

DEPARTMENT OF SOCIAL SERVICES

Community Care Licensing Division
Statewide Children's Residential Program
Out-of-State Certification Unit

**OUT-OF-STATE PRE-CERTIFICATION REVIEW****WALDEN SCHOOL**

848 Central Street
Framingham, Massachusetts 01171

FACILITY VISIT DATE(S): June 29, 2006

OUT-OF-STATE CERTIFICATION UNIT (OSCU) STAFF MEMBER:

Olaniyan Akyeem, Associate Governmental Program Analyst

PURPOSE OF VISIT:

Walden School (learning center for deaf children) is seeking certification with the State of California, Department of Social Services, Community Care Licensing Division, Out-of-State Certification Unit. The purpose of this visit is to verify facility compliance with California licensing standards in order to certify the facility to accept and treat California children and youths.

CALIFORNIA PLACING AGENCIES:

San Diego County is currently the only California agency contracted for placements at this time.

FACILITY & PHYSICAL PLANT OVERVIEW:

Walden School is located in the eastern region of Massachusetts, approximately 20 miles west of Boston in the small town of Framingham; a unique blend of urban and rural qualities. The 13,000 square foot campus is outfitted with recreation, dining, counseling and classroom areas. Students have access to the Learning Center with is fully equipped with playgrounds, ball field, pools, and a modern gymnasium. The residential living units provided adequate living space fully equipped with separate staff office space and indoor/outdoor recreational activities. Overall physical plant appeared to be clean, safe and in good repair. The facility has a licensed capacity of 40, and the census was 24 at the time of visit.

DELAYED EGRESS / LOCKED PARAMETERS:

There are no delayed egress systems, or locked doors or parameters in use at Walden School. Note: Locked doors or parameters are a violation of California licensing standards, and the use of delayed egress requires the facility to obtain a waiver from the OSCU, which is approved only under limited circumstances.

TIME OUT ROOMS / QUIET ROOMS:

Facility does not utilize structured time out or quiet rooms. However, the facility does have designated rooms without doors where students can go on a voluntarily basis to have quiet time alone when needed.

FIRE CLEARANCE:

Fire clearances are conducted by the Town of Framingham Fire Department on an annual basis. The last fire inspection was conducted on March 21, 2006. No violations were noted.

HEALTH DEPARTMENT CLEARANCES:

The Commonwealth of Massachusetts Office For Children conducts annual health inspections for the facility. The latest review was conducted on March 24, 2006. There were no concerns or issues identified in the Health Services report.

EMERGENCY DISASTER PLAN:

Walden School conducts facility wide semi-annual emergency disaster drills. These drills pertain to fire, bomb threat, and earthquake preparedness. Evacuation drills are documented and debriefing occurs among the management team.

MASSACHUSETTS LICENSING / COMPLAINTS:

The facility is licensed and regulated by The Commonwealth of Massachusetts, Department of Early Education and Care, formally known as the Office of Child Services. Licensing evaluations are conducted every two to three years depending on the history of compliance of the program.

The license is for "Group Care Program." There are four (4) licensed residential living units on campus. Each license is to serve the following: Walden School - capacity: 24 male or female, ages 8-21; Brown House – capacity: 5 male or female, ages 13-21; Prospect House – capacity: 5 male or female; and Green House – capacity: 5 male or female. There are three separate license numbers. Two of the 4 program units are licensed under the same number; the other two have their own individual license number.

The last facility evaluation was conducted on December 28, 2004. A copy of the facility evaluation indicated minor deficiencies in the area of records and physical plan issues. A plan of correction was received by March 2005 addressing each non-compliance issue.

On May 2, 2005, contact was made with the Massachusetts licensing representative who reported that there have been no substantiated complaints against Walden School in the last year. It is further reported that the facility is currently operating under full licensing status, and remains in compliance under The Commonwealth of Massachusetts.

Complaints: All complaints pertaining to licensing regulations are regulated and investigated by The Commonwealth of Massachusetts Department of Early Education and Care. The licensing evaluator will conduct a preliminary investigation within 10 days of the receipt of complaint. Any violation resulting from the investigations will be addressed within the Department.

All serious complaints such as: abuse and neglect are referred to The Commonwealth of Massachusetts Department of Social Services, Child Welfare Agency. These complaints are assigned to special investigators who work with both the licensing agency and local law enforcement authorities for possible District Attorney prosecution.

PROGRAM OVERVIEW / PHILOSOPHY:

The approach to changing behavior utilized at Walden School is based on the belief that each child comes to the program with his/her own unique set of life experiences and view of the world. They have different strengths, needs, likes, dislikes, fears and expectations. What is true of all those referred to our program is that they been hurt in some way, and they have experienced failures in previous educational and social settings. Approaches to guide children and youths through a process of change must therefore be individualized and must always have respect and compassion as their foundation.

Circle of Courage: This is a Native American strength-based model for youth development built upon the belief that children must always be treated with respect and dignity. Walden School has used this circle as a foundation for its program of healing and growth. This program provides a structure in which to identify strengths and needs and establish goals in the context of four core values: Belonging, Generosity, Mastery and Independence.

The Circle of Courage program defines treatment as a path of self exploitation and personal growth, and stages within the program to help structure the work being done by the child and his/her team. These stages should not be perceived as program levels. They are not linked with privileges, nor are they “earned” or “lost” based on compliance. Rather, the Circle of Courage program is a treatment curriculum. Each stage offers guidelines and activities that enable residential, educational, and clinical staff to work together with the child and family to identify and achieve personal goals. The program is designed to build upon existing strengths, foster a sense of community, provide opportunities to develop and practice new skills, and formally celebrate progress.

It is also noted that Walden School does not utilize a single formula for change that applies the same expectations, rewards, and consequences for all. Individual approaches are developed based on who that child is and where he/she is in the process of change. Program components include academic classes, group meetings, and structured activities developed to provide experiences which allows the children to learn and practice new behaviors; on-going support and services to the family; individualized treatment plans; skills building plans that identify student strengths, goals and coping strategies; meaningful rewards and logical consequences with rationales that can be clearly explained to and understood by the child; and degrees of close supervision based on individual safety needs.

To be effective, services must be provided in the language of children and with an understanding of respect for their culture. Thus, American Sign Language (ASL) is the language used in Walden School, and it is considered essential that at least 50% of the staff be deaf. In addition, because children learn through relationships with others, Walden School staff must be able to model self-awareness, respect, openness, teamwork responsibility, and honesty in their day-to-day interactions with the children and with each other.

PROGRAM STATEMENT:

Walden School is a non-profit, nationally-recognized educational institution which provides comprehensive treatment and educational services for deaf children. Students receive highly individualized care and therapy in a structured, supportive setting.

The goal of Walden School is to enable children to function in less-restrictive home and school environments, and to prepare them to become productive members of the community.

The residential program at Walden School is staffed by a team of childcare workers who work with students to develop their independent living, social and recreational skills. The residential program consists of the following:

The Evening Program: Structured evening schedules focuses on both exposing students to wide variety of recreational and leisure activities, as well as helping students develop necessary independent living and social skills. Evenings are divided into four time segments. Students end their school day with a community meeting that residential, clinical and educational staff attend. Students move from community meeting into a recreational time. This includes exposure to, as well as instruction in, the many after school sport and related activities available at the Learning Center on campus. After recreation time, students focus on such independent living skills as chores, laundry, homework, and cooking. When the evening meal is finished, students participate in social skills activities which include games, role plays, videos and discussion groups. Students wind down their evening with a focus on leisure activities such as quiet board games, story time or independent reading.

The Weekend Program: The weekend program focuses on the development of structuring leisure time. Weekends begin on Friday afternoon with meetings to discuss the various activities planned for the coming weekend. In addition to general housekeeping chores (cleaning common areas of the dormitory), students help structure and participate in various recreational and leisure activities which often include outings. Students learn the importance of structuring their own leisure time as they are encouraged to sample different hobbies and pursue personal interest. Weekends come to a close with a community meeting on Sunday afternoon to review the events of the weekend and students help to generate a list of potential activities for the following weekend.

Consistent throughout the residential program is constant attention and adherence to each student's individual treatment plan. All activities chosen are done so with these plans in mind.

EDUCATIONAL PROGRAM:

(See Education / Vocation section below)

Transitional Services: As students progress through the program at Walden School, there are a variety of options available to them to assist in their transitioning back to their home environment and/or a less restrictive educational setting. A student is determined to be ready for such services when the following can be documented:

- The student does not display behaviors that pose serious threats to self or others.
- The student has demonstrated the ability to cope with increased stress and /or frustration without serious emotional/behavioral regression exhibited by severe withdrawal, self harm, or verbal or physical aggression.
- The student has demonstrated safe and effective strategies for managing change.

For a transition to a less restrictive school program, in addition to the above:

- The student has demonstrated the ability to follow a school schedule, participate in class activities, work cooperatively with adults and peers, and complete independent work.

For a transition to the home, in addition to the above:

- The student has a series of successful weekend home visits, free of aggregation and destruction and demonstrating safe and cooperative behaviors.

When the above criteria have been met, an individualized plan will be written to identify steps toward a return to home and/or a less restrictive school setting. Depending on the needs of a student, this plan may include the following:

- One or more academic classes to be taken in the age appropriate program on the main campus of The Learning Center (TLC).
- Full academic programming at TLC while continuing to reside at Walden School.
- A change from Walden School residential to Walden School day program only.
- A change from 12 month to 11 month Walden School programming.
- Partial or full participation in the Walden School transitional group home.
- Partial or full participation in The Learning Center Middle/High School residence.
- Intensive in-home family therapy and support as preparation for or in conjunction with a return home.

EMERGENCY INTERVENTION PLAN:

Walden School has implemented the Professional Assault Crisis Training (Pro-Act), intervention technique formally known as Professional Assault Response training, PART.

Pro-Act is a nationally recognized intervention, which is centered around training designed to minimize the risk associated with the emergency treatment of assaultive behavior. It is a comprehensive, systematic approach to the management of assaultive behavior, emphasizing the role of supervision of behavior, strongly worded and strictly enforced policies, regular in-service trainings and continuous upgrading of skills and knowledge is key.

Ongoing training and refresher courses have resulted in a decrease in the number of restraint incidents. It is reported that the total number of incidents resulting from physical intervention has been reduced up to 95% within the last four years.

Follow-up: Along with the application, Walden School will need to develop an Emergency Intervention Plan to fully address issues surrounding restraints, time limitations, run-away policy, etc. (Issue to be addressed in the Plan-of-Correction.)

ADMISSIONS/INTAKE PROCEEDURE:

Walden School provides services for deaf adolescents, males and females, between the ages of 8 and 21. Massachusetts referrals are given priority, but out-of-state students are accepted as beds become available. In addition to Massachusetts, Walden School has provided services for students in several states.

The admission process formally begins when the Admissions Department /Intake Coordinator receives a referral packet from a placing agency for review. The decision for acceptance is made by an admission committee that may include several staff from, administration, clinical,

educational, medical etc. Upon admission, the new student will be assigned to a mental health therapist, and family therapy services are provided.

Follow-up: A review of client file was conducted. No admissions agreement between the California placing agency and Walden School was found in the record file. (Issue to be addressed in the Plan-of-Correction.)

DRUG TESTING AND CLIENT SEARCHES:

Walden School does not conduct drug testing. Any child needing testing is only conducted by the child's assigned pediatrician.

Searches are prohibited. However, Walden School does have a policy for a "bag-check". Bag checks are initiated when there is cause for concern. If a student is threatening to bring a weapon back to school, or if there is reason for staff to believe that the student is returning with something unsafe, these are examples for a need for a bag-check. Bags are to be checked in the presence of the student and made the least intrusive as possible.

On duty staff will check the student bag upon return from an overnight stay off campus (home, friend's house, etc.)

CLIENT PERSONAL RIGHTS:

Although the evaluation did not reflect any violation of student rights, this will need more follow-up in the area of documentation. Student files did not appear to have documentation of personal rights signed by the student and authorized representatives. It is further noted that some students may not be functioning at a level to fully understand the language listed in his/her personal rights; however, it should be documented and signed by the authorized representative indicating so. It is also noted that posting of the personal rights for the convenience of student review was not observed in various areas of the facility and on living units. (Issue to be addressed in the Plan-of-Correction.)

CLIENT GRIEVANCE PROCEDURES:

The Walden School policy and procedures regarding complaints state that all children and families will be informed of their right to present complaints. This information is included in the child's Grievance Procedure document and the Grievance Procedure for parents and guardians.

Students are informed so that if a staff person scares, hurts, or does something they think is wrong, to tell someone right away, (i.e., LCSW, supervisor, therapist, administrative staff, etc.). Students are informed that a meeting with that staff person will be conducted and the student is encouraged to attend if they decide. The student will have a follow-up meeting to discuss the outcome of his/her complaint.

Parents / Guardians: Have the option of contacting one of four of the designated administrative staff, including the Executive Director to lodge a complaint. The grievance form provided to parents and guardians have listed contact persons and phone numbers. Upon receipt of a complaint, one or more of these designated staff will conduct an investigation, the specifics of which will be shared with the complainant. Following the investigation, the investigator will report back to the complainant, the findings and plan of action.

MEDICAL, DENTAL, & NUTRITIONAL SERVICES:

Walden School has an on-site nurse's station administered by Licensed Registered Nurses. There are at least four full-time nurses on campus, Monday-Friday with one in the AM, and one in the PM during the weekend hours. In case of a medical emergency, the facility utilizes the local hospital which is near the facility campus.

The Nurses Department is a critical component of Walden School. The Director of Health Services is a member of Walden School administration team. Nursing is represented at the clinical meetings of each student, and on-duty nurses conduct evening and weekend rounds to support students and staff.

All medications and treatments are administered by registered nurses with limited exceptions such as holidays and extended field trips. In those instances medications are given by experienced staff that have been trained by the nursing department.

Walden School also employs a full-time Medical Case Manager, who works closely with the nursing departments. She schedules medical and dental appointments, accompanies students to appointments, and ensures appropriate follow-up.

The Nursing Department also works closely with the consulting psychiatrist, the consulting pediatrician, nutritionalist, food service manager and the out-patient health care providers, who routinely service Walden School students.

TREATMENT SERVICES (COUNSELING, GROUPS, THERAPY ETC):

The clinical team includes a Clinical Director, a team of Master level therapists, a counseling clinical psychologist, and a consulting psychiatrist. In addition, all staff who work with the children receive on-going training on clinical issues and basic counseling skills.

All Walden School students receive individual therapy. Many are involved in groups as well. Family therapy and support services are considered essential and are arranged on an individual basis depending upon needs and location. They may be provided at Walden School, in the family home, or via phone conferencing when distance limits the opportunity for direct contact. The clinical team also provides crisis assessment and management of emergency psychiatric referral and coordination.

A multidisciplinary team led by the Clinical Director develops treatment plans for each student. These plans address the therapeutic needs of the student and identify strategies for addressing those needs. The plans are then reviewed and revised approximately every 8 to 12 weeks.

The therapist also participates with students, educational staff and residential staff in the development of Skills Building Plan that identify strengths, coping strategies, and establishing individual goals.

EDUCATION / VOCATION SERVICES:

The Walden School educational program offers students a full range of academic and enrichment courses, and includes life skills, social skills, and work skills training. The services are individualized based on students' needs and in accordance with the goals of the Individualized

Educational Plan (IEP). Classes are designated to meet students at their current learning level and take them to higher levels of academic achievement.

The typical classroom has a 2:1 student to staff ratio, although there may be times when that ratio is higher or lower as needs vary. Students are in self-contained classrooms with teachers and assistants trained to address their therapeutic, behavioral, and educational needs. As students progress, they may begin taking classes in the Learning Center's elementary, middle, or high school programs. Older students are often involved in a work readiness program designed to develop work behaviors and expand the adolescent's understanding of the world of work. When appropriate, this may lead to supervised on-campus or community employment.

Educational staff works closely with residential and clinical staff to ensure program consistency.

BEHAVIOR MODIFICATION SYSTEM:

Walden School does not utilize a level or point system. Behavior management generally consists of the following components:

- Organized classes and activities
- Development of individual treatment plans use to identify needs and interventions
- Contracts and Management Plans, identifies what the student agrees to work on
- Meaningful rewards and logical consequences

CRIMINAL RECORD CLEARANCES / SUBSEQUENT ARREST:

The State of Massachusetts does conduct criminal record checks for all Walden School employees. All staff hired by Walden School are required to submit a criminal records check prior to employment. A cleared criminal history must be obtained before any staff can be in contact with students. A national subsequent arrest check is also conducted three years following the initial date of hire and every three years thereafter. Along with the subsequent criminal inquiry, there is a DMV records check.

A sample portion of personnel file records were conducted to ensure that all necessary documentation of approved criminal records checks were approved for hire. Records review revealed no issues of concern.

STAFF ORIENTATION and TRAINING:

Within the first three days on the job, each employee will be handed a New Employee Orientation Checklist. The supervisor will review the check list with the employee. Some of the orientation will be completed individually and some will be completed in small clusters of 2-3 employees, depending on the amount of employees recently hired. The checklist should be completed within the first 30 days of employment. However, trainings may take up to 6 months before they are completed.

Orientation consists of a combination of material. There may be tours, lectures, introductions, readings, assignments, role-playing and hands-on demonstrations.

Each supervisor will be responsible to ensure that the New Employee Orientation Checklist has been completed and filed in the business office of Walden School. Not limiting to, some of the ongoing trainings are as follow:

- Pro-Act / PART
- First Aid
- OSHA
- CPR
- 51-A Training
- Fire Safety
- Med Education
- Professionalism and Boundaries
- Impact Awareness
- Medication Administration

All training hours are documented in staff record logs and electronically in a data system. File reviews revealed that Walden School has met all training hours and requirements to meet California licensing standards.

SCOPE OF CERTIFICATION REVIEW:

Assessment of critical operation issues including programming, intake and discharge procedures, discipline policy, emergency intervention techniques, medical procedures, staff and client file review, facility file review, staff interviews, observation of program and daily activities, criminal record review, personal rights, food services, staff trainings, emergency disaster plan, fire clearance, and all issues pertaining to physical plant.

OUT-OF-STATE CERTIFICATION FINDINGS / VIOLATIONS:

Develop a Plan-of-Correction (POC) and implementation process that clearly responds to the issues of Out-of-State Certification review of Walden School. The POC must include but is not necessarily limited to, the following elements:

1. Develop a plan to ensure Walden School follows through with the Out-of State Certification requirements which includes Certification Application and include Emergency Intervention Plan (EIP) as pursuant to California Family Code 7911.
2. Develop a plan to ensure special incident reports are submitted in a timely manner as pursuant to California Family Code 7911.1(a).
3. Develop a plan to ensure the Personal Rights of the child are addressed in a language he/she understands. Personal rights POC shall include, but are not limited to the following:
 - Personal Rights document shall be signed by the student, if applicable
 - Personal Rights document shall be signed by the authorized representative
 - Post a copy of the Personal Rights document in the facility and/or living units for review by the students
4. Maintain a copy of the California Students Admissions Agreement in the child's file.

5. Develop a plan to ensure all staff responsible for direct care and supervision has a copy of valid first aid training / certificates in the personnel files.

CERTIFICATION DECISION:

Walden School has met the requirements for Pre-Certification and is eligible to receive California placements at this time. Walden School will be offered an opportunity to provide a POC to the issues addressed above. The full certification decision will be made following review of the submitted POC. Please submit the POC by **August 31, 2006** to:

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