

**OKLAHOMA COMMISSION ON CHILDREN AND YOUTH
OFFICE OF JUVENILE SYSTEM OVERSIGHT**

Name and Location of Facility: Ft. Reno Adolescent Center
El Reno, Oklahoma

Date of Visit: September 30 and October 1, 2009

Oversight Reviewer: Joanne L. Verity, Programs Manager

Focus of Visit: Unannounced Visit, 2009

Date: October 29, 2009

Introduction

The Office of Juvenile System Oversight (OJSO) conducted an unannounced visit on September 30 and October 1, 2009, at the Ft. Reno Adolescent Center, located at the Gary E. Miller Canadian County Children's Justice Center, in El Reno, Oklahoma. The purpose of the visit was to assess facility compliance with established responsibilities. The facility was certified as a coeducational, adolescent alcohol and drug treatment center that contracted with the Oklahoma Department of Mental Health and Substance Abuse Services (ODMHSAS). The Ft. Reno Adolescent Center was licensed as a Residential Treatment Facility by the Division of Oklahoma Child Care Services (OCCS) of the Oklahoma Department of Human Services (OKDHS) for twenty-four beds, and the center contracted with the OKDHS for substance abuse services. On the day of the OJSO visit, the census was twenty-two. The facility was accredited by the Commission on Accreditation of Rehabilitation Facilities (CARF).

Interviews Conducted

- Entry interview with the Gary E. Miller Canadian County Children's Justice Center facility director
- One youth guidance specialist and one youth guidance specialist supervisor
- Three residents
- Exit conference with the Gary E. Miller Canadian County Children's Justice Center facility director, director of behavioral health, and assistant director of behavioral health; Ft. Reno Adolescent Center Group Home program manager and two assistant group home program managers

Documents Reviewed

- Two personnel files
- Three resident files

- ODMHSAS Alcohol and Drug Treatment Program Certification Report dated March 22-23, 2007
- ODMHSAS Certification for Certified Substance Abuse program dated May 2007 – May 2010
- OKDHS OCCS License to operate a Residential Child Care Facility dated February 22, 2007
- OKDHS OCCS Residential Child Care Facility Visit Sheet and attachments dated July 30, 2009
- Grievance Tracking Log from June 1, 2009, through September 30, 2009
- Office of the Oklahoma State Fire Marshal report dated February 10, 2009
- Oklahoma State Department of Health Food Inspection report dated July 13, 2009
- ODMHSAS contract for treatment services FY2010
- Incident Reports from July 1, 2009, through September 30, 2009
- Facility Policy and Procedure Manual
- Staff Handbook dated July 2008
- Resident Handbook dated June 2009
- Behavior Report Log from August 1, 2009, through September 30, 2009
- Monthly recreation schedules for August and September 2009
- Menu for the week of the OJSO oversight visit

Findings

Treatment Team Meeting

The OJSO attended a portion of the regularly scheduled treatment team meeting. No issues were noted.

Facility Tour

The OJSO informally toured the Blue area and ate lunch with the residents. No issues were noted.

Resident Interviews

The OJSO interviewed three residents. The interview questions pertained to facility standards, program services, quality of life, and discipline practices. All residents interviewed said they had never seen mistreatment at the facility. The OJSO noted no concerns from the resident interviews.

Staff Interviews

The OJSO interviewed one youth guidance specialist and one youth guidance specialist supervisor. Staff indicated that they appreciated the regularity with which the facility held staff meetings. Staff requested training concerning “gangs” and adolescent substance abuse. While staff indicated a clear understanding of their responsibilities regarding the safety of the residents, they did not demonstrate a clear understanding of state law requirements regarding to whom to report suspected abuse or neglect. The OJSO noted no other concerns during the staff interviews.

Resident File Review

The OJSO reviewed three resident files. One resident file did not have the parent or guardian signature on a Treatment Plan Review that had been completed over a month prior. Two files did not have the parent or guardian signature on the Comprehensive Treatment Plan; one of those Comprehensive Treatment Plans had been completed over two months prior, and one had been completed a few weeks prior. In all three files reviewed, staff notations pertaining to the time of day were not clear and consistent in that not all staff indicated "a.m." or "p.m.", and some staff used military time, whereas some staff used standard time. Otherwise, the files were well organized and in order. The OJSO noted no other concerns from the resident files reviewed.

Personnel File Review

The OJSO reviewed the personnel files of one youth guidance specialist and one youth guidance specialist supervisor. The OJSO noted no concerns with the personnel files reviewed.

OKDHS Office of Child Care Services Inspection Report

The OJSO reviewed the OKDHS OCCS Facility Visit Sheet dated July 30, 2009. No areas of non-compliance were noted in the report. The OKDHS OCCS checklist for new policies effective July 1, 2009, indicated that the OKDHS Office of Client Advocacy (OCA) had approved the facility grievance procedures.

Grievance Tracking Log Review

The OJSO reviewed the resident grievances filed between June 1, 2009, and September 30, 2009. The OJSO noted:

- It appeared that sometime near July 1, 2009, the facility had changed the grievance form used by residents to file grievances. The OJSO noted that on the previous form, residents frequently signed their names agreeing to a resolution prior to the time that a resolution had been reached. The newer form appeared to have resolved this problem.
- The OJSO noted that the "proposed resolutions" developed by the local grievance coordinator (LGC) were sometimes generic.

The OJSO noted no additional concerns from the Grievance Tracking Log.

Incident Report Review

The OJSO reviewed the Incident Reports from July 1, 2009, through September 30, 2009. The OJSO noted:

- The regular practice at the facility was for one person to fill out the incident report, and for others who had knowledge of an incident to sign the form.
- Generally, the incident resolutions were acceptable and the reports were complete. One incident report dated August 30, 2009, had no resolution or supervisory staff signatures.

- There was no notation on the incident reports regarding whether or not the incident had been referred to the OKDHS OCA.

Facility Policy and Procedure Review

The OJSO reviewed the Facility Policy and Procedure Manual. The OJSO noted that the date of the last review by a governing board was not indicated in the manual. The OJSO also noted that Policy #300.20 did not reference new Oklahoma Statute provisions that became effective earlier in 2009.

Staff Handbook Review

The OJSO reviewed the Staff Handbook and noted that it was dated July 2008. The OJSO noted that the Staff Handbook did not address how staff were to report alleged abuse or neglect. The OJSO noted no additional concerns.

Resident Handbook Review

The OJSO reviewed the Resident Handbook dated June 2009. The facility programs manager indicated that the Resident Handbook was being revised and that attention would be given to the OCA grievance procedures as stated in Oklahoma Administrative Code 340:2-2-45. The programs manager said the handbook revision would be completed by the next OJSO oversight visit. The OJSO noted no other concerns.

Behavior Report Log Review

The OJSO reviewed the Behavior Report Log from August 1, 2009, through September 30, 2009. The OJSO noted that the facility had developed and adopted a new format for recording and documenting behavior reports. The new format was informative and appeared to encourage positive behavior. No concerns were noted from the Behavior Report Log.

The OJSO reviewed the most recent inspection reports by the fire marshal's office and the health department. Documentation indicated that all deficiencies cited by the fire marshal and the health department had been corrected prior to the OJSO visit.

Areas of Concern

1. The OJSO noted that the facility did not contract with the Oklahoma Office of Juvenile Affairs (OJA), yet the facility administration and staff acknowledged that, although infrequently, OJA custody youth had been residents of the facility in the past.
2. The OJSO noted that although the OKDHS OCCS had visited the facility on July 30, 2009, the posted License for the facility was dated February 22, 2007. The OJSO also noted that the posted License indicated that the facility was licensed to operate a "Residential".
3. The OJSO noted that although the OKDHS OCCS documentation for its visit on July 30, 2009, indicated that the facility grievance process had been approved by

the OKDHS OCA, the facility was unable to produce documentation indicating OCA approval.

4. One incident report dated August 30, 2009, had no resolution or supervisory signatures on the form.
5. The Facility Policy and Procedure Manual did not note the date of its last review by the governing board, and the manual did not reference newly enacted Oklahoma Statutory requirements for reporting alleged abuse and neglect. The OJSO noted that staff did not demonstrate a clear understanding of the state law requirements regarding whom to report suspected abuse or neglect.
6. The facility incident report form only allowed for one individual to describe what happened, and for others to sign the form. In addition, the form did not indicate whether the matter had been referred to the OKDHS OCA.
7. Two resident files reviewed did not have documentation regarding parental non-participation in the development of the resident's comprehensive treatment plan. One resident file reviewed did not have documentation regarding parental non-participation in the resident's service plan review.
8. The Staff Handbook was dated July 2008, and the handbook did not address how staff were to report alleged abuse and neglect.

Summary

On the days of the oversight visit, the facility administration and staff were accommodating and cooperative. The OJSO commended the facility regarding its newly developed and adopted format for recording and documenting behavior reports. During the exit conference, the OJSO discussed the findings and the areas of concern with the administrators and staff. The OJSO suggested that if the facility planned to provide residential services to OJA custody youth on a regular basis, the facility administration might consider a memorandum of understanding with OJA in order to clarify expectations for staff and residents. The OJSO also requested that the facility contact the OKDHS OCA to obtain appropriate approval documentation for its grievance procedures. The OJSO recommended that the facility revise its Facility Policy and Procedure Manual noting new Oklahoma Statute provisions, training staff in this regard, and noting the date of the review in the manual. The OJSO made several suggestions regarding the facility incident report form and the resident grievance form.