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

**JUVENILE FACILITIES**

**INTERIM** **FINAL**

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| **Dates of on-site audit:** | **April 30, 2015** | |
| **PROGRAM INFORMATION** | | |
| **Name of Program:** | **LIFE Program (Communities for People)** | |
| **AGENCY INFORMATION** | | |
| **Name of Agency:** | **Massachusetts Department of Youth Services** | |
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**NARRATIVE:** The LIFE Program is a non-secure, community-based, 6 bed program for male adolescents operated jointly by the Massachusetts Department of Youth Services (DYS) and the Communities for People. The on-site portion of the PREA Audit took place April 30, 2015 and covered the audit period of April 30, 2014 to April 30, 2015. On the morning of April 30, 2015 this auditor entered the program for purposes of conducting an on sight tour of the program and interviewing youth, staff, volunteers and contractors. The program provided a list of all staff by shift and employee job categories and a list of all youth. Prior to arrival this auditor reviewed pertinent agency policies, procedures, and related documentation used to demonstrate compliance with the Juvenile Program PREA Standards. The pre-audit review of documents contained in the Pre-Audit Questionnaire submitted by the program prompted no questions. This auditor interviewed four of the current six youth. The youth interviewed represent two thirds of the population. Length of stay for those interviewed ranged from one to three 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 at the program.

During the tour, additional questions were answered by executive and upper-level management staff. Staff and youth interviews followed and were conducted privately. There are no SANE or SAFE staff employed at the program. These services are available at the Boston Children’s Hospital through a state-wide Memorandum of Understanding (MOU). This auditor reviewed the MOU to provide SANE and SAFE services, and crisis counseling. 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 program or available during the audit. The agency Executive Director had been previously interviewed by this auditor.

**DESCRIPTION OF PROGRAM CHARACTERISTICS:** The Learning Independence, Fostering Empowerment (LIFE) Program is a community based residential program that serves young men involved with Department of Youth Service (DYS). The program’s overall goal is to provide youth involved with treatments and supports which enable self-sufficiency and promote independence as they transition back into the community.

LIFE provides services to older adolescent males between the ages of 16 to 21 who are involved with DYS and have met all appropriate criteria which allow them to begin their transition back into the community. The program has been designed to incorporate DYS Community Supervision team and is directly connected to local district offices and supervision network

All referrals to the program are reviewed by the Programs intake team, consisting of Program Supervisor and Clinical Director. The intake team coordinates with DYS clinical team and other client collaterals to discuss treatment goals and transition plan prior to all intakes.

The services of the program are provided through an Independent Living treatment approach which is based on life skill education/development in the community. The program consists of one Transition site and individual apartment units in the community. The Transition site functions as a fully staffed residential program and serves as the Pre-Independent Living portion of the program. Individual apartment units are reserved for youth 18+ who have met all appropriate criteria and have been assessed by their treatment team as being prepared to live independently in the community.

The site is located at 64 Brooks Street in Brighton. The site has the capacity for up to 6 youth and is staffed based on a pre-independent living staffing ratio (1-6). Individual apartment units are obtained and secured based on the needs of the youth and are located in the Greater Boston area. As a community based program, LIFE utilizes the surrounding community to provide a wide range of medical, dental, educational, mental health, and vocational services toward youth’s treatment.

The program’s treatment team provides a full range of case management services and clinical services including: advocacy, service planning/delivery, referral coordination, individual counseling, and group counseling and milieu crisis intervention services. Length of stay varies based on the individual needs of the youth. The treatment team works actively with youth, their family and involved collaterals to create a clear plan identifying goals which will ultimately lead to a youth’s reunification with family or to live independently in the community.

**SUMMARY OF AUDIT FINDINGS:** Auditor arrived at the program on April 30, 2015. An entrance meeting was held with the Program Supervisor, Agency Regional Director (who also serves as the PREA Compliance Manager), Clinical Director and the DYS PREA Coordinator.

A complete tour of the program took approximately 15 minutes (building is a three-story residential home). All areas were well maintained. The program does not have a video surveillance system. Observed staffing (3 staff: 1 youth), while this auditor was on site far exceeds the standards requirement of 8: 1. Both floors have single user bathrooms. Youth are permitted to shower and use the bathroom alone. This was confirmed by all staff and youth interviewed. Sight lines are good in all areas of the house.

One youth returned to the program from work in the community while this auditor was on-site. All youth in the program work and/or attend school in the community. A total of four youth were interviewed. An extensive review of the full electronic case records for the other two youth was conducted in lieu of interviews (auditor would have had to stay on sight until after 10:00 PM and attempt to interview exhausted youth who just spent a full day at school and work).

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. Telephone and email contact with the DYS General Counsel confirm that there were no incidents of sexual abuse or assault during this audit period. Forensic examinations and evidence collection are performed at the Boston Children’s Hospital. A state-wide MOU is in place to provide forensic examinations and victims’ services.

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

* Clinician Director
* Program Supervisor
* Agency Regional Director
* Direct-Care Worker
* Program PREA Compliance Manager

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 program 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 four (out of 6) youth at the program were interviewed. Ages ranged from 18 to 19 years. There were no youth currently at the program that had made an allegation of abuse that occurred at the program. There were no youth currently at the program who had reported an allegation of sexual harassment that occurred at the program. 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. All youth in the program have cell phones. No youth reported ever having fear for their safety while at the program or at any time during commitment with DYS. All said they currently felt safe at the program.

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 LIFE Program is an extremely unique juvenile justice program. 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 LIFE Program.

\_\_**Kurt Pfisterer/s/**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_ May 17, 2015

Kurt Pfisterer, Dual Certified PREA Auditor Date