

2022 Inspection Report

KNOX COUNTY

JOHN ALBRIGHT

Executive Summary

The Department of Juvenile Justice conducted an annual inspection of Mary Davis Home in Knox County on February 23, 2022, pursuant to 730 ILCS 5/3-15-2(b). The Department observed several areas on non-compliance during this review, many of which warrant immediate attention. The sections and specific requirements of the 20 Ill. Adm. Code 2602 County Juvenile Detention Standards (“County Detention Standards”) noted as non-compliant are listed in the table below, while specific observations are noted in the following sections of this report. Each section of the report also includes policy and practice recommendations to either gain compliance or move towards best practice. Those recommendations are combined in a second table at the end of the report.

Areas of Non-Compliance

Section	Requirement
2602.100 Clothing, Personal Hygiene, Grooming	Youth shall be permitted to shave as often as desired.
2602.110 Food Services	Meals shall be served and conducted in a group setting except when prohibited by security or medical needs. Three complete and balanced meals shall be served to each youth for each 24 hours of detention.
2602.170 Discipline	Youth shall not be deprived of the following basic rights as part of a disciplinary response: mattress, pillow, blanket, sheets; meals including evening snack; daily exercise; education. Room confinement may be used only as a temporary response to behavior that threatens the safety of the youth or others. Room confinement shall not be used for a fixed period of time, but only until the youth is calm enough to rejoin programming without being a risk to the safety of others. Supervisory staff shall be notified immediately when room confinement is used. At no time should room confinement exceed 4 hours without administrators and/or mental health staff developing an individualized plan to address the behavior.
2602.230 Education	Teacher student ratios are at least 1:12 for general education and 1:8 for students with Individualized Education Programs (IEPs). Qualified special education staff are assigned to youth with special education status and special education testing is available for youth in custody. There shall be a minimum of five hours of instruction per day.
2602.30 Personnel	A shift supervisor must be scheduled and available at all times and on duty during all waking hours and immediately available if not on duty during sleeping hours.
2602.50 Admissions Procedures	Youth shall be issued clean bedding . . . bedding shall consist of sheets . . . and a pillow. Following admission, a strip search may be administered only when there is an individualized, reasonable suspicion. Within 72 hours after the youth’s arrival at the facility and periodically throughout a youth’s confinement, the agency shall obtain and use information about

	each youth’s personal history and behavior to reduce the risk of sexual abuse by or upon a resident. Assessments shall be conducted using an objective screening instrument.
2602.80 Medical and Health Care	A medical doctor shall be available to attend the medical needs of youth. General medical physician services shall be provided in accordance with one or more of the following procedures: on salary, in accordance with locally established personnel pay plan; a contract with local physician or clinic for full-time coverage at specific hours and for emergencies, a contract with a local physician to conduct sick call, to be on call for emergencies and to examine newly admitted youth; arrangements with a nearby hospital to provide all needed medical services; and services rendered, without cost, by another agency or department or with costs prorated. Access to psychiatric and/or psychological services shall be provided in individual cases as needed. Nonmedical detention staff may issue any form of over-the-counter medication, providing the facility physician gives prior written approval to the facility for the issue.
2602.90 Mental Health Services	All facilities shall employ or contract with qualified mental health professionals to address the needs of youth identified in the mental health screening, as well as needs that arise during the period of confinement. Services shall meet or exceed the community level of care.

Methodology

- Interviews Conducted
 - Superintendent Steck
 - Director Pletz
 - Assistant Superintendent Bonis
 - Stacy Brown (Vice-President of Bridgeway)
 - 12 youth
 - 2 supervisors
 - 6 counselors

- Documents Reviewed
 - Youth Grievance Samples
 - Youth Grievance Procedure
 - CPR and First Aid Training Documentation
 - Fire/Emergency Logs
 - 2020 Fire Inspection Report
 - 2021 Health Department Inspection Documentation
 - Menu Samples
 - Nursing and Educational Staff Certificates
 - Officer Safety Training Curriculum
 - Youth Orientation Manual
 - Facility Program Schedule
 - Use of Force Continuum

- 15-minute Security Check Logs
- Employee Training Logs and Background Checks
- Samples of Resident Files
- Medical History and Physical Form
- Detention Level Program (DLP) Sheets
- Supervisor Schedule
- Policy and Procedure Manual (Draft)

Overview

Mary Davis Home is a 39-bed facility in Galesburg, Illinois. The primary programming space is a large common area that is centrally located between the four primary living units (referred to as Upper East, Lower East, Upper West, and Lower West). There is an additional living unit called the “Harvest Wing” in a corridor off the main programming area that has three additional rooms, one of which has a camera. The facility has a gym space just off the primary programming space with a large window separating the two areas. A single classroom is off the main area as well. The classroom is quite large and was decorated in a manner consistent with a community school. The facility has an extensive library with several books available for youth. Facility leadership has made the development of the facility library a priority over recent years.

The on-site portion of the review took place on Wednesday, February 23, 2022. At the time of the audit, the facility had 17 residents (10 males and seven females) and employed a total of 27 employees (including one cook who has been out on leave for two months and five third shift staff). Sixteen staff are designated as counselors and manage the day-to-day work with youth. The facility is budgeted for four supervisory positions, although only three are currently filled.

At the time of the review, there were not any youth on any type of COVID quarantine status. Facility administrators reported that while COVID-19 has certainly been a challenge over the past two years, the facility has been able to maintain some of regular practices with some intermittent interruptions. With limited exceptions during COVID-19 outbreaks, the facility has continued offering in-person visitation two nights a week. The visitation area is sizable and has some artwork, including a mural that was recently completed by a local community college. It is commendable that the facility has continued offering in-person visitation and has a welcoming space to host. The facility also has video conferencing capability and has utilized it for court and professional visits. Video conferencing has not yet been offered for family visitation, but administrators reported plans to use video conferencing for family visits in coming months.

Admission Policy and Procedures

Mary Davis Home offers 24-hour coverage for admissions. Youth property is collected, inventoried, and laundered according to standards. During the facility walkthrough, auditors observed the property room in which youth personal clothing was organized into bins by youth. Inventory receipts were present in the bins with clothing, as well as youth files.

The facility conducts strip searches of all youth upon intake. County Detention Standards permit strip searches of youth upon admission only when there is an individualized, reasonable suspicion of weapons, contraband, or body pests.

An orientation is conducted by a counselor during intake. The facility has a Youth Orientation Manual that includes a broad overview of programming and rules. Some youth indicated a lack of clear expectations after the initial orientation and learning more from their peers in the days following admission. There are opportunities to enhance the youth orientation process to make it less transactional and more robust.

Medical screenings are conducted by the facility nurse, who consults with parents over medical history and medications. The nurse also inspects medications that youth bring into the facility. They are not reviewed by a physician.

PREA requirements include an assessment to determine risk for victimization within 72 hours of each youth's admission and periodically throughout a youth's confinement. The facility has a draft form to use for such assessment, but the form has not yet been approved and implemented. These screenings are not yet taking place. The facility has not undergone an official PREA audit. It would be beneficial to hire a PREA Officer to ensure there is an internal mechanism for monitoring facility compliance with PREA standards.

Areas of Non-Compliance and Recommendations

- 2602.50 Admissions Procedures states: "Following admission, a strip search may be administered only when there is an individualized, reasonable suspicion."
 - Recommendation:
 - Eliminate the use of strip searches as a standard process during intake.
- 2602.50 Admissions Procedures states: "Within 72 hours after the youth's arrival at the facility and periodically throughout a youth's confinement, the agency shall obtain and use information about each youth's personal history and behavior to reduce the risk of sexual abuse by or upon a resident. Assessments shall be conducted using an objective screening instrument."
 - Recommendation:
 - Implement the PREA Risk for Victimization Assessment for youth within 72 hours of admission and periodically throughout a youth's confinement.
 - Hire a PREA Officer to supervise facility compliance with PREA standards.

Personnel, Staffing and Supervision

At the time of the facility walk-through, most youth at the facility were confined in their rooms. Several staff were gathered in the common area of the facility for training. Staff and administrators reported that training is conducted every Wednesday; during training, youth are largely confined in their rooms. There was one youth in a classroom working individually with the teacher, but the remaining youth were confined in their rooms.

Administrators reported difficulty in filling positions over the past year. The facility is budgeted for four shift supervisors. One supervisor recently resigned, leaving only three to cover seven days of waking hours. Youth and staff indicated there are shifts during waking hours in which a supervisor is not present at the facility. Administrators attempt to cover these, but both staff and youth reported there have been shifts in which no supervisor is present. In these cases, the most senior staff present plays the role of a supervisor. Staff, youth, and administrators indicated there are times when counselor shortages lead to youth confinement in their rooms. County Detention Standards require that a shift supervisor be scheduled and available at all times and on duty during all youth waking hours. It is clear that the facility will need more budgeted supervisory staff in order to meet this standard, as covering seven days of youth waking hours by only four employees is not sufficient, especially when taking vacations and sick time into account.

In the meantime, there are opportunities to implement more efficient scheduling to mitigate supervisor and staff shortages. On the day of the inspection, there were several supervisors and line staff present. Administrators and staff shared that all supervisors are scheduled on Wednesdays to conduct training for line staff and have a weekly meeting. In contrast, only one supervisor is scheduled for the entire day on Sundays from 9am-5pm. This scheduling prevents compliance with the standard that a supervisor be present for waking hours and as noted above, results in youth room confinement. Staff schedules should be structured in a way that maximizes coverage across the entire workweek. Given the challenges the facility is currently facing with consistent supervisor and line staff coverage, and the youth confinement sometimes associated with it, staffing resources should be scheduled to reduce the frequency of such occurrences.

Areas of Non-Compliance and Recommendations

- 2602.30 Personnel states: “A shift supervisor must be scheduled and available at all times and on duty during all waking hours and immediately available if not on duty during sleeping hours.”
 - Recommendations:
 - Budget for more supervisory staff to ensure adequate coverage is maintained.
 - Ensure a supervisor is present for all shifts during youth waking hours.
 - Alter supervisor schedules to maximize coverage throughout the week.
 - Alter counselor schedules to maximize coverage throughout the week.

Detention Programs, Youth Discipline, and Confinement

The facility utilizes a point grading system to track youth behavior. Youth are graded on an A through F scale at the end of each shift. Grades are averaged daily and shared with youth at the start of the following day. The averaged grade is associated with certain privileges, such as later bedtime, candy bars, and extra visits. Youth on the highest level are permitted to stay up until midnight one night per week to watch movies.

Counselors facilitate daily Life Skills Groups. The content of the groups is largely determined by the staff facilitating the group, although some of the groups are designated as Social Skills Groups and use the Boys Town Social Skills Training Curriculum. One counselor described facilitating groups on job

interviews and other types of skills. Counselors described working to engage and develop relationships with youth during general recreation time as well. During the walkthrough, auditors observed counselors interacting with residents by playing cards with them and sitting with them during mealtimes.

While there are some strengths in the life skills programming and staff interactions with youth observed, the utilization of confinement as a response to negative behavior at the facility is a significant concern and must be addressed urgently. The facility utilizes a consequence called “shifts” to address negative behavior. When a youth earns a “shift” the youth is primarily confined to their room for the entirety of a shift (i.e., eight hours). The Youth Orientation Manual describes behaviors that earn between one to four “shifts,” meaning youth are confined for eight to 32 hours for a single infraction. The Youth Orientation Manual also indicates the following:

“If you earn 1-2 shifts as a consequence you may be allowed to go to school; this will be based on your actions, how you reacted to being given the consequences, and whether there is a concern you will disrupt the class. You may be placed in a study carrel if it’s available.... If you’ve earned 3-4 shifts you will not go to school. If possible, you will be given materials in your room to review so you don’t fall behind and are prepared when you return to class.”

Both youth and staff interviews were consistent with the language in the Youth Orientation Manual regarding “shifts,” namely that they equate to youth confinement.

The facility also utilizes “Administrative Plans” for behavior that, per the Youth Orientation Manual, “goes beyond shifts.” Per the Youth Orientation Manual:

When on an Administrative Plan, you will have your movement restricted . . . This can be lifted once you earn a B for four weeks in a row. However, after two weeks of good behavior you can request the restriction be lifted early.

Both youth and staff reported youth are, at times, placed directly onto “shift” or “Administrative Plan” confinement upon intake based on behavior from a previous stay.

Some youth on an Administrative Plan are housed in the “Harvest Wing.” The “Harvest Wing” is located just off the main programming area through a door with a sign on it that reads “Segregation.” Youth who were interviewed referred to this area as “seg.” At the time of the inspection, two youth (a 15-year-old and a 12-year-old) were housed in the Harvest Wing. Both youths had a mattress, one blanket, and a book in their rooms. The youths did not have pillows and one stated the mattress was uncomfortable for his head because the mattress was torn and abrasive. The torn mattress was observed by the auditor. The youth reported he had been in segregation for about two months. Administrators estimated he had been there for approximately six weeks but could not confirm the exact amount of time. Administrators stated they try to get these youth out individually with staff each day for recreation, but at times it is inconsistent. Multiple youth also reported that recreation for youth in segregation was inconsistent. One of the youths in segregation stated he had been out for recreation the previous day for

approximately one hour but could not remember the time he was out prior. The other youth had trouble communicating when she was last out of her room and stated “I don’t know” when she was asked how long she is out of her room when she does receive recreation.

Multiple youth reported that youth in segregation frequently have their water turned off for extended periods of time. A supervisor acknowledged that water may be turned off for the overnight shift so they don’t have deal with youth flooding their rooms but will turn it on if a youth requests a drink of water or needs to flush a toilet. The auditor asked both youths if their water was on during their interviews. Both youths replied, “I don’t know” and tried the faucets at prompting from the auditor. The water to both rooms was on, but the youth were surprised that it was and one stated “they must have forgotten to turn it off.” The practice of turning water off as a preventative measure should cease immediately.

Youth, staff, and administrators reported that youth in segregation do not go to school, nor are they brought educational packets to work on independently. Administrators acknowledged that the youth who had been in segregation for six to eight weeks had not received any educational services during that time.

The practices Mary Davis Home employs regarding youth confinement are in significant violation of several County Detention Standards. These standards stipulate the following:

- Room confinement shall not be used for a fixed period of time, but only until a youth is calm enough to rejoining programming without being a risk to the safety of others.
- Supervisory staff shall be notified immediately when room confinement is used.
- At no time shall confinement exceed four hours without administrators and/or mental health staff developing an individualized plan to address the behavior.
- A full written report shall be made whenever room confinement is used.
- There shall be a minimum of five hours of educational instruction each day.

The facility utilizes a physical intervention technique called the SafeClinch Training System. The Use of Force Continuum highlights a process of staff presence, verbal de-escalation, and physical intervention using only the amount of force necessary to control a situation. The facility reported minimal use of mechanical restraints during physical interventions. The facility utilized pressure point control until July 2021, when the new County Detention standards were released. The Officer Safety Training curriculum provided states:

“At this point, this training is in addition to the other Officer Safety Training. None of the new techniques are considered “pain compliance” (which is what we currently use). Depending on requirements established by the Department of Corrections and AOIC, pain compliance may be forbidden or outlawed. Therefore, we are training techniques that are considered therapeutic holds.”

Training materials and policy should be drafted to explicitly state the use of pain compliance and pressure point control are prohibited.

Areas of Non-Compliance and Recommendations

- 2602.50 Admissions Procedures states: “Youth shall be issued clean bedding . . . bedding shall consist of sheets . . . and a pillow.”
- 2602.100 Clothing, Personal Hygiene, Grooming states: “. . . youth shall be permitted to shave as often as desired.”
 - Recommendations:
 - Provide all youth with sheets and pillows.
- 2602.170 Discipline states: “Youth shall not be deprived of the following basic rights as part of a disciplinary response: mattress, pillow, blanket, sheets; meals including evening snacks; daily exercise; education. Room confinement may be used only as a temporary response to behavior that threatens the safety of the youth and others. Room confinement shall not be used for a fixed period of time, but only until the youth is calm enough to rejoin programming without being a risk to the safety of others. Supervisory staff shall be notified immediately when room confinement is used. At no time should room confinement exceed 4 hours without administrators and/or mental health staff developing an individualized plan to address the behavior.”
 - Recommendations:
 - Eliminate the use of “shifts” as a behavioral consequence and replace them with a short-term timeout process that releases youth as soon as they demonstrate they are calm and able to return to programming.
 - Eliminate the current practices associated with Administrative Plans and the Harvest Wing.
 - Ensure youth have adequate bedding and materials in their rooms.
 - Implement policy that prohibits the use of confinement longer than 4 hours without administrator approval and development of an individualized plan.
 - Enhance the documentation of youth confinement time to include:
 - Written reports that indicate the reason for confinement.
 - The start and end times of the confinement.
 - Attempts to de-escalate the youth and return them to regular programming.
 - Immediately end any practice of turning off water as a preventative measure and implement a policy that prohibits this practice.
 - Revise training materials and policy to explicitly prohibit the use of pain compliance and pressure point control.
- 2602.230 Education states: “There shall be a minimum of five hours of instruction per day.”
 - Recommendation:
 - Deliver at least five hours of educational services to all youth each day, including those on special program statuses.

Medical and Health Care

There is one nurse that works at the facility five days per week for four hours each day. The facility has a sick call process by which a youth can request to be added to the sick call list, which is maintained in the control room to be given to the nurse upon her arrival. The facility does not have a medical physician on staff, nor is there an existing contract for a medical physician to provide services.

Areas of Non-Compliance and Recommendations

- 2602.80 Medical and Health Care states: “A medical doctor shall be available to attend the medical needs of youth. General medical physician services shall be provided in accordance with one or more of the following procedures: on salary, in accordance with locally established personnel pay plan; a contract with local physician or clinic for full-time coverage at specific hours and for emergencies; a contract with a local physician to conduct sick call, to be on call for emergencies and to examine newly admitted youth; arrangements with a nearby hospital to provide all needed medical services; and services rendered, without cost, by another agency or department or with costs prorated. Access to psychiatric and/or psychological services shall be provided in individual cases as needed. Nonmedical detention staff may issue any form of over-the-counter medication, providing the facility physician gives prior written approval to the facility for the issue.
 - Recommendations:
 - Hire or contract with a medical doctor.
 - Have a facility medical physician provide written approval to the facility before nonmedical staff can issue over-the-counter medication.
 - Hire or contract with an entity to provide psychiatric and/or psychological services.

Mental Health Services

Upon intake, all youth are administered a Massachusetts Youth Screening Instrument (MAYSI) by administrative staff. Scores on the MAYSI play a role in determining if youth are checked at a frequency of 10 or 15 minutes.

The facility does not employ any mental health staff. Mental health services are provided by a local community organization called Bridgeway, which is the area’s Screening, Assessment, and Support Services (SASS) provider funded by the Illinois Department of Human Services. The facility does not have any formal contract or agreement with Bridgeway. The facility will call Bridgeway when youth are presenting with suicidal gestures or ideation. In these cases, a SASS worker reports to the facility to conduct an assessment and make recommendations for placing a youth on close watch or pursuing hospitalization. While Bridgeway can provide ongoing individual services, this is a rare occurrence. The Bridgeway Vice-President reported that she did not think there were any youth at the facility receiving recurring services. Outside of the MAYSI, there is not any form of routine mental health assessment administered to youth by a mental health professional during intake.

It is clear that the volume of mental health services available to youth at Mary Davis Home is insufficient to meet minimum standards, much less best practice. County Detention Standards require that facilities employ or contract with qualified mental health professionals to address the needs of youth identified in

the mental health screenings as well as needs that arise during the period of confinement. These services must meet or exceed the community level of care. Community Detention Standards also require that youth with significant mental health needs be assessed and have a service plan developed.

Areas of Non-Compliance and Recommendations

- 2602.90 Mental Health Services states: “All facilities shall employ or contract with qualified mental health professionals to address the needs of youth identified in the mental health screening, as well as needs that arise during the period of confinement. Services shall meet or exceed the community level of care.”
 - Recommendations
 - Employ or contract with qualified mental health professionals to provide mental health services to youth at the facility.
 - Provide a mental health assessment for all youth.
 - Develop and implement service plans for all youth with mental health needs.

Clothing, Personal Hygiene, Grooming

The facility issues clothing to youth. Clothing and undergarments are scheduled to be laundered every day, a task that is managed by the overnight shift. The overnight shift is also responsible for discarding any clothing items that are damaged or stained.

The quality and cleanliness of clothing was a consistent complaint from residents that were interviewed. Youth shared they have received shirts with holes and stained undergarments. While not directly observed by auditors, the feedback was consistent. Female youth reported the quality and quantity of feminine hygiene products was poor and asked for additional options to be provided to them. Furthermore, some youth also indicate they were cold at times. The facility has a rule included in their Youth Orientation Manual that youth may only receive a shirt or a sweatshirt, but not both. This could easily be remedied by eliminating that rule and allowing youth the option of what to wear. Youth are permitted to shave, but per youth report and documentation, permission is only given one to three times per week.

Areas of Non-Compliance and Recommendations

- 2602.100 Clothing, Personal Hygiene, Grooming states: “. . . youth shall be permitted to shave as often as desired.”
 - Recommendations:
 - Purchase new sets of clothing and discard any clothing that is damaged or stained.
 - Provide youth with the feminine hygiene products that are requested.
 - Provide all youth with shirts and sweatshirts.
 - Permit youth to shave as often as desired.

Sanitation

The general appearance of the facility was clean during the inspection. The facility has a cleaning schedule that meets the requirements of the County Detention Standards, including stipulation that youth rooms be swept and mopped, and bathrooms be cleaned each day. Youth reports differed from established policy, however, and several youths indicated they do not get a chance to clean their rooms consistently.

Recommendations:

- Implement a tracking and monitoring process to ensure the cleaning of youth rooms matches the established schedule.

Youth Grievances

Mary Davis Home has an established process for handling youth grievances. Youth grievances are assigned to supervisors initially to address and then to either the Superintendent or Assistant Superintendent. Grievances have traditionally been stored in resident files after resolution. The Superintendent began maintaining a log in January 2022 after the release of the new County Detention Standards in this area. The grievances reviewed by the audit team appeared to have been addressed within required timeframes.

Youth grievance forms are kept in the control room, so youth must ask a staff member for a form. The facility does not have any grievance boxes available to youth in common areas.

Recommendations:

- Make grievance forms available to youth without having to obtain one from a staff member.
- Place youth grievance boxes in youth living units and common areas.

Food Services

Mary Davis Home has a kitchen on-site and employs one full-time cook. The cook has been on leave for approximately two months, so food preparation is managed by facility staff, including the Superintendent who has stepped in on weekends. The facility offers three meals per day and a snack to youth on all days except Sundays. On Sundays, there are two meals, the first being a large brunch in the later morning hours. The facility maintains a record of menus and any alterations. A list of youth with special diets was posted in the kitchen. The facility had protein options present for youth on vegetarian diets, however there were complaints by some youth that these options have not been present throughout their stay. The facility does utilize one resident as a youth worker in the kitchen to assist with clean-up. The youth reported he enjoyed working in dietary.

Most youth receive their meals as a group at tables outside the kitchen. The facility does make frequent use of a consequence called "Dining Area Restriction." Youth who receive this restriction are not permitted to eat in the dining area for a period of time and eat their meals in their rooms. This restriction can last quite a while, as the Youth Orientation Manual states the length of the restriction *"will be determined by your behavior, and you can request a review after the first two weeks is up."* There were also some complaints from youth stating the food delivered while on a Dining Area

Restriction is different or less in amount than the meals provided in the dietary. Administrators indicated food should be the same, with the only change being the type of tray it is delivered on and some circumstances in which youth may be given a meal such as peanut butter and jelly in place of the primary meal if there is a safety concern over youth access to a utensil. The frequency of this is difficult to determine, however, practice should be to always provide youth the same meals in the same amount regardless of behavior status unless directed by medical staff.

Areas of Non-Compliance and Recommendations

- 2602.110 Food Services states, “Meals shall be served and conducted in a group setting except when prohibited by security or medical needs. Three complete and balanced meals shall be served to each youth for each 24 hours of detention.”
 - Recommendations:
 - Implement a policy that specifically states all youth are to be delivered the same meal regardless of behavior status unless directed by medical personnel.
 - Limit the use of Dining Area Restrictions to instances where security or medical needs prohibit the serving and conducting of meals in a group setting.
 - Serve three meals on Sundays.

Education

The facility has one full-time teacher on-site from the Galesburg school district. Upon a youth’s admission, the facility Assistant Superintendent reaches out to a youth’s home school to obtain educational records and communicate to ensure youth get credit for educational services provided at the facility. The classroom itself is well-equipped and a welcoming space. Youth at the facility were very complimentary of the teacher, stating he is engaging and enjoyable to learn from. During the walkthrough, there was one youth in the classroom and the teacher was conducting a lesson on the stock market.

The program schedule provided shows four hours of in-person education each day. On Wednesdays, as was observed by auditors while on-site, youth engage in a study hall while staff training is taking place.

The County Detention Standards stipulate that the teacher-student ratio for general education needs to be 1:12 and 1:8 for special education students. Given the youth population at the facility – 17 on the date of the review and a reported average of approximately 20 youth - the facility does not meet the required ratios. Furthermore, County Detention Standards require five hours of education each day. As noted previously, some youth who have received “shifts” or are on a segregation status do not receive educational services. Facility administration reports they typically average one to two special education youth at any given time and the current facility educator is not a licensed special education teacher.

Areas of Non-Compliance and Recommendations

- 2602.230 Education states: “Teacher student ratios are at least 1:12 for general education and 1:8 for students with Individualized Education Programs (IEPs). Qualified special education staff are assigned to youth with special education status and special education testing is available for youth in custody. There shall be a minimum of five hours of instruction per day.”

- Recommendations:
 - Hire a sufficient number of teachers, including special education teachers, to ensure the required ratios for general and special education are met.
 - Identify a process to have a substitute teacher in the event of a teacher absence.
 - Adjust the daily schedule to provide 5 hours of education to all youth each day.

Additional Observations

The facility offers the required 40 hours of pre-service training to new employees. The facility has hired eight new employees since the start of 2021. Background checks had been conducted on the new employees, consistent with new additions to County Detention Standards related to hiring decisions and consistent with PREA standards. The facility has begun conducting background checks on employees who have been with the agency more than five years. That project is ongoing. Samples of training records were reviewed and included required PREA training. The facility utilizes Relias for staff PREA training.

The facility has a draft of a new policy and procedure manual, as the current manual is outdated and inconsistent with current vision and practice. The new manual has yet to be approved. One of the new policies is a comprehensive PREA-specific policy.

Recommendations

Section	Recommendations
Admissions Policies and Procedures	<ul style="list-style-type: none"> ● Eliminate the use of strip searches as a standard process during intake. ● Implement the PREA Risk for Victimization Assessment for youth within 72 hours of admission and periodically throughout a youth’s confinement. ● Hire a PREA Officer to supervise facility compliance with PREA standards.
Personnel	<ul style="list-style-type: none"> ● Budget for more supervisory staff to ensure adequate coverage is maintained. ● Ensure a supervisor is present for all shifts during youth waking hours. ● Alter supervisor schedules to maximize coverage throughout the week. ● Alter counselor schedules to maximize coverage throughout the week.
Discipline	<ul style="list-style-type: none"> ● Eliminate the use of “shifts” as a behavioral consequence and replace them with a short-term timeout process that releases youth as soon as they demonstrate they are calm and able to return to programming. ● Eliminate the current practices associated with Administrative Plans and the Harvest Wing.

	<ul style="list-style-type: none"> • Ensure youth have adequate bedding and materials in their rooms. • Implement policy that prohibits the use of confinement longer than 4 hours without administrator approval and development of an individualized plan. • Enhance the documentation of youth confinement time to include: <ul style="list-style-type: none"> ○ Written reports that indicate the reason for confinement. ○ The start and end times of the confinement. ○ Attempts to de-escalate the youth and return them to regular programming. • Immediately end any practice of turning off water as a preventative measure and implement a policy that prohibits this practice. • Revise training materials and policy to explicitly prohibit the use of pain compliance and pressure point control.
Education	<ul style="list-style-type: none"> • Hire a sufficient number of teachers, including special education teachers, to ensure the required ratios for general and special education are met. • Identify a process to have a substitute teacher in the event of a teacher absence. • Adjust the daily schedule to provide 5 hours of education to all youth each day.
Medical and Health Care Services	<ul style="list-style-type: none"> • Hire or contract with a medical doctor. <ul style="list-style-type: none"> ○ Have a facility medical physician provide written approval to the facility before nonmedical staff can issue over-the-counter medication. • Hire or contract with an entity to provide psychiatric and/or psychological services.
Mental Health Services	<ul style="list-style-type: none"> • Employ or contract with qualified mental health professionals to provide mental health services to youth at the facility. <ul style="list-style-type: none"> ○ Provide a mental health assessment for all youth. ○ Develop and implement service plans for all youth with mental health needs.
Clothing, Personal Hygiene, Grooming	<ul style="list-style-type: none"> • Purchase new sets of clothing and discard any clothing that is damaged or stained. • Provide youth with the feminine hygiene products that are requested. • Provide all youth with shirts and sweatshirts. • Permit youth to shave as often as desired.
Sanitation	<ul style="list-style-type: none"> • Implement a tracking and monitoring process to ensure the cleaning of youth rooms matches the established schedule.
Youth Grievances	<ul style="list-style-type: none"> • Make grievance forms available to youth without having to obtain one from a staff member. • Place youth grievance boxes in youth living units and common areas.
Food Services	<ul style="list-style-type: none"> • Implement a policy that specifically states all youth are to be delivered the same meal regardless of behavior status unless directed by medical personnel.

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| | <ul style="list-style-type: none">• Limit the use of Dining Area Restrictions to instances where security or medical needs prohibit the serving and conducting of meals in a group setting.• Serve three meals on Sundays. |
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