certifies that no conflict of interest exists with respect to his ability to conduct an audit of the Massachusetts Department of Youth Services or the Goss Building.

\_\_**Kurt Pfisterer/s/**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_ May 4, 2015

Kurt Pfisterer, Dual Certified PREA Auditor Date