



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

March 25, 2019

Mrs. Carolyn Seagraves, 2nd Vice President
The Glen Mills Schools
185 Glen Mills Road
Glen Mills, Pennsylvania 19342

RE: Glen Mills Schools – 14 Licensed Facilities
185 Glen Mills Road
Glen Mills, PA 19342

Dear Mrs. Seagraves:

Please be advised that as a result of the Department of Human Services' (department) investigations between December 2018 and March 19, 2019, the department has made the decision to issue an Emergency Removal Order requiring that all residents at Glen Mills Schools' Licensed Facilities be removed.

The department's decision to take this action is outlined in the attached documentation and should be carefully reviewed as it is a matter of urgent notice such that the removal and relocation of residents from the child residential facilities be completed in a safe, timely and orderly fashion.

Sincerely,

A handwritten signature in black ink that reads "Cathy A. Utz".

Cathy A. Utz
Deputy Secretary

Enclosure:
Order for Emergency Relocation

c: Christopher Spriggs, Assistant Executive Director
Raheemah Shamsid-Deen Hampton



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

ORDER

And now this 25th day of March 2019, pursuant to 55 Pa. Code § 20.37, the Commonwealth of Pennsylvania, Department of Human Services, hereby determines that the conditions existing at fourteen (14) licensed facilities located at:

Glen Mills Schools
185 Glen Mills Road
Glen Mills, PA 19342

as described in Attachment A, constitute gross incompetence, negligence and misconduct in operating a facility, including mistreatment and abuse of clients, likely to constitute immediate and serious danger to the life or health of the children in care.

Accordingly, it is hereby ordered that the residents be relocated from the child residential facility as promptly as can be safely accomplished.

Attachments:

Attachment A – Findings

A handwritten signature in cursive script that reads "Cathy A. Utz".

Cathy A. Utz
Deputy Secretary

FINDINGS**FACILITY AND LICENSE NUMBER:**

| | |
|--------------------------------|--------|
| BUCHANAN HALL I UPPER | 113050 |
| BUCHANAN HALL II LOWER | 113060 |
| CHESTER ARTHUR HALL | 136000 |
| HAYES HALL | 112880 |
| JACKSON POLK HALL | 112980 |
| JEFFERSON FILLMORE HALL | 112960 |
| JOHNSON HALL I | 112890 |
| JOHNSON HALL II | 113010 |
| LINCOLN HALL | 112920 |
| MADISON HALL | 112940 |
| MCKINLEY HALL | 137300 |
| TAYLOR HALL | 112860 |
| TYLER HALL | 113020 |
| VAN BUREN HALL | 113030 |

LEGAL ENTITY: Glen Mills Schools
185 Glen Mills Road
Glen Mills, PA 19342

The Department of Human Services (“department”), Southeast Region Office of Children, Youth and Families (“OCYF”) staff commenced an investigation in January 2019 at the above named licensed facilities of Glen Mills School (“Glen Mills”), located at 185 Glen Mills Road, Glen Mills, PA 19342. The investigation involves allegations of abuse sustained by children while under the care of Glen Mills staff.

Additionally, in June of 2018, the department's OCYF staff initiated a targeted site visit focused solely on conducting resident interviews in an effort to assess accusations that an underlying culture of abuse existed within the facility. This visit followed a series of anonymous written complaints alleging staff were mistreating and being aggressive with residents. One allegation claimed staff in one of the facilities cut residents' hair as a form of punishment. The interviews focused on the use of restraints by staff, the residents' relationships with staff, how residents are helped by staff to reach their goals and how safe residents feel at Glen Mills.

As a result of the ongoing investigations, OCYF representatives verified the following violations of the department's regulations for child residential and day treatment facilities, pursuant to 55 Pa. Code Chapter 3800:

- 3800.32(b), relating to Specific Rights. An investigation commencing on March 13, 2019 determined that a child was choked by staff, then he was pushed against a wall, causing his head to hit the wall.
- 3800.32(b), relating to Specific Rights. An investigation commencing on March 6, 2019 determined that staff failed to intervene to protect a child from another resident resulting in the child suffering a broken jaw.
- 3800.32(b), relating to Specific Rights. An investigation commencing on February 15, 2019 determined that a child was assaulted by a staff person causing an injury to his eye. The child was then coerced into saying that his injury was a result of playing basketball.
- 3800.32(b), relating to Specific Rights. An investigation commencing on March 13, 2019 determined that a child was choked by three staff and then slammed to the floor, causing the child to hurt his neck. The child expressed that he suffered migraines as a result of the incident.
- 3800.32(b), relating to Specific Rights. An investigation commencing on March 2, 2019 determined that a staff person punched a child in the chest for not listening to the staff person.
- 3800.32(b), relating to Specific Rights. An investigation commencing on February 22, 2019 determined that a staff person punched a child in the face, causing a laceration to his lip.
- 3800.32(b), relating to Specific Rights. An investigation commencing on February 22, 2019 determined that a child was punched by staff in the chest two to three times, and once in the forehead.

- 3800.32(c), relating to Specific Rights. An investigation commencing on March 13, 2019 determined that a child was choked by staff, then he was pushed against a wall, causing his head to hit the wall.
- 3800.32(c), relating to Specific Rights. An investigation commencing on February 15, 2019 determined that a child was assaulted by a staff person causing an injury to his eye. The child was then coerced into saying that his injury was a result of playing basketball.
- 3800.32(c), related to Specific Rights. A child disclosed on March 13, 2019 that he was asked to sign a document for court stating that he wished to remain at Glen Mills if he could not be sent home.
- 3800.32(c), relating to Specific Rights. An investigation commencing on March 13, 2019 determined that a child was choked by three staff and then slammed to the floor, causing the child to hurt his neck. The child expressed that he suffered migraines as a result of the incident.
- 3800.32(c), relating to Specific Rights. An investigation commencing on March 2, 2019 determined that a staff person punched a child in the chest for not listening to the staff person.
- 3800.32(c), relating to Specific Rights. An investigation commencing on February 22, 2019 determined that a staff person punched a child in the face, causing a laceration to his lip.
- 3800.32(c), relating to Specific Rights. An investigation commencing on February 22, 2019 determined that a child was punched by staff in the chest two to three times, and once in the forehead.
- 3800.32(k), relating to Specific Rights. An investigation commencing on March 13, 2019 determined that a child was choked by three staff and then slammed to the floor, causing the child to hurt his neck. The child expressed that he suffered migraines as a result of the incident.
- 3800.32(n), relating to Specific Rights. An investigation commencing on March 13, 2019 determined that a child was choked by staff, then he was pushed against a wall, causing his head to hit the wall.
- 3800.32(n), relating to Specific Rights. An investigation commencing on February 15, 2019 determined that a child was assaulted by a staff person causing an injury to his eye. The child was then coerced into saying that his injury was a result of playing basketball.

- 3800.32(n), relating to Specific Rights. An investigation commencing on March 13, 2019 determined that a child was choked by three staff and then slammed to the floor, causing the child to hurt his neck. The child expressed that he suffered migraines as a result of the incident.
- 3800.32(n), relating to Specific Rights. An investigation commencing on March 2, 2019 determined that a staff person punched a child in the chest for not listening to the staff person.
- 3800.32(n), relating to Specific Rights. An investigation commencing on February 22, 2019 determined that a staff person punched a child in the face, causing a laceration to his lip.
- 3800.32(n), relating to Specific Rights. An investigation commencing on February 22, 2019 determined that a child was punched by staff in the chest two to three times, and once in the forehead.

Based on interviews conducted with youth currently and formally placed at Glen Mills, the department determined that residents have been and continue to be subjected to physical harm as a result of being slapped, punched, and stricken by staff. In addition, youth are encouraged by staff to engage in physical altercations with peers that has resulted in injuries to youth and staff have failed to intervene in these altercations. Moreover, staff at Glen Mills have failed to seek necessary medical treatment for youth as a result of injuries sustained during altercations with both staff and their peers.

Glen Mills operates under a culture of intimidation as evidenced by a request that youth from Philadelphia County sign a facility developed document which was to be presented during an upcoming court hearing which stated that the youth wanted to remain at Glen Mills. Youth were informed that failure to sign the document would result in their court commitment starting over which would result in their remaining in placement for an extended period of time.

Information gathered during interviews of former and current youth placed at Glen Mills verifies that a culture of intimidation and coercion is pervasive at Glen Mills and that youth were told to lie about the care they received and the physical mistreatment they endured while placed at Glen Mills.

These findings verify that Glen Mills failed to protect the youth entrusted to its care, placed youth at risk of serious physical injury, permitted youth to sustain physical injuries by their acts and failure to act and Glen Mills engages in a culture that instills fear in youth through coercion and

intimidation. As a result, we find that youth placed at Glen Mills are at imminent risk and their safety is in jeopardy.

Aside from the aforementioned allegations, the department has determined there is a correlation between these allegations and previously issued violations against Glen Mills' facilities. This correlation demonstrates that abuse and mistreatment of children in care continues to date.

Between January 19, 2019 and March 4, 2019, a representative of the department conducted a complaint inspection at Glen Mills' Madison Hall. As a result of the complaint inspection, the department confirmed violation of 55 Pa. Code Chapter 3800:

- 3800.32(b), relating to Specific rights. During the course of a Child Protective Services ("CPS") investigation, the investigator determined that a physical altercation occurred resulting in injuries to the child's face. As a result, the child's rights were violated while under the care of Glen Mills.

On October 16, 2018, a representative of the department conducted a complaint inspection at Glen Mills' Hayes Hall. As a result of the complaint inspection, the department confirmed violation of 55 Pa. Code Chapter 3800:

- 3800.55(a), relating to Child Care Worker. During the course of a complaint investigation, it was determined that on October 9, 2018 during the 3:30 p.m. to 11:30 p.m. shift there were five child care workers on the unit with 49 students. On October 9, 2018 an incident occurred where at least one student entered another student's room and took money from the student. The incident occurred at approximately 8:00 p.m.

Additionally, between July 19, 2018 and September 12, 2018, a representative of the department conducted a complaint inspection at Glen Mills' Johnson Hall II where an incident of suspected child abuse occurred. As a result of the complaint inspection, the department confirmed the following violations of 55 Pa. Code Chapter 3800:

- 3800.1. During the course of a CPS investigation a failure to protect the health, safety and well-being of youth occurred while under Glen Mills' care. During the course of the investigation, it was determined that a youth in care was physically abused by the actions of Child Care Residential Staff on July 19, 2018. The alleged abuse occurred in multiple locations in Johnson Hall II. Further, the investigation revealed that several staff observed the incidents and failed to stop the mistreatment and abuse for an unreasonable period of time while in close proximity to the two separate incidents. Video surveillance of the

incident demonstrates that no action or physical threat by the youth occurred to precipitate the need for physical intervention. The investigation also found that all youth who were observing the abuse appeared to watch as if it was normal behavior in the facility as they appeared to sit emotionless.

- 3800.15(a), relating to Child Abuse. In the course of the investigation, it was determined that staff failed to report a separate incident of abuse against a youth in care at Glen Mills. The incident, in a separate location in the facility was not reported until days later even when Child Care Residential Staff in close proximity observed the incident. These staff are Mandated Reporters. The initial incident of alleged mistreatment which happened downstairs in the facility was the only incident originally reported, whereas the second incident was reported days later during video replay.
- 3800.32(b), relating to Specific Rights. In the course of the investigation, it was determined that the youth was found to be abused, mistreated, harassed, threatened, and subjected to corporal punishment by multiple Child Care Residential staff during the first and second incidents when he was slapped, slammed on the floor, and punched. Video surveillance shows other staff observing the incident, but failing to intervene to protect the child.
- 3800.32(c), relating to Specific Rights. In the course of the investigation, it was determined that the youth in the care of the Glen Mills was treated without any level of respect and dignity during the two separate incidents with staff.
- 3800.32(l), relating to Specific Rights. In the course of the investigation, it was determined that all youth who observed were denied their right to rehabilitation and treatment by observing some of the abusive behavior by Child Care Residential staff during the initial incident.
- 3800.32(n), relating to Specific Rights. In the course of the investigation, it was determined that the youth was subjected to harassment, unreasonable restraint, unusual and an extreme form of discipline by more than one Child Care Residential staff while other residents and staff observed.
- 3800.53(b), relating to Director. In the course of the investigation, it was determined that the Director, the person responsible for the administration and management of the facility failed to ensure the safety and protection of youth placed at the facility and ensure that staff adhered to policies and procedures in compliance with Chapter 3800.
- 3800.148(b), relating to Health and Behavioral Health Services. In the course of the investigation, it was determined that Glen Mills failed to provide or delayed providing the appropriate medical treatment of the child's injuries which were sustained at the hands of Glen Mills staff. After he was discharged from Glen Mills, the child required additional treatment when he reported having a head injury and back pain.

- 3800.202(a), relating to Appropriate Use of Restrictive Procedures. In the course of the investigation, it was determined that the staff used restrictive procedures in a punitive manner when the child was slammed to the floor and restrained.
- 3800.202(a), relating to Appropriate Use of Restrictive Procedures. In the course of the investigation, it was determined that the staff used restrictive procedures when there was no threat of the child injuring himself or others.
- 3800.202(c)(1), (2), relating to Appropriate Use of Restrictive Procedures. In the course of the investigation, it was determined that the staff failed to use any de-escalation technique or less intrusive technique as the child was speaking in a group setting and not acting out physically or aggressively.
- 3800.211(b), relating to Manual Restraints. In the course of the investigation, it was determined that the staff applied pressure to the child's airway, choking the child in a manner which restricted his breathing.

Further, on June 27, 2018, a representative of the department conducted a complaint inspection at Glen Mills' Hayes Hall. As a result of the complaint inspection, the department confirmed violations of 55 Pa. Code Chapter 3800:

- 3800.32(n), relating to Specific Rights. In the course of the investigation, it was determined that one staff member at Glen Mills (PM Senior Counselor) inappropriately gave 38 residents in Hayes Hall haircuts against their wishes after two students in Hayes Hall were absent without permission on Saturday June 23, 2018. Staff also removed the sofa cushions in Hayes Hall and forced the students to sit either on the ground or sofa without the cushions as punishment.
- 3800.33(b), relating to Prohibition Against Deprivation of Rights. In the course of the investigation, it was determined that 38 student's rights were used as a punishment in Hayes Hall. One staff member at Glen Mills gave 38 students haircuts because the students' peers were absent without permission. The investigators believe the haircuts occurred because the 38 students would not give information on the two students who were absent without permission. The haircuts were a form of punishment.

On June 8, 2017, a representative of the department conducted a complaint inspection as a result of suspected child abuse at Glen Mills' Tyler Hall Facility where a child received a broken jaw. As a result of the complaint inspection, the department confirmed violations of 55 Pa. Code Chapter 3800:

- 3800.15, relating to Child Abuse. In the course of the investigation, it was determined that two staff failed to report the allegations of abuse. After the investigation concluded, the

department obtained information that a senior staff person of Glen Mills was made aware of the incident on June 8, 2017 where upon Glen Mills staff asked for guidance on whether to file a report to ChildLine. The ChildLine Report was not made until the following day.

- 3800.32(b), relating to Specific Rights. In the course of the investigation, it was determined that the child sustained serious bodily injury that resulted from a physical assault by two staff. After the investigation concluded, the department obtained information that a senior staff person of Glen Mills was made aware of the incident on June 8, 2017 and advised staff to obtain ice for the child.
- 3800.32(c), relating to Specific Rights. In the course of the investigation it was revealed that the youth on the unit were required to sit on the floor in an uncomfortable position for over 60 minutes as punishment for wrongdoing.
- 3800.32(k), relating to Specific Rights. In the course of the investigation, it was determined that the child sustained serious bodily injury that resulted from a physical assault by two staff and that staff failed to seek immediate medical treatment. After the investigation concluded, the department obtained information that a senior staff person of Glen Mills was made aware of the incident on June 8, 2017 and advised staff to obtain ice for the child. It was learned the following day that the child suffered a broken jaw as a result of the incident when he finally was taken to medical staff.
- 3800.32(n), relating to Specific Rights. In the course of the investigation it was revealed that the youth on the unit were required to sit on the floor in an uncomfortable position for over 60 minutes as punishment for wrongdoing.

The ongoing failure to protect the safety of children, ongoing failure to immediately report suspected abuse, failure to provide proper medical attention and repeated pattern of violations described above constitute gross incompetence, negligence and misconduct in operating a facility, including mistreatment and abuse of children, likely to constitute immediate and serious danger to the life or health of the children in care pursuant to 55 Pa. Code § 20.37.

If you disagree with the department's decision, you have a right to appeal through a hearing before the Bureau of Hearings and Appeals, in accordance with 1 Pa. Code Part II, Chpt. 31 - 35 (General Rules of Administrative Practice and Procedure). Your appeal must indicate the reasons for the appeal, and you must be as specific as possible regarding your areas of disagreement with the department's decision. If you decide to appeal, a written request for an appeal must be received within ten (10) days of the date of the Order by:

Raheemah Shamsid-Deen Hampton
Southeast Regional Office of Children, Youth and Families
Pennsylvania Department of Human Services
801 Market Street, Suite 6112
Philadelphia, Pennsylvania 19107

This decision is final 11 days from the date of the Order, or if you decide to appeal, upon issuance of a decision by the Bureau of Hearings and Appeal.