

**DEPARTMENT OF JUVENILE SERVICES
CORRECTIVE ACTION PLAN
IN RESPONSE TO WAXTER SPECIAL REPORT**

MAY 4, 2007

JJMU Recommendation

1. The Waxter Center physical facility has outlived its usefulness as a housing unit for children. The deficiencies of the physical plant threaten the safety of children and staff. It would be virtually impossible to improve the physical plant sufficiently to make it suitable for a secure detention program. We believe the children who are housed at Waxter should be relocated to an appropriate facility at the earliest possible date.

DJS Corrective Action Plan:

The Department is currently having an assessment completed to determine the most appropriate use of the Waxters facility. The assessment will be completed by Bray Associates beginning April 18, 2007 – April 19, 2007. Ms. Bray will assess all aspects of the current programming including the safety, health and welfare of all of the young women in the program. Staff and students will be interviewed and a complete report will be submitted to the administration that will articulate the areas strengths, weaknesses and specific recommendations for program development.

We anticipate receiving a tentative outline of the report on or before May 15, 2007.

At this time we are assessing other options for the placement of one of the programs into another facility.

JJMU Recommendation

2. A workable key system should be instituted immediately.
 - a. All facility keys should be color and/or texture coded to be easily identifiable in an emergency.
 - b. All locks should be opened easily with keys.
 - c. All staff members should be tested until they can rapidly identify emergency egress keys by touch.

If such a system cannot be instituted immediately, we recommend that all internal facility doors be unlocked at all times.

DJS Corrective Action Plan:

Locks have been ordered and plans are to have them installed on or before May 12, 2007. Tom Sherman, maintenance supervisor at Waxters is responsible for the completion of this project.

The new system will have keys and locks that are notched to make it easy for staff to identify which key will open which lock in the event of an emergency.

At the completion of the installation of the new lock system, all staff will be given a test to ensure the identification of the appropriate keys. This exam will be completed on all staff by the end of May, 2007.

JJUM Recommendation

3. The Waxter Center Superintendent should request that the State Fire Marshal perform fire safety inspections and drills on at least a monthly basis.

DJS Corrective Action Plan:

The Superintendent requested assistance from the Fire Marshall on March 15, 2007. They met March 23, 2007 to develop a plan of action for the safety inspections and fire drills to be completed monthly. Ms. Gardener was given verbal on the egress plan for Waxters. She is currently waiting for written approval.

The Fire Inspector for Anne Arundel County is Brett Wren and the contact person for DJS.

JJMU Recommendation

4. A viable behavior modification system should be developed for the population. Staff should be well-trained in that system and in other acceptable alternative behavior control systems to reduce the over-reliance on seclusion as a control mechanism.

DJS Corrective Action Plan:

Staff and youth have been trained in the Trauma Informed Care Model. We will wait for the recommendation of the consultant to determine the most appropriate model of programming to use for the detention population.

We will also be following up on the Trauma Informed Care Model with the instructor who provided the initial training with the staff and students.

JJMU Recommendation

5. Until staff members are trained adequately, seclusion should be prohibited in this facility. If a child becomes out of control, that child should be transferred to an appropriate medical facility.

DJS Corrective Action Plan:

The Department has scheduled a meeting with the JJM and DJS administration on April 30, 2007 to discuss the Seclusion Policy for Waxters. All modifications to the policy on how and when students are secluded will be determined at that time.

At the meeting on April 30, 2007, documentation was provided that only 5 girls had been in seclusion since March 20, 2007. The facility staff is using "time outs" for the girls and the "time outs" are working well.

JJMU Recommendation

6. The rated population of the facility should be determined in part by the number of staff available to supervise them. As long as Waxter suffers from chronic staff shortages, the rated population should be reduced to meet acceptable staff/youth ratios. These ratios must take into consideration the challenges presented by the architecture of the physical plant. The Center should not accept new residents beyond its rated population limit.

DJS Corrective Action Plan:

The daily rated population is 68. We are currently averaging a daily population of 40, which is below the rated capacity. We continue to recruit and hire staff to fill the vacant positions. We currently have five Resident Advisors in training. Once they complete the training, we will have close to the required numbers of staff. We will continue to recruit and hire staff to meet the required staff to student ratio. We anticipate having all positions filled by the end of the first quarter in the new fiscal year.

Human Resources and the Superintendent are responsible for staff recruitment.

JJMU Recommendation

7. The administration should consider bringing in trained mediators or other appropriate crisis management experts to address the ongoing and increasingly violent conflicts among the residents.

DJS Corrective Action Plan:

We do plan to continue to provide training for the staff though online training through the National Institute of Corrections (NIC), NJDA and refresher courses through the Department's training division. NJDA provided a series of Train the Trainer workshops. We can utilize those who were trained to provide the training to others with the support of the national trainers. Some of the topics they were trained in were:

Behavior Management, Conflict Resolution, Managing the Mentally Challenged Youth, Effective Communication and Behavior Observation and Recording.

Monday, April 30, 2007, the Mediation and Conflict Resolution Center at Howard Community College provided training in mediation and conflict to the students. This is now an ongoing relation and they will visit the facility once a month. The training focus is on; accepting conflict, awareness of feelings about conflict, active listening, analyzing conflict and several other topics.

**REQUEST FOR CLARIFICATION OF
PRELIMINARY CORRECTIVE ACTION PLAN
THOMAS J.S. WAXTER CHILDREN'S CENTER
SPECIAL REPORT (MARCH 22, 2007)
June 4, 2007**

Proposed Corrective Action Plan #1:

- A. As of May 25, 2007, the Monitor has not received the preliminary consultant's report. When will this report be forthcoming?

DJS Response:

The report was faxed to the Juvenile Justice Monitoring Unit on May 29, 2005.

- B. What is the Department's intent regarding the consultant's recommendations?

DJS Response:

DJS plans to develop an action plan in response to the consultants' report. The plan will involve the consultant providing training and follow up on her recommendations. Once the plan is finalized, the monitors will be informed of the time frame.

- C. What "other options" is the Department considering in regard to the "placement of one of the programs?"
- Which program will this decision affect?
 - How will this decision change the use of the physical plant at Waxter?
 - When will the Department finalize and implement this decision?

DJS Response:

DJS continues to explore the options available to them regarding the "placement of one of the programs" currently at Waxters. At this time we are not prepared to discuss or present a plan. We will inform the monitor when the plan is developed more fully.

Proposed Corrective Action Plan #2:

- A. Have the new locks been installed?

DJS Response:

The locks have not been installed as we have encountered unforeseen difficulty in securing the appropriate cylinders and locks. We still anticipate having the locks as soon as the company can deliver our complete order. The

locks were ordered April 6, 2007 with an anticipated delivery date of April 13, 2007. Purchase Order No: V00P7203203.

Final clarification was received June 1, 2007 that the locks will be delivered within five business days. Therefore we can anticipate that installation will occur on or before June 15, 2007.

- B. Have all staff members been trained to identify keys by touch? (Please provide documentation.)

DJS Response:

The training has not taken place because the locks are not in place. We will provide the dates of the training as soon as the training takes place.

Proposed Corrective Action Plan #3:

Please provide documentation for any fire safety inspections or drills that have been held since March 1, 2007.

DJS Response:

See attached fire drill reports.

Proposed Corrective Action Plan #4:

- A. Please provide a description of the Trauma Informed Care Model, including an explanation of the efficacy of this model as a behavior modification system.

DJS Response:

(See Attached information on Trauma Informed Care.)

- B. What is the recommendation of the consultant with regard to the implementation of a viable behavior modification system?

- C. On what date will a viable behavior modification system be fully implemented?

DJS Response:

The system of care that is being proposed will not take place until the dates for training have been confirmed with the consultants providing the training. Once the dates are confirmed the monitors will be informed.

Proposed Corrective Action Plan #5:

- A. By what date will all staff members have been trained in the current Department policy regarding the use of seclusion?

DJS Response:

The training dates have not been determined but all staff have been advised of the changes in how seclusion is to be used.

B. What modifications of policy on seclusion were determined at the April 30, 2007, meeting?

- Have these modifications been formally submitted as policy changes?

DJS Response:

The changes have not been submitted as policy.

- Have staff been trained in the administration of these modifications?

DJS Response:

The staff have been informed of the modifications.

Proposed Corrective Action Plan #6:

A. How is “rated” population determined?

- Does the calculation of the rated population take into account safety factors such as number of staff, classification of youth, and design of facility?

DJS Response:

The “rated” population is determined by the number of beds available and the number of staff available to provide the 1-6 staff to student ratio.

B. What is the current number of staff vacancies?

- What is the number of staff who are employed, but unavailable (due to leave, detail, etc.)?

DJS Response:

The total number of vacancies is seven.

- What is the total number of hours of overtime worked by staff since April 1, 2007?

DJS Response:

We are not clear on the dates of overtime you are requesting.

Proposed Corrective Action Plan #7:

Please provide documentation of trainings completed by Waxter staff since January 1, 2007 and dates for scheduled future trainings.

- Number of Waxter staff who have completed online training courses since January 1, 2007;

- Number of Waxter staff who have completed NJDA Train the Trainer workshops since January 1, 2007;
- Number of Waxter staff who have completed internal DJS (or internal Waxter) training programs;
- Subject matter of trainings;
- Date of trainings (or completion of online trainings).

DJS Response:

No staff have completed online training since January 1, 2007.

No staff have been involved in NJDA training since January 1, 2007

Subject matter of trainings since January 1, 2007 includes the following:

Number of staff completing training - 37

Substance Abuse Training: POSIT & SASSI Electronic 1/3/07

Adolescent Mental Health Developmental 2/2/07

Civility in the Workplace 2/9/07

Wellness & Nutrition: Diabetes 101 3/29/07 (7)

CPM Refresher 3/7/07 (7)

Wellness & Nutrition: My Pyramid – Personal Meal Planning 3/22/07 (6)

Entry Level Training 1/17/07 – 2/26/07 (2)

Entry Level Training 3/14/07 – 4/24/07 (3)

Wellness & Nutrition: Fast Food – Eating Healthy 3/15/07 (2)

Wellness & Nutrition: My Pyramid Personal Meal Planning 3/8/07 (5)