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February 10, 2016

To: Supervisor Hilda L Solis, Chair
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From: Philip L. Browning
Director

HUMAN SERVICES NETWORK dba YOUTH SERVICES NETWORK GROUP HOME QUALITY ASSURANCE REVIEW

The Department of Children and Family Services (DCFS) Out-of-Home Care Management Division (OHCMD) conducted a Quality Assurance Review (QAR) of Human Services Network dba Youth Services Network Group Home (the Group Home) in June 2015. The Group Home has three sites: one in the Third Supervisorial District and two in the Fifth Supervisorial District. The Group Home provides services to DCFS and Probation placed youth. According to the Group Home's program statement, its purpose is "First, to help children develop the skills and self-esteem which will enable them to become self-sufficient and productive persons in society. And second, to help develop and promote a viable social support system for children outside the foster care system."

The QAR looked at the status of the placed children's safety, permanency and well-being during the most recent 30 days and the Group Home's practices and services over the most recent 90 days. The Group Home scored at or above the minimum acceptable score in 8 of 9 focus areas: Permanency, Placement Stability, Visitation, Engagement, Service Needs, Assessment & Linkages, Teamwork, and Tracking & Adjustment. OHCMD noted opportunities for improved performance in the focus area of Safety.

The Group Home provided the attached approved Quality Improvement Plan addressing the recommendations noted in this report. In October 2015, OHCMD quality assurance reviewer met with the Group Home to discuss results of the QAR and to provide the Group Home with technical support to address methods for improvement in the area of Safety.

If you have any questions, your staff may contact me or Aldo Marin, Board Relations Manager, at (213) 351-5530.

PLB:EM:KR:rds

Attachments

c: Sachi A. Hamai, Chief Executive Officer
John Naimo, Auditor-Controller
Public Information Office
Audit Committee
Miriam Korn, Executive Director, Human Services Network dba Youth Services Network
Lajuannah Hills, Regional Manager, Community Care Licensing Division
Lenora Scott, Regional Manager, Community Care Licensing Division

HUMAN SERVICES NETWORK dba YOUTH SERVICES NETWORK GROUP HOME
QUALITY ASSURANCE REVIEW (QAR)
FISCAL YEAR 2014-2015

SCOPE OF REVIEW

The Out-of-Home Care Management Division (OHCMD) conducted a Quality Assurance Review (QAR) of Human Services Network dba Youth Services Network Group Home (the Group Home) in June 2015. The purpose of the QAR is to assess the Group Home's service delivery and to ensure that the Group Home is providing children with quality care and services in a safe environment, which includes physical care, social and emotional support, education and workforce readiness, and other services to protect and enhance their growth and development.

The QAR is an in-depth case review and interview process designed to assess how children and their families are benefiting from services received and how well the services are working. The QAR utilizes a six-point rating scale as a *yardstick* for measuring the situation observed in specific focus areas. The QAR assessed the following focus areas:

Status Indicators:

- Safety
- Permanency
- Placement Stability
- Visitation

Practice Indicators:

- Engagement
- Service Needs
- Assessment & Linkages
- Teamwork
- Tracking & Adjustment

For Status Indicators, the reviewer focuses on the child's functioning during the most recent 30 day period and for Practice Indicators, the reviewer focuses on the Group Home's service delivery during the most recent 90 day period.

For the purpose of this QAR, interviews were conducted with three focus children, three Department of Children and Family Services (DCFS) Children's Social Workers (CSWs), three Group Home staff, and the Group Home administrator.

At the time of the QAR, the placed children's average number of placements was four, their overall average length of placement was seven months and their average age was 15. The focus children were randomly selected. None of the focus children were included as part of the sample for the 2014-2015 Contract Compliance Review.

QAR SCORING

The Group Home received a score for each focus area based on information gathered from on-site visits, agency file reviews, DCFS court reports and updated case plans and interviews with the Group Home staff, DCFS CSWs, service providers, and the children. The minimum acceptable score is 6 in the area of Safety and 5 in all remaining areas.

Focus Area	Minimum Acceptable Score	GH QAR Score	GH QAR Rating
Safety - The degree to which the Group Home ensures that the child is free of abuse, neglect, and exploitation by others in his/her placement and other settings.	6	4	**Fair Safety Status** - The focus children are usually avoiding behaviors that cause harm to self, others, or the community but rarely may present a behavior that has low or mild risk of harm. The focus children may have had related history, diagnoses, or behavior presentations in the past, but may have presented risk behaviors at a declining or much reduced level over the past three months. The focus children have a minimally safe living arrangement with the present caregivers.
Permanency - The degree to which the child is living with caregivers, who are likely to remain in this role until the child reaches adulthood, or the child is in the process of returning home or transitioning to a permanent home and the child, the FFA staff, caregivers and CSW, supports the plan.	5	5	**Good Status -** The focus children have substantial permanence. The focus children live in a family setting that the child, the Group Home staff, caregivers, caseworker, and team members have confidence will endure lifelong.
Placement Stability - The degree to which the Group Home ensures that the child's daily living, learning, and work arrangements are stable and free from risk of disruptions and known risks are being managed to achieve stability and reduce the probability of future disruption.	5	5	**Good Stability** - The focus children have substantial stability in placement and school settings with only planned changes and no more than one disruption. The focus children have established positive relationships with primary caregivers, key adult supporters, and peers in those settings.

Focus Area	Minimum Acceptable Score	GH QAR Score	GH QAR Rating
Visitation - The degree to which the Group Home staff support important connections being maintained through appropriate visitation.	5	5	**Substantially Acceptable Maintenance of Visitation & Connections** - Generally effective family connections are being sought for all significant family/ Non-Related Extended Family Member (NREFM) through appropriate visits and other connecting strategies.
Engagement - The degree to which the Group Home staff working with the child, biological family, extended family and other team members for the purpose of building a genuine, trusting and collaborative working relationship with the ability to focus on the child's strengths and needs.	5	5	**Good Engagement Efforts -** To a strong degree, a rapport has been developed, such that the FFA staff, DCFS CSW, certified foster parent and the focus children feel heard and respected. Reports indicate that good, consistent, efforts are being used by the Group Home staff as necessary to find and engage the focus children, caregivers and other key people. Useful accommodations are used to provide scheduling times and locations based on convenience of appropriate parties. Engagement efforts are made frequently and on an ongoing basis.
Service Needs - The degree to which the Group Home staff involved with the child, work toward ensuring the child's needs are met and identified services are being implemented and supported and are specifically tailored to meet the child's unique needs.	5	5	**Good Supports and Services -** A good and substantial array of supports and services substantially matches intervention strategies identified in the case plan. The services are generally helping the focus children make progress toward planned outcomes.

Focus Area	Minimum Acceptable Score	GH QAR Score	GH QAR Rating
Assessment & Linkages - The degree to which the Group Home staff involved with the child and family understand the child's strengths, needs, preferences, and underlying issues and services are regularly assessed to ensure progress is being made toward case plan goals.	5	5	**Good Assessment and Understanding-** The focus children's functioning and support systems are generally understood. Information to understand the focus children's strengths, needs, and preferences is frequently updated.
Teamwork - The degree to which the "right people" for the child and family, have formed a working team that meets, talks, and makes plans together.	5	5	**Good Teamwork -** The team contains most of the important supporters and decision makers in the focus children's lives, including informal supporters. The team has formed a good dependable working system that meets, talks, and plans together; face-to-face family team meetings are held periodically and at critical points to develop plans.
Tracking & Adjustment - The degree, to which the Group Home staff who is involved with the child and family is carefully tracking the progress that the child is making, changing family circumstances, attainment of goals and planned outcomes.	5	5	**Good Tracking and Adjustment Process -** Intervention strategies, supports, and services being provided to the focus children are generally responsive to changing conditions. Frequent monitoring, tracking, and communication of the children's status and service results to the team are occurring. Generally successful adaptations are based on a basic knowledge of what things are working and not working for the focus children.

STATUS INDICATORS

(Measured over last 30 days)

What's Working Now (Score/Narrative of Strengths for Focus Area)

Permanency (5 Good Status)

Permanency Overview: The Group Home is providing the services that correspond with the focus children's permanency plans. The Group Home demonstrates efforts to reach the permanency plan requested by DCFS.

The first focus child is receiving family reunification services with his maternal grandmother. The focus child's concurrent plan is Permanent Planned Living Arrangement (PPLA). The focus child reported that the Group Home is assisting him in decreasing his anger in order for him to reunite with his maternal grandmother.

The second focus child is receiving family reunification services with his mother and his concurrent plan is legal guardianship with a relative. Although the focus child's permanency plan is family reunification, the focus child is aware that his mother is non-compliant with the case plan and court orders. The focus child reported that a more realistic permanency plan for him is to become independent and transition out of care. The focus child reported that his DCFS CSW would like him to transition to a lower level of care, such as a foster home; however, the focus child reported that he likes the Group Home so much that he does not want to leave.

The third focus child's permanency plan is PPLA. The focus child reported that the Group Home is assisting him in achieving his goals of acquiring transitional housing by providing transportation to interviews. The focus child graduated high school and was attending community college. The Group Home was also assisting him with securing financial aid for college.

The DCFS CSWs reported that they inform the Group Home of the focus children's permanency plans, in order for the Group Home to assist the focus children in achieving their permanency goals. The DCFS CSWs reported that they work with the Group Home case managers in ensuring the appropriate services are in place for the focus children to assist them in achieving their permanency goals.

The Group Home staff indicated that they support the focus children's permanency plans by facilitating family visitations, assisting the focus children with improving their behaviors, and providing information and resources for transitional housing programs to assist the focus children achieve their permanency goals of independence.

The Group Home administrator reported that they are fully supportive of the focus children's permanency plans. He added that the permanency plan for most of the children placed at the Group Home is PPLA. The Group Home administrator stated that they assist placed children with achieving their permanency plan of becoming independent by taking placed children to interviews for transitional housing, ensuring that they are on track to graduate high school and assisting them with getting into college.

Placement Stability (5 Good Stability)

Placement Stability Overview: The Group Home is providing good stability for the focus children. The focus children have established positive relationships with the Group Home staff. The Group Home staff socializes and interacts with the focus children daily. All three focus children reported that they get along with other placed children and staff at the Group Home. The focus children reported that staff is supportive. The focus children reported that the Group Home staff gives them space when they need it, but staff is available when the children need to talk or request staff assistance. They also shared that staff is kind and gives good advice. All three focus children reported that they would go to the Group Home staff if they had any concerns about their placement. The focus children reported that they like how the Group Home is operated. The focus children have developed relationships with the Group Home staff and with other children in the Group Home that are enduring.

The DCFS CSWs reported that they maintain contact with the Group Home staff and have meetings anytime issues arise to ensure that there are no placement disruptions. The DCFS CSWs reported that the Group Home staff is very good in contacting them when issues come up and reported that the focus children like being placed at the Group Home.

The Group Home staff reported that they provide support to the placed children to prevent placement disruptions. They also work with the Group Home therapist to address any behavioral concerns as they arise to stabilize placed children. The Group Home staff also reported that they hold treatment team meetings with the focus children to identify any concerns and behavior issues placed children may be experiencing in order to put an effective plan in place to avoid placement disruptions.

Visitation (5 Substantially Acceptable Maintenance of Visitation & Connections)

Visitation Overview: The Group Home provides good maintenance of visitation and family connections for the focus children. All three focus children have visitation either with family members or someone who is special to them. The Group Home assists the focus children with visitation by providing transportation and monitoring visitation when requested by DCFS.

The first focus child has unmonitored weekend visits with his maternal grandmother and siblings who reside with maternal grandmother. The Group Home transports the focus child to and from maternal grandmother's home. The focus child reported that he enjoys the visits.

The second focus child has monitored visits with his mother and siblings. The DCFS CSW for the focus child coordinates visits with the Group Home and the foster parents of the focus child's siblings. The Group Home facilitates the visits by providing transportation and monitoring the visits. The focus child reported that he enjoys his visits and that the staff at the Group Home encourages and reminds him to call his mother.

The third focus child has visitation with his Court Appointed Special Advocate (CASA) two times a week. The focus child reports being happy with his visitation, as he reported that his CASA is very supportive. The DCFS CSW for the focus child reported that the CASA is also the focus child's mentor. The focus child reported that he has a great relationship with his CASA.

All three focus children reported that the Group Home staff remind and encourage them to call their family members.

DCFS CSWs reported that the Group Home assists and facilitates the visits for the focus children and visits occur as requested by the DCFS CSW.

The Group Home facilitates visitations for the focus children by providing transportation and monitoring visits. The Group Home staff reported that for placed children that do not have family involvement, mentors are sought and/or the staff engage them in activities that they may enjoy. The Group Home staff stated that they strive to make the holidays special and provide extra support for placed children who may not have family involvement.

What's Not Working Now and Why (Score/Narrative of Opportunities for Improvement)

Safety (4 Fair Safety Status)

Safety Overview: The Group Home provides a minimally adequate to fair safety status for the focus children. The focus children reported feeling safe at all times while at the Group Home and always being supervised by staff. The focus children also reported that if they have been hurt by anyone at the Group Home, they can always go to the Group Home staff that will assist them.

DCFS CSWs reported that they do not have any safety concerns in regard to the Group Home or the safety of the focus children. The DCFS CSWs reported that the Group Home is good in collaborating with them when any safety-related issues arise.

The Group Home administrator reported that they ensure the safety of the focus children by having an open communication with the focus children and make sure that the focus children feel comfortable at the Group Home. The Group Home administrator reported that the focus children have his personal telephone number and are aware that they can contact him at any time with any concerns or issues they may have. The Group Home administrator reported that the Group Home staff attends trainings to ensure safety of placed focus children at all times.

The Group Home submitted a total of 29 SIRs during the past 30 days. The SIRs included incidents of: injury, runaway, substance abuse, psychiatric hospitalization, law enforcement involvement due to a placed child littering, assaultive behavior towards another resident and a placed child refusing to go to his scheduled doctor's appointment.

There were four SIRs involving two of the focus children. Three SIRs involved the first focus child; one incident involved the focus child accidently being hit with a basketball during a game and was non-responsive and had to be transported to the emergency room. The other two incidents, involved the focus child being AWOL, as he did not return to the Group Home after school at the expected time. There was one SIR involving the second focus child, related to substance abuse, as the focus child had returned from an off-grounds pass and was under the influence of marijuana.

Although the focus children and their DCFS CSWs reported no safety concerns, the Group Home fell below the minimum acceptable score in the area of Safety due to the Group Home not complying with

the procedures and protocols for reporting Special Incident Reports (SIRs). Further, not all SIRs were submitted timely or properly cross-reported to required parties. There was also a serious concern regarding the Group Home's failure to take appropriate action on an SIR where it was reported that the Group Home therapist noted that a placed child smelled of alcohol, was intoxicated, vomiting and passing out. The Group Home staff conducted a room check and found a bottle of alcohol half-empty. The Group Home did not ensure the placed child's safety and well-being by calling 9-1-1, as the placed child was refusing medical attention. Further, the SIR did not address measures taken by the Group Home to ensure there was no additional contraband in the Group Home. Concerns regarding supervision at the Group Home also arise, as there was no information regarding how the child had obtained the alcohol and brought it into the Group Home, or if the alcohol had been consumed at the Group Home.

The Out-of-Home Care Investigations Section (OHCIS) did not have any open referrals in the last 30 days.

PRACTICE INDICATORS

(Measured over last 90 days)

What's Working Now (Score/Narrative of Strengths for Focus Area)

Engagement (5 Good Engagement Efforts)

Engagement Overview: The Group Home makes consistent and good efforts to engage the focus children and key people in decisions that are being made for the focus children. The Group Home works to ensure that rapport has been developed among the Group Home staff, DCFS CSWs, family members, and the focus children. The Group Home also engages and keeps involved family members informed of the focus children's progress.

The focus children all reported having a rapport with Group Home staff and the Group Home administrator and they reported being heard and respected. Two of the focus children reported that they count on and seek out the Group Home therapist, house manager, or administrator. The third focus child reported that he is independent and does not like to count on anyone except for his CASA, who is very involved and supportive. He also shared that since he is an adult, he likes to try to do things on his own because he wants to become more independent as he transitions out of the Group Home.

DCFS CSWs reported having a good rapport and relationship with the Group Home case manager. The DCFS CSWs reported that they maintain regular monthly contact by telephone and they are informed of the focus children's progress. They may be invited to meetings, or they may have an opportunity to meet with the Group Home manager when they visit the focus children or when issues arise.

The Group Home staff reported that the Group Home case managers and/or house managers are the primary contact for the DCFS CSWs. They then relay the information to the Group Home staff and Group Home therapist and ensure that everyone is kept up to date in regard to the focus children.

Service Needs (5 Good Supports and Services)

Service Needs Overview: The Group Home provides a good array of services to the focus children. Intervention strategies identified in the case plan and Needs and Services Plan (NSP) match the services that are being provided for the focus children. The services put in place are helping the focus children make progress toward planned outcomes.

All three focus children are receiving weekly individual and group therapy. All three focus children attend weekly substance abuse meetings. They participate in Youth Development Services (YDS) on a monthly basis. The focus children also receive tutoring at school to enhance academic functioning, as needed.

In addition to the aforementioned services, the first focus child is receiving Therapeutic Behavioral Services (TBS) and also sees a psychiatrist monthly for medication management. The focus child has made positive progress in his behavior, such as being less defiant at the Group Home.

The second focus child shared that he is working on making improvements at school with his grades and following directions at the Group Home, as he acknowledged that he is defiant at times and does not always follow the Group Home rules.

The third focus child is benefitting from the services he is receiving. He has made progress since his placement at the Group Home. He is enrolled in college now and has obtained a part-time job.

The focus children reported that the services in place meet their needs. They reported that if they need anything, they know they can always count on and speak to the Group Home administrator who is always available for them and helps them in any way he can.

DCFS CSWs reported that the services in place meet the needs of the focus children and reported receiving the NSPs for the focus children.

The Group Home staff reported that they ensure all the appropriate services are in place for the focus children.

Assessment & Linkages (5 Good Assessments and Understanding)

Assessment & Linkages Overview: The Group Home has a good understanding of the focus children's functioning and support systems. The Group Home assesses the focus children's needs and provides intervention for them to function effectively in daily settings. The strengths, services, and supports are regularly assessed and modified to ensure progress is being made toward case plan goals. The DCFS CSWs reported that they have good communication with the Group Home case manager, who always keeps the DCFS CSWs updated on the focus children and their progress towards their goals as stated on the NSPs.

The focus children reported that they are part of the decision making in the activities they participate in. The Group Home ensures that the focus children participate in extracurricular activities of their choice. Two of the focus children are participating in martial arts classes, boxing, and yoga classes.

The third focus child participates in boxing classes and has obtained temporary employment through the YDS program he participates in.

The DCFS CSWs reported that the NSPs are very detailed as the Group Home has a good understanding of the focus children's needs. DCFS CSWs reported that the focus children can participate in extracurricular activities and the Group Home ensures that the focus children have a variety of choices for the children to choose from, or the focus children can decide on their own which activities they wish to participate in if the Group Home activity alternatives does not interest them.

The Group Home staff reported that they are hands-on with the focus children and work with them in getting to know their strengths and needs in order to best meet their needs. The Group Home administrator reported that the Group Home staff constantly remind the focus children of their treatment goals, as defined in their NSPs and provide bonus points to those who do achieve their goals, as the Group Home has a point system. The Group Home administrator stated that adjustments are made to the goals as needed to better accommodate the focus children and their specific needs.

Teamwork (5 Good Teamwork)

Teamwork Overview: The Group Home involves most of the important supporters and decision makers in the focus children's life, including informal supports. The team has formed a good working system that meets, talks, and/or plans together.

The Group Home is making good efforts in communicating with its staff and having regular internal meetings which include the Group Home therapist, house manager, and the home case manager. However, team meetings, which include all the team members, do not occur on a regular basis. The Group Home also informs involved family members of these meetings and family members have participated in team meetings. The focus children and DCFS CSWs reported that they were aware of who the team members are and reported participating in team meetings, but only when there are concerns or issues that may arise. The team could benefit from having frequent meetings to address the children's progress and strengths and with the inclusion of all the team members.

The first focus child reported being aware of his team members, which include the Group Home therapist, house manager, case manager, staff, and DCFS CSW. The focus child reported being part of meetings when problems may arise. The second focus child reported that he also participates in team meetings when he is not doing well or there are concerns to discuss. The third focus child reported that he participates in team meetings as well when there are issues that need to be addressed with the Group Home therapist, case manager and DCFS CSW.

The first DCFS CSW reported that she has only had a TBS intake team meeting at the Group Home and no other team meetings, as the focus child has been doing well. The second DCFS CSW reported that she has not had any team meetings at the Group Home; however, is working with the Group Home to schedule a meeting. The third DCFS CSW who has had the case for six months reported that she has participated in one team meeting per the Group Home's request. All three DCFS CSWs reported that they have not been invited to the NSP quarterly meetings by the Group Home.

The Group Home administrator reported that the focus children and the Group Home staff meet twice a week to discuss how things are going at the Group Home and to address any issues that may arise. The Group Home administrator also indicated that the Group Home case managers, therapist and staff meet with the focus children to discuss their progress and address their needs. The Group Home staff stated that they have treatment team meetings regularly with all staff present to discuss the status of placed children.

Tracking & Adjustment (5 Good Tracking and Adjustment Process)

Tracking & Adjustment Overview: The Group Home's intervention strategies, supports, and services provided generally reflect the focus children's needs. Regular monitoring and tracking of the focus children's status is communicated between the Group Home case manager and the DCFS CSWs. The Group Home case manger, DCFS CSWs, and Group Home administrator are aware of what is working and not working for the focus children. The DCFS CSWs have good understanding of what the focus children are in need of and communicate with the Group Home to ensure the focus children are receiving the appropriate resources and services. When the focus children are not receiving the services they need, interventions are modified to best meet their needs.

DCFS CSWs reported that implementation of services is being tracked by the Group Home through the NSPs, ongoing communication with the Group Home therapist and focus children. DCFS CSWs reported that the Group Home therapist informs them of the progress. DCFS CSWs reported that if the treatment goals do not appear to be sufficient, they would communicate with the Group Home therapist to modify the goals to best meet the needs of the focus children.

The focus children reported that things have been going well since they have been placed at the Group Home and there is nothing they would like to change.

The Group Home staff document daily behaviors and occurrences for each of the focus children in the Group Home's behavioral logs and the Group Home tracks the focus children's progress. Progress of the focus children is also communicated between the team members and through the NSPs. The Group Home staff reported that when the treatment goals do not appear to be sufficient, the Group Home case managers will modify the goals after discussing it with all team members. The Group Home administrator reported that the status of each focus child is reviewed weekly, bi-weekly, or on an as-needed basis to ensure that implementation of services are being tracked and communicated between team members.

NEXT STEPS TO SUSTAIN SUCCESS AND OVERCOME CURRENT CHALLENGES

In May 2015, OHCMD provided the Group Home with technical support related to findings indicated in the 2014-2015 Contract Compliance Review. Technical support and training provided to the Group Home related to timely NSPs, obtaining DCFS CSWs signatures timely, attainable goals for education, referring the children to Independent Living Program services, and ensuring new staff receive training regarding medical follow-ups.

In October 2015, the quality assurance reviewer met with the Group Home to discuss the results of the QAR and to provide the Group Home with technical support to address methods for improvement in the area of Safety. The Group Home submitted the attached Quality Improvement Plan (QIP). OHCMD quality assurance staff will continue to provide ongoing technical support, training and consultation to assist the Group Home in implementing their QIP.

Youth Services Network

10/28/2015

TO: Adelina Arutyunyan – DCFS-Out-of-Home Care Management Division

RE: Youth Services Network – Quality Improvement Plan

SAFETY OVERVIEW:

It was reported that there was no safety concerns reported by any child under the care of YSN, YSN staff and/or DCFS CSW. Group Home fell below score due to not submitting Special Incident Reports (SIR) in a timely manner, in detail and properly cross-reported to required parties.

1. Effective 10/28/2015, House Supervisors and ITrack On-Call Staff, under supervision of the Program Director, will assure that all SIRs are reported in a timely manner and no later than one business day from the time of incident; all SIRs will include detailed information of issues leading up to the incident, staff interventions and additional information added in addendums as necessary.
2. Effective 10/28/2015, House Supervisors and ITrack On-Call Staff, under supervision of the Program Director, will ensure that all SIRs will be properly cross-reported to all designated personnel following DCFS guidelines.
3. Effective 10/28/2015, if a resident appears to be under the influence of drugs and/or alcohol to the point where he is significantly ill or impaired and is refusing medical attention, YSN staff, under supervision of Program Director, will contact 911 immediately so a proper assessment can be completed to ensure the child's safety. Room searches will be conducted by staff 2x per week to ensure no contrabands in the facility and to ensure overall safety of the facility.
4. On 10/28/2015, all YSN staff were retrained on SIR policies and procedures by the Program Director to ensure all the above concerns are addressed.

Miriam Korn
Executive Director

10/28/15
Date

Cc: file

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