



**pennsylvania**  
DEPARTMENT OF HUMAN SERVICES

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**  
**MAILING DATE: March 2, 2017**

Dr. Randy A. Ireson  
Glen Mills Schools  
P.O. Box 5001  
Concordville, PA 19331

RE: Jefferson / Fillmore Hall  
License #112960

Dear Dr. Ireson:

As a result of the Department of Human Services' licensing inspection on December 5, 2016 of the above facility, the violations with 55 Pa.Code Ch. 3800 (relating to Child Residential and Day Treatment Facilities) specified on the enclosed License Inspection Summary were found.

All violations specified on the enclosed License Inspection Summary must be corrected by the dates specified on the License Inspection Summary and continued compliance with 55 Pa.Code Ch. 3800 must be maintained.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Miller".

Kevin Miller  
Child Residential Licensing Manager

Enclosure  
Licensing Inspection Summary

**VIOLATION REPORT  
CHILD RESIDENTIAL LICENSING - 55 Pa.Code Chapter 3800**

Facility Name: JEFFERSON FILLMORE HALL		License Number: 11286
Address: 185 GLEN MILLS ROAD, GLEN MILLS, PA 19342		County: Delaware
Director: Dr. Randy Ireson		Region: SOUTHEAST
Legal Entity Name: GLEN MILLS SCHOOLS		
Legal Entity Address: P.O. BOX 5001, CONCORDVILLE, PA 19331		
Certificate(s) of Occupancy NM  NM		
Program Type: Residential Services	Licensed Capacity: 68	Number of Children Served: 67
Type of Inspection: Partial	BHA Docket Number:	Notice: Unannounced
Reason(s) for Inspection(s) Complaint		
On-Site Inspections Dates and Department Representatives On-Site 12/05/2016: Taylor, Kahisha; Wooters, Sandra; Manson, Trina; Delaney, Alesia		
Off-Site Inspection Dates and Inspectors, if Applicable		
Other Details Partial or Full Triggers: Random Indicators:		
Child Demographic Data as of Inspection Dates		
Age of Children: 0 to 5 years: 0 6 to 13 years: 0 14 to 17 years: 54 18 to 21 years: 13	Number of Children who: Are Adjudicated Delinquent: 0 Are Dependent: 0 Have Mental Illness: 0 Have an Intellectual Disability: 0 Have a Physical Disability: 0	

Licensing Inspection Summary: 11206 - 12/05/2016 - Taylor, Kahisha  
 Facility Name: JEFFERSON FILLMORE HALL

**1. REGULATION 55 Pa.Code §3800**

3800.32(b) - A child may not be abused, mistreated, threatened, harassed or subject to corporal punishment.

**2a. DESCRIPTION OF VIOLATION**

On [REDACTED] Child #1 was assaulted by several peers on 2 separate occasions. Child #1 sustained a mid concussion, laceration over [REDACTED] eye and bruised ribs as a result of these assaults.

**3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)**

*Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.*

The Glen Mills Schools understands the importance of Pa Code Title 55 3800.32(b) and will not tolerate the abuse, mistreatment, threats, harassment, or corporal punishment of a child. Jefferson/Fillmore Hall staff performed an internal investigation by interviewing the staff and students involved in the alleged incident on [REDACTED]. During the internal investigation, Child #1 attempted to assault several other students and had to be physically restrained by staff due to [REDACTED] threatening and aggressive behavior. During the investigation, the other student involved admitted to fighting Child #1, so the Team Leader and AM Senior counselor determined that the laceration on Child #1's eye was a result of the fight. In response to this violation, the Team Leaders of Jefferson/Fillmore have addressed all of their students on the acceptable behavior requirements as identified in the Glen Mills Schools Student Handbook. Each student receives this handbook upon admission to our campus. The Team Leaders emphasized to the students the importance of treating one another appropriately and making sure that they are aware that no student has a right to hurt another student. They reiterated that our students are never permitted to touch one another when dealing with peer to peer behaviors. The Team Leaders of Jefferson/Fillmore Hall are ultimately responsible to make sure that no student is abused, mistreated, threatened, harassed, or subject to corporal punishment. In addition, these topics will continue to be discussed in our Guided Group Interaction, School Wide Positive Behavior supports program, and our Evidence Based Classes.

Repeat Violation: Yes

Date(s) of Previous Violation(s):

11/24/2015

Signature of Legal Entity Representative  
 (Required on EVERY Page)

*Randy Ireson*

Printed Name and Title of Legal Entity Representative  
 (Required on EVERY Page)

Dr. Randy A. Ireson

Date February 17, 2017

**DEPARTMENT USE ONLY - FACILITIES MAY NOT WRITE BELOW THIS LINE!**

The above plan of correction is approved as of

2/24/17  
 (Date)

Plan of correction Implementation status as of

2/24/17  
 (Date)

The above plan of correction was approved by

KMM  
 (Initials)

- Fully Implemented  
 Partially Implemented - Adequate Progress  
 Partially Implemented - Inadequate Progress  
 Not Implemented

Licensing Inspection Summary: 11286 - 12/05/2016 - Taylor, Kahisha  
 Facility Name: JEFFERSON FILLMORE HALL

1. REGULATION 55 Pa.Code §3800  
 3800.32(c) - A child has the right to be treated with fairness, dignity and respect.

2a. DESCRIPTION OF VIOLATION  
 Child #1 was fearful that peers on the unit were going to jump █ Child #1 disclosed to Staff Member A that █ did not feel safe on that unit. Child #1 reported that Staff Member A told █ to stop being childish. Staff Member A admitted that █ did not protect Child #1 after Child #1 reported feeling unsafe to █.  
 During an initial investigation of Child #1, it was discovered that Child #2 was confronted by Staff Member B in the library sometime in the beginning of █ Staff Member B did not like the response of Child #2 to the confrontation. Staff Member B grabbed Child #2 by the shirt and shoved Child #2 through a chair. There were witnesses to this incident.

3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)  
 Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.

The Glen Mills Schools understands the importance of Pa Code Title 55 3800.32(c) which states that a child has the right to be treated with fairness, dignity, and respect. Child #1 shared with the BHSL during █ interview that █ told Staff Member A █ did not feel safe. This contradicts the information Staff Member A had previously received from Child #1, where █ only shared █ was not getting along with █ peers. It was determined by Staff Member A that Child #1's health and safety was not in jeopardy, so the student was not transferred at that time. Child #2 made an allegation to BHSL representatives during an initial investigation of Child #1 where █ alleged mistreatment from over 2 months ago. This was the first time Glen Mills Schools staff were made aware of this allegation. In response, Staff Member B was immediately placed on a plan of supervision where █ was not to have contact with Child #2. Child #2 was also transferred to another living unit for █ safety and wellbeing. The Glen Mills Schools takes this violation very seriously. The Team Leaders of Jefferson/Fillmore addressed all of their staff in each of their weekly team meeting following the incident in question. They discussed the importance of providing a safe and healthy environment for our students. In addition, all of the staff members in Jefferson/Fillmore were given a booster Behavioral Intervention Training course on November 30, 2016 and December 7, 2016. Please see Attachment A for the sign in sheets from the booster training for all the staff in Jefferson/Fillmore. The Glen Mills Schools will continue to train our staff on the importance of this regulation and will encourage the safety and well-being of our children.

Repeat Violation: No	Date(s) of Previous Violation(s):		
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Signature of Legal Entity Representative  
 (Required on EVERY Page) *Randy Ireson*

Printed Name and Title of Legal Entity Representative  
 (Required on EVERY Page) Dr. Randy A. Ireson

Date February 17, 2017

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The above plan of correction was approved by <u>YMM</u> (Initials)	<input type="checkbox"/> Fully Implemented <input checked="" type="checkbox"/> Partially Implemented - Adequate Progress <input type="checkbox"/> Partially Implemented - Inadequate Progress <input type="checkbox"/> Not Implemented

Licensing Inspection Summary: 11296 - 12/05/2016 - Taylor, Kahisha  
Facility Name: JEFFERSON FILLMORE HALL

**1. REGULATION 55 Pa.Code §3800**

3800.32(k) - A child has the right to appropriate medical, behavioral health and dental treatment.

**2a. DESCRIPTION OF VIOLATION**

Child #1 was physically assaulted by peers on [REDACTED] at approximately 2:30pm. Child #1 sustained a laceration over [REDACTED] that was continuously bleeding. The facilities nurse was notified and asked staff to send her a picture of the laceration. The facilities nurse made the decision not to treat Child #1 at that time. Child #1 was not treated by nursing until 7:00pm that evening. The laceration bleed continuously throughout the day. Child #1 was sent to the ER a few days later to be accessed by the ER. It was determined that Child #1 sustained a mild concussion, a laceration that needed stitches and an injury to [REDACTED] right hand.

**3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)**

*Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.*

The Glen Mills Schools understands the importance of Pa Code Title 55 3800.32(k) and will not tolerate the withholding of appropriate medical, behavioral health and dental treatment. It was determined through an internal investigation on [REDACTED] that Child #1 was involved in a fight that resulted in a laceration above [REDACTED] right eye. Due to the injury from the fight, first aid was administered by a staff member present by applying pressure to the laceration and by contacting the on call nurse. Although it was shared with Bureau of Human Services Licensing Representative by Child #1 that the laceration bled throughout the day, it was determined by Glen Mills Staff that the laceration stopped bleeding after pressure was applied. The on call nurse arrived on campus where she applied 4 steri-strips to close the laceration, provided ice, administered 600 mg of Ibuprofen, and performed a neurological check that was determined to be within normal limits. The same on call nurse evaluated Child #1 on [REDACTED] where the student was offered off campus medical attention. Due to Child #1's age (18), [REDACTED] was able to and did decline any further treatment. On Monday [REDACTED] per our Glen Mills Schools Restraint Policy Child #1 was seen at the Glen Mills Schools Health Center by one of the Doctors for a physical examination. It was during the physical examination where Child #1 first alleged to the Doctor that [REDACTED] was kicked in the head by another student. The Doctor immediately recommended that Child #1 be taken to Riddle Hospital Emergency Room to be evaluated. Child #1 was transported to Riddle Hospital by a Glen Mills Schools Counselor/Teacher and was seen by Emergency Room medical staff. Child #1 was discharged by [REDACTED] committing jurisdiction and never returned to the Glen Mills Schools campus. The Glen Mills Schools takes this violation very seriously as the on call nurse has been terminated due to this incident, as well as other work performance issues. In response the Glen Mills Schools Head Nurse has addressed all of her staff on the importance of providing appropriate medical treatment and arriving on campus within a reasonable timeframe. It is the responsibility of the on call nurse to assess the situation and determine the appropriate medical treatment.

Repeat Violation: No

Date(s) of Previous Violation(s):

Signature of Legal Entity Representative  
(Required on EVERY Page)

*Randy Ireson*

Printed Name and Title of Legal Entity Representative  
(Required on EVERY Page)

Dr. Randy A. Ireson

Date February 17, 2017

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2/23/17  
(Date)

Plan of correction Implementation status as of 2/24/17  
(Date)

- Fully Implemented  
 Partially Implemented - Adequate Progress  
 Partially Implemented - Inadequate Progress  
 Not Implemented

The above plan of correction was approved by

KMM  
(Initials)

Licensing Inspection Summary: 11298 - 12/05/2016 - Taylor, Kahisha  
 Facility Name: JEFFERSON FILLMORE HALL

**1. REGULATION 55 Pa.Code §3800**

3800.142 - If the health and safety assessment in § 3800.141 (relating to health and safety assessment) identifies a health or safety risk, a written plan to protect the child shall be developed and implemented within 24 hours after the assessment is completed.

**2a. DESCRIPTION OF VIOLATION**

Staff Member A did not create a plan of safety for Child #1 after Child #1 reported to Staff Member that [redacted] did not feel safe around peers. Child #1 was physically assaulted by those peers a few days later.

**3. PLAN OF CORRECTION (POC)** (Attach pages as necessary. Remember that you must sign and date any attached pages.)

*Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.*

The Glen Mills Schools understands the importance of Pa Code Title 55 3800.142 which states that if the health and safety assessment in 3800.141 (relating to health and safety assessment) identifies a health or safety risk, a written plan to protect the child shall be developed and implemented within 24 hours after the assessment is completed. Child #1 shared with the BHSL during [redacted] interview that [redacted] told Staff Member A [redacted] did not feel safe. This contradicts the information Staff Member A had previously received from Child #1, where [redacted] only shared [redacted] was not getting along with [redacted] peers. It was determined by Staff Member A that Child #1's health and safety was not in jeopardy, so Staff Member A did not develop a written plan. In addition, an internal investigation performed by the Glen Mills Schools a few days later determined that Child #1 was involved in a fight not an assault and that Child #1's out of control, aggressive, and a threat to [redacted] and others, which resulted in [redacted] being physical restrained. It is the practice at the Glen Mills Schools that if a health and safety assessment identifies a health or safety risk, a written plan to protect that child shall be developed and implemented within 24 hours after the assessment is completed. It is also the practice at the Glen Mills Schools to have a working knowledge of the Child Abuse Recognition and Reporting Training. The Team Leaders of each licensed building are ultimately responsible to make sure that if necessary a written plan to protect the child is implemented within 24 hours. The Assistant Group Living Director reiterated these processes with all the Team Leaders of the licensed buildings on campus. The Team Leader of each licensed building discussed the health and safety assessment/plans as it pertains to student safety in the weekly team meeting following receiving this violation. The Director of Admission also reiterated this process with all of his medical staff.

Repeat Violation: No	Date(s) of Previous Violation(s):		
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 (Date)

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- Not Implemented