

**County of San Diego - Juvenile Justice Commission  
 2013 Inspection**

*According to Welfare and Institutions Code 229, the Juvenile Justice Commission conducts annual inspections of the juvenile detention facilities in San Diego County. It shall report the results of such inspections together with its recommendations based thereon, in writing, to the Juvenile Court and to the Board of State and Community Corrections.*

<b>Facility Name:</b>  <b>SAN PASQUAL ACADEMY</b>	
<b>Facility Address:</b>  17701 San Pasqual Valley Road Escondido, CA 92025-5301	<b>Date of Inspection:</b>  April 8, 2014
	<b>JJC Chair:</b> Kimberly Allan
	<b>JJC Admin. Officer:</b> Marc Regier
	<b>JJC Secretary:</b> Kathi Hamill
	<b>CWS Director:</b> Debra Zanders-Willis
<b>Presiding Judge of the Juvenile Court:</b>  Hon. Carolyn Caietti	
<b>Facility Administrator:</b> Tia Moore, Academy Director	<b>Telephone:</b> (760) 233-6005
<b>Facility Contact:</b> (if applicable)  Same as above	
<b>JJC Inspection Team:</b> Amy Lansing / Thomas Nelson	
<b>Staff and Representatives Interviewed / Met with in Person:</b> Tia Moore, San Pasqual Academy (SPA) Director Tim Farley, Assistant Executive Director, New Alternatives, Incorporated (NAI) Rex Sheridan, Mental Health Services Director, NAI Yvette Davis, Principal, SPA, San Diego County Office of Education (SDCOE) Dan Radojevic, CWDP, Youth Employment Coordinator, San Diego Workforce Partnership Johnny Ellison, SPA, Food Services Manager	
<b>Overview:</b>  San Pasqual Academy (SPA) is the first education campus for foster youth in the United States. SPA was opened in 2001 through a collaboration with New Alternatives, Inc. San Diego County Health and Human Services, San Diego County Office of Education, and San Diego County Workforce Partnership. SPA has a licensed capacity of 184, with a fluctuating census. SPA was not at capacity during the inspection.	

**General Comments from the Inspection Team:**

SPA continues to be a model facility delivering essentially full service, wrap-around services in a residential setting to foster youth, with an eye to providing *integrated living skills* (social, occupational/vocational, academic), trauma-informed care and an embedded residential education program to residents. A 10-Year Evaluation report based on data from alumni strongly suggest safety, permanency (significant relationships with adults) and well-being in health, education and employment are predicted by engagement in SPA programming and length of SPA stay.

Many questions have arisen, however, about the San Diego County Office of Education (SDCOE) run school on site at SPA as well as the inter-agency interactions with San Pasqual Union School District, including, but not limited to, concerns raised by the Dependency Legal Group (DLG) – who holds the State of California contract to provide lawyers for the parents and youth involved in the Child Welfare System, a Federal Program Monitoring audit (06/24-27/2013), a Grand Jury inspection and the District Contract holder (Vista Hill) for provision of supplemental Mental Health Services during the inspection period. There have also been three different Principals in the last two years which impact the continuity of information flow related to the concerns raised and information provided to various agencies and inspection teams has been discrepant. To that end, we have attempted to highlight the main areas of concern along with specific recommendations for each area. The goal of these recommendations is to bring together the various agencies and groups involved in direct service provision, oversight, and inspections in an effort to improve transparency and communication among all parties involved in caring for dependent youth at SPA.

**The 2013-2014 Juvenile Justice Commission recommends to New Alternatives, Inc., Health and Human Service Agency (HHS), San Pasqual Union School District, Juvenile Court and Community Schools (JCCS), and the San Diego County Office of Education (SDCOE):**

1. Overall, the JJC recommends that all agencies involved in services for SPA residents establish *much greater* transparency, better communication, and efficiency in providing consistent and accurate information among partners as well as to inspection teams and other affiliated agencies on issues related to the coordinated care of SPA youth (mental health and education services).
2. While understandable, the multi-agency involvement with SPA residents can serve to cloud responsibility and accountability. Many individuals, groups and agencies may be advocating for these vulnerable youth but the current tensions among the parties involved with SPA residents does not serve the best interest of these youth.
3. All relevant inspection teams should routinely be provided with documentation related to any “SPA” school related action plans, inspection issues, and performance improvement plans that involve SPA residents. These data points must be provided by SDCOE and JCCS to inspection teams, and if not already done routinely, school related inspection reports, PIPs and action plans should be provided to New Alternatives.

**The 2013-2014 Juvenile Justice Commission recommends to San Diego County Office of Education and JCCS:**

2. In terms of issues raised about the residential school at SPA:
  - 2a. A Performance Improvement Plan (PIP) was reportedly in effect with the State of California for approximately three years due to SPA’s underperformance on the California High School Exit Examination (CAHSEE) test scores for at least two years prior to the initiation of the PIP. It is currently unclear if a PIP is still in place, if the goals of that PIP were met, or if the PIP was simply removed due to SPA’s no longer accepting federal funds (e.g., Title 1).

*It is disconcerting that the current SDCOE Principal at SPA was unable to provide details about the Federal Audit or any related PIP and that New Alternatives representatives were unaware of the situation. This emphasizes the need for better communication between SDCOE/JCCS and the residential SPA school, regardless of turn-over in principals. Miscommunication could also be reduced if New Alternatives was regularly apprised of the SDCOE-run SPA school’s progress in addressing issues of underperformance and alignment with Federal Standards. The Juvenile Justice Commission (JJC) acknowledges that Principal Davis is relatively new to SPA and that*

*perhaps the confusion is related to the Action Plan set in place between JCCS and the SPA advisory board to address issues related to academic proficiency. While it is not clear what the PIP entailed, and the official Action Plan was not provided to the JJC, the following information was provided by Principal Davis with regards to improving academic performance among SPA students:*

- 1) Two resource teachers were hired to support classroom instruction. The Math resource teacher began March 1, 2014 and ELA resource teacher began on April 7, 2014.
- 2) Students that scored below grade level in reading on the Measure of Academic Progress (MAP) taken during the fall were scheduled for an extended day class that focuses on reading improvement and assistance in current English classes.
- 3) Teachers work with after school tutors - specifically hired by New Alternatives to supplement educational resources - to implement a plan to target students that need additional assistance in core subjects.
- 4) A class was incorporated into the master schedule to support underperforming students in math.

*The JJC was independently able to obtain a copy of the Federal Inspection audit through the DLG since the onsite SPA school never provided one after several requests.*

No details were provided by the SDCOE run on-site SPA school with regards to their response to the Federal Audit indicating failure of compliance with regards to School Parent Involvement Policy (I-CE 02, CE 2.3); School Site Counsel Composition (II-CE 07); the Single Plan Student Achievement (SPSA) revision to account for all Title 1 Part A and EIA-SCE funds allocated to the school in CARS and alignment of the expenditure of these funds with SPSA goals, actions and strategies; SES Parent Selection of state-approved providers (II-CE 13) and LEA-Provider Contract Monitoring (II-CE 14); Local Education Agencies (LEA) use of Title 1 for Language Instruction (II-CE-16), website documentation (II-CE-17) and fund distribution (III-CE 18); proof of service supplement rather than supplant with Title I, Part A and EIA/SCE funds as well as correction of administrative charges (III-CE 19 and 20); School Accountability Report Card posting (IV-CE 26); Evaluation of the Compensatory Education Program report and documentation (IV-CE 28); documentation of paraprofessionals' qualifications (V-CE 30); school resource allocations for professional development for staff and parents (V-CE-31); **adequate documentation of procedures to ensure equitable access to, and receipt of, appropriate SES accommodations and assistance for Students With Disabilities (SWD) and limited English proficiency** (VI-CE 35); other fiscal monitoring and allowable costs (III-FM 02) as well as Supplement, not Supplant issues (III-FM 03) related to Title 1 Part A (3010), Title II, Part A (4035), Title III (4203), Title IV, Part B (4124); and documentation to support expenditures of Title IV, 21<sup>st</sup> Century funds (III-FM 06).

***The JJC notes that details about overall LEA compliance with Federal standards and response to audits should be provided directly from JCCS and SDCOE, and that information about compliance should be routinely made available by JCCS/SDCOE during all inspections that include Juvenile Court and Community Schools. If the lack of compliance was "resolved" only by no longer accepting funds such as Title 1, some explanation is needed with regards to the impact on students' education and availability of services. If the SPA school continues to be out of compliance, that should also be made transparent.***

**Overall, given the issues raised by various entities in relation to the SPA school, if feasible it would be productive to have an onsite Professional Learning Communities program to supplement the regular teacher consultations conducted on Fridays.**

2b) SDCOE/SPA's school has not met the University of California (UC) A-G requirements. It is the position of the SDCOE Principal Davis and New Alternatives representatives that these requirements have always been met (i.e., SDCOE adhered to the textbook/curriculum adoption protocols set forth by the California Department of Education and the associated applicable Education Code). However, the appropriate paperwork was never filed. As the deadline was missed last year, SPA will be eligible to apply for UC approval in September 2014.

**An inspection of the entire curriculum was not conducted by the JJC, but we understand the need for UC approval regardless of how well a curriculum adheres to the A-G principals. We further underscore the urgency for this approval as "SPA" is held up as a model for providing gold standard services to foster youth and is viewed as a college preparatory program. As such, diligence with regards to obtaining appropriate approvals and credentialing is critical. It is the understanding of the commission that the responsibility for filing the A-G paperwork was the responsibility of the SDCOE, with only input from the SPA Principal regarding the curriculum. It is not clear why SDCOE did not complete this paperwork many years prior.**

2c) Availability of AP coursework to facilitate A-G requirements, limited academic summer program and onsite library access. In 2013, it was reported to the JJC that SDCOE had purchased a full continuum of online courses through Compass Learning and that these courses would allow students to complete necessary requirements for direct enrollment in the UC system. The DLG reported in July 2013 that SPA specifically had Advanced Placement courses directly available to youth at SPA. During our inspection, however, Principal Davis stated that students enrolled at SPA may be dual enrolled at a community college (examples included Palomar and Grossmont Community College) which offers classes that are not available at SPA or additional classes needed that do not fit into the student's regular school day schedule. However, these are not AP classes and students that are eligible and request AP classes would need to elect to enroll in the local high school.

It is likely that the demand for AP coursework is not high, as it was reported during the inspection that SPA students are performing, on average, at the 5<sup>th</sup> to 6<sup>th</sup> grade level academically. However, a significant impact on the continuity of academic opportunities is likely when there is a combination of scheduling issues for A-G coursework (not all classes available throughout the year, student scheduling conflicts), AP coursework is not available onsite and the SPA library is essentially closed. Of note, plans were in place to move the library contents to the computer/technical center, and we encourage this plan so that both electronic and original source materials are available to residents in a central, monitored, location.

*Given that it is extremely rare for high school level SPA residents to attend school off campus, it seems that onsite online availability of AP courses, as well as other A-G coursework, would off-set scheduling problems related to regular onsite SPA course availability which likely interfere with academic progress. These measures should be taken to reduce additional student burden of dual enrollment, commute time etc. Further, gaps in education could be offset by a move to year round classes as supported by the 2013-2014 San Diego Grand Jury investigation of detention centers and other special purpose community schools serving at-risk youth (access to 'The Education & Rehabilitation of At-Risk Juveniles: An Opportunity for Positive Change' is available through the following link:*

<http://www.eastcountymagazine.org/sites/eastcountymagazine.org/files/2014/May/The%20Education%20and%20Rehabilitation%20of%20At-Risk%20Juveniles-1.pdf>

2d) Individualized Education Plan (IEP).

In general, with regards to IEPs and Special Education Services, the JJC believes that because foster youth are frequently moved between schools and school districts, they are particularly vulnerable to falling through the cracks when it comes to early identification of learning or other disabilities. In the 2012-2013 calendar year, only three (3) students were SPA identified with IEPs (special needs), for a total of twenty-two students on IEP. In the 2013-2014 calendar year, again only three (3) students were SPA identified with IEPs, for a total of eighteen (18) students with IEPs. Based upon the low number of children identified as having special needs by SPA, it may be that they assume that students who need IEPs are typically already identified before they get to SPA. Therefore, additional efforts are strongly warranted to identify youth with disabilities. Because of their frequent transitions, the assumption that most IDEA eligible youth are identified in elementary school are inaccurate for foster youth. SPA rarely identifies youth for IEP screening (averaging 2-3 youth per year over the last several years) and yet this is especially critical for success at SPA as well as movement from high school to college.

The SPA school has small group instruction, so many youth who might otherwise be referred for a special education evaluation (or might be on an IEP) are not so referred, even if a disability is suspected. *While this small group instruction may be a strength of SPA, it may not be enough to meet all of the disabled child's needs and may also set a youth up to fail upon entrance to college.* Any time that a youth is suspected of having a disability and who needs some form of specialized instruction, a referral should be made irrespective of whether SPA's small group instruction may help the youth. This is especially important if the youth changes schools, or if they graduate from high school and move on to college. If a youth transfers out of SPA, other schools may not have the same small classroom size, and without a potentially needed IEP, the youth could be lost. ***Further, the youth has the potential for accommodations under a 504 plan in college if they graduate high school with an active IEP.***

***The JJC recognizes that it may be too burdensome to offer a full range of services so that a youth who is otherwise appropriate for the program does not have to change placements. Therefore, if the SPA on site school does not have the amount or type of services that a youth with an IEP needs for an educational benefit, they should make strong efforts to refer to either the local district serving SPA residents (i.e., Escondido Union High School District) or back to their home district for a change of placement.***

2e) SPA reported graduation rates are significantly discrepant from those noted by the State of California. SPA reports 92% graduation rates while the State reports rates closer to 28%. While some discrepancies may be related to whether or not graduate equivalency diplomas (GED) are classified as "graduation" (SPA includes GEDs in their calculations), it seems that the primary discrepancy lies in how standard graduation itself is calculated.

SPA reports **any** successful graduation from High School, regardless of the youth's age or initial date of high school enrollment. In contrast, the State appears to calculate graduation based on the number of students who earned a high school diploma or passed the California High School Proficiency Exam within four years from their enrollment in high school relative to the number of first-time 9<sup>th</sup> graders in the fall four years prior, plus students who transfer in, minus students who transfer out, emigrate, or die during the four school years prior to graduation.

***Given the significant mobility of foster youth that translates into movement between various school systems, delays in transfer of credits, redundancy of class time to make up for partial credits and established differences in academic performance because of these discontinuities and disruptions, a strict four-year graduation rule from initial date of 9<sup>th</sup> grade enrollment, such as used by the State, is very misleading. Reporting graduation rates***

**in both forms (strict four years from initial enrollment versus any graduation) provides transparency and also highlights what is possible for foster youth who are given adequate time to complete their degrees as well as the type of support available in a residential academic environment such as SPA.**

**Further, while the inter-agency goals should be to elevate foster youths' academic performance to the level of their non-foster care peers, it is still more accurate – and less misleading - for academic performances to be compared between SPA youth and foster youth serviced in non-SPA high schools relative to non-foster youth peers. This is simply the only way to fairly evaluate the educational impact of on-site residential education programming at SPA and it is our hope that Juvenile Court and Community Schools (JCCS) and SDCOE will do this in the future. We hope that the costs associated with education at SPA will not result in disbandment of the onsite programming. SPA is among the most successful academic settings under the JCCS umbrella and when combined with internships and work readiness programming may be the best hope for high-risk youth – both on the child welfare and juvenile delinquency side.**

2f) Discrepancies in reports of Teacher Certifications. SDCOE and DLG noted that only two of eight teachers on the SPA campus were certified to teach the courses they were teaching but the teachers were reassigned to teach the correct courses in the fall of 2013. SPA Principal Davis and New Alternatives representatives firmly state that was not the case, and their teachers have always been appropriately credentialed.

***JJC is unable to resolve these discrepancies based on information available at the time of this report but they may be related to distinctions between 'qualified' and 'highly qualified' based on the State of California definitions.***

**The 2013-2014 Juvenile Justice Commission recommends to San Pasqual Union School District, HHSa and New Alternatives:**

3) Supplemental Mental Health Service Issues at San Pasqual Union School District.

It has come to the attention of the JJC that Vista Hill, LAC was contracted – at least during a portion of the inspection review period - by the district to provide supplemental mental health services to SPA residents who attended the middle school at San Pasqual Union. However, after contacting HHSa directly to request consent, Staff at Vista Hill have been unable to provide mental health services to identified students in the offsite middle school run by San Pasqual Union. While HHSa was supposed to consult with the appropriate lawyers to obtain consent, Vista Hill never received any follow-up communication. It is not clear at this time if students' lawyers are impeding access to the youth for further evaluation and services, if HHSa social workers have not been forthcoming with education related counseling information which impedes appropriate treatment, if additional pertinent information is needed from New Alternatives or if a combination of factors are at play.

Judge Caietti previously issued a blanket order allowing communication among all treatment providers for Dependent youth, and thus no barriers should exist for a reasonable flow of information to provide much needed support and treatment to youth serviced at SPA, particularly when behavioral issues impact academic achievement and funds are available to provide additional support. That said, the judicial order does not necessarily apply to schools and providing services to youth in an educational setting may fall outside of the parameters of the order. If HHSa has a concern that confidential information was requested that may not be directly related to education service needs, that concern should be discussed in a meeting with all concerned parties (HHSa, Vista Hill – or any contracted provider of mental health, IEP or ERMHS services, San

Pasqual Union, New Alternatives). The JJC is specifically concerned that San Pasqual Union has been unable to obtain appropriate mental health support for students and has chosen instead to call for police intervention at their school as a means of managing the behavior of SPA residents receiving their education off-site. San Pasqual Union would benefit from training in Trauma Informed Care, as trauma and mental health issues are certainly not exclusively limited to their pupils who come from San Pasqual Academy. Police intervention does not further educational or mental health goals. If San Pasqual Union has already obtained TIC training, then additional support and training for their administrative staff and teachers are clearly necessary for the benefit of all students at their school.

***The JJC strongly recommends that San Pasqual Union, HHSA social workers, and New Alternatives make every coordinated effort to facilitate the provision of services to qualified students by SDCOE contractors. All agencies involved in the delivery of services to SPA residents should facilitate transparent, non-territorial inter-agency collaborations. Every effort should be made to be transparent and to provide relevant and appropriate information in a timely manner. This requires various entities and organizations to work together, irrespective of potentially competing interests or agendas and to truly represent the best interests of these vulnerable, dependent youth. San Pasqual Union must also be aware that calling for police intervention should absolutely be a last resort as it only escalates conflicts and is not an effective method of improving behavior or delivering education related services.***

**The 2013-2014 Juvenile Justice Commission recommends to New Alternatives, Inc.:**

4. SPA responded to the JJC recommendation from 2011-12 to provide for better tracking of self-harm incidents, assaults and grievances, which allow SPA staff and inspection committees to review grievances and incidents in a systematic way. While the SPA created a form to record grievances, the SPA response(s) to and/or action(s) taken to resolve grievances, are still not systematically recorded. We recommend that: 1) the grievance form specifically include a designated section to denote how the grievance or complaint was resolved; and 2) that self-harm incident and assault reports be routinely provided during inspections. We fully recognize that Child Welfare environments differ from custodial incarceration placements and that most grievances at SPA are more personal (and unrelated to punitive or restrictive measures) in nature, but some record of conflict resolution and/or general outcomes are warranted.
5. The JJC continues to recommend more staff training, as well as resident services and psychoeducation with regards to the precursors of addiction in youth so that residents are better informed about the consequences of addiction, as well as the interrelationship between trauma exposure and substance use/abuse.
6. Consistent with our prior recommendations and those of the Grand Jury, we encourage the inclusion of appropriate youth from the delinquency side of the Juvenile Court where possible. We do not recommend the involvement of the San Diego Probation Department in the selection of SPA students and understand the challenges as SPA is relatively remote and parents/guardians, as well as youth who successfully complete Probation, would need to be willing for their child to reside at SPA. However, there are a number of youth who may be academically motivated, eligible for enrollment at SPA upon completion of the Probation commitments and would benefit from a more consistent environment that helps the youth disengage from delinquent peers in their home community. We concur with the Grand Jury that after successful completion of Probation supervision, the Juvenile Court and HHSA could process referrals to SPA for possible admission.

**The 2013-2014 Juvenile Justice Commission recommends to appropriate legislative action be taken with respect to the following issue:**

## 7. Congregate Care Status.

The move away from congregate care has been based in part on the inadequately regulated growth in residential care in the past. However, institutions such as SPA are highly regulated and provide an extension of home long after a youth turns 18. The Commission recommends that legislative action be taken to classify institutions like SPA as a hybrid so that the placement of youth at SPA and the use of services there can be maximized for appropriate youth.

### **Commendations:**

1. SPA's dedication to providing a home like environment for foster youth, which extends to all aspects of their life (personal growth, healthy development, school, work readiness, life skills, health care etc.) is exceptional. Further, the extension of this "touchstone" for young adults to come back to at any time, just as they might a biological family, should be recognized as outstanding. This home environment is further facilitated by the foster grandparent program that provides opportunities for "grandparents" to live on campus for reduced rent while mentoring youth and sharing their life experiences.
2. The job-readiness program run by the San Diego Workforce Partnership at SPA is state of the art and has a very dedicated staff that provided hands-on classes including the Youth Empowerment Services program. Among the programs available are computer skills, college application preparation, video production and financial literacy. Additional opportunities are available onsite to learn organic gardening, farmer's market skills, working at the student-run coffee shop, and culinary skills. In conjunction with the extracurricular activities on campus (including football and basketball teams), these services truly make SPA a model facility.
3. Overall there are broad opportunities for staff training and development and these trainings are extended to school personnel. This clearly translates into strong relationships and bonds between staff and youth in residence.
4. The embedded mental health services, as well as health clinic, model at SPA is commendable. This permits addressing issues as they arise in a manner more comparable to a healthy familial response.

### **Serious Incidents During the Calendar Years:**

#### 2012:

Number of suicides:   0    
Number of attempted suicides:   0    
Number of deaths from other causes:   0    
Number of youth absence without leave (AWOL):   9    
Number of attempted AWOL:  20 

#### 2013:

Number of suicides:   0    
Number of attempted suicides:   0    
Number of deaths from other causes:   0    
Number of youth absence without leave (AWOL):   2    
Number of attempted AWOL:   8  

### **Other Inspections (please list most recent inspections and dates):**

Community Care Licensing:   April 28, 2011



Fire Marshal: October 24<sup>th</sup>, 2011

Department of Environmental Health: October 20, 2012

Date of Last Fire Drill: December 7, 2013

**Problems/Complaints Affecting Facility During the Calendar Year:**

2012:

Court Orders Affecting Facility (*please have available, if applicable*):  Yes  No

Pending Litigation:  Yes  No

Number of Written Complaints / Grievances Involving:

- Residents: 0
- Attorneys: 0
- Family Members: 0
- Medical: 0
- Abuse: 0

2013:

Court Orders Affecting Facility (*please have available, if applicable*):  Yes  No

Pending Litigation:  Yes  No

Number of Written Complaints / Grievances Involving:

- Residents: 13
- Attorneys: 0
- Family Members: 0
- Medical: 0
- Abuse: 0

**FACILITY BACKGROUND**

The Academy's residential program was designed for both male and female students between the ages of 12 and 18 who are in the dependency system. Academy youth are referred through the San Diego Health and Human Services Agency. The Academy was designed to offer youth a permanent and stable placement where they can pursue academic and vocational goals, establish trusting and healthy relationships with peers and adults in a community setting, participate in a variety of extracurricular activities, acquire essential independent living skills, address emotional and behavioral challenges stemming from trauma related experiences, and receive necessary support through their transition to adulthood.

**Resident/Staff Composition and Communication:**

Over the last several years, SPA workforce diversity was approximately: 52.2% White; 14.4% African-American; 14.4% Hispanic; 5.5% Asian; 11.4% Middle Eastern; .9% African; 5% Native American and .5% Pacific Islander. The ethnic diversity of residents was 22.2% White; 28.8% African-American; 40.7% Hispanic; 1.4% Native American; .7 Caribbean; 4.4% Asian and 14% African.

Most residents speak English, with some Spanish speakers. English- and Spanish-speaking staff are available, as well as some staff speaking Tagalong and French. Staff are trained in Cultural Competency.

**General Facility Condition:**

The exterior and interior of SPA appeared to be in very good condition. Lighting was adequate, although no evening inspection was done. The outdoor condition of the facility was clean, neat, bright, and safe. There are

several outdoor and indoor recreational areas with modern equipment. Efforts have been made to decorate the houses and outdoor areas in a non-institutional manner.

**Housing/Sleeping Accommodations:**

Student housing currently consists of 11 female houses and 10 male houses with 6 – 8 students residing in each house. Students do share a room with one roommate; however, the room is separated by a privacy wall that also functions as a closet on both sides. Roommates share bathroom facilities with two other roommates on the other side of the bathroom, making a quad (much like a college dormitory arrangement). All houses have a large family room/kitchen area where meals are prepared and served, group and house activities are facilitated, and where community interactions take place. Each house is adjoined with a house parent apartment, with most houses having house parents who live in this unit and provide supervision, staffing, and support during the after school hours.

Youth are assigned to a particular house based on many factors which most often include age, risk factors, “goodness of fit” with house parents or lead staff, hobbies and interests, the resident’s level of structure needed, etc. After the youth is assigned, there is also flexibility if the program or the youth feels that another house is more appropriate or better suited for the resident.

**Storage:**

Cleaning products are maintained by the House Parent or SPA staff in the locked under-sink cabinet, located in each residential unit. The kitchen and laundry area maintain cleaning supplies as appropriate for the needs of the area, and these areas are not accessible to residents. The kitchen knives are maintained in the kitchen area behind locked doors, which are not accessible to residents. SPA does not have any weapons.

**ADMINISTRATION / MANAGEMENT**

**Admission and Orientation:**

- Are minors oriented to rules and procedures?  Yes  No
- Are minors given copies of rules and procedures?  Yes  No
- Can minors request that rules and procedures be provided in a language other than English?  Yes  No
- Can parents request that rules and procedures be provided in a language other than English?  Yes  No
- Are minors required to sign a document indicating they understand rules and procedures?  Yes  No
- Are rules and procedures posted anywhere in the facility?  Yes  No

If yes, please indicate the number of postings and the locations.

Number:   24  

Locations:   All residential areas  

What steps are taken to ensure that minors are explained the rules and procedures in a developmentally appropriate manner?

During their intake, students review the rules and procedures with the intake social worker as well as their house staff. At this time, they sign the rules and procedures and have the chance to ask questions or raise concerns. Following this meeting, they are regularly reminded of rules and procedures in community meetings, house meetings, and individually as necessary.

**Personal Property and Monies:**

- Are personal property and monies recorded, stored, and returned upon release?  Yes  No

Describe the types of personal property that may be kept in sleeping rooms: Personal possessions including clothing, electronics, hygiene supplies, school supplies, etc.

**Youth Release and Transition:**

- Are there established protocols for transitioning youth out of the facility and into the community?  Yes  No
- Do facility staff members consult with the staff that will be assigned to the youth when they leave to discuss transition-related concerns?  Yes  No
- Has the facility received any complaints from parents regarding the transition process?  Yes  No
- Has the facility received any complaints from attorneys regarding the transition process?  Yes  No

**Accommodations for the Disabled:**

- Does the facility accept youth with disabilities?  Yes  No
- Has this facility been determined to be an inappropriate facility for a youth with a disability (*physical, developmental, emotional, psychological, intellectual, etc.*) in the 2012 calendar year ?  Yes  No
- ..... in the 2013 calendar year?  Yes  No

**SECURITY AND CONTROL**

**Permanent Logs:**

- Are there policies and procedures in place that describe the types of incidents and occurrences which must be documented on a daily basis?  Yes  No
- Are these logs stored electronically?  N/A  Yes  No
- If logs are stored electronically, is there sufficient technical support to ensure that the electronic files that contain these logs are not compromised, corrupted, or deleted?  N/A  Yes  No

**Security Features:**

- Does the facility have ample security features (cameras, locks, alarms, etc.)?  Yes  No
- Are there staff members on site who have the skills to maintain security features?  Yes  No

**Security Inspections:**

- Does the administrator in charge ever visually inspect the facility for security-related concerns?  Yes  No
- If yes, how often: at least weekly
- Are random reviews of security tapes conducted?  N/A  Yes  No

**Control of Dangerous Materials:**

- Are dangerous materials (toxins, biohazards, etc.) stored on site?  Yes  No

**Non-Hazardous Furnishings:**

- Are mattresses and bedding fire-resistant and non-toxic?  Yes  No
- SPA staff stated this was not a CCL requirement.*

**Control of Contraband:**

- Are there written policies that describe contraband?  Yes  No

Are there written policies that describe the disposition of contraband?  Yes  No

Has a weapon been found in the possession of a youth in the facility  
in calendar year 2012?  Yes  No  
in calendar year 2013? Pocket knives that were confiscated  Yes  No

Has a controlled substance (*i.e. alcohol, tobacco, illegal drugs, or prescription  
drugs for which the youth in possession does not have a prescription*) been  
found in possession of a youth during the  
2012 Calendar Year?  Yes  No  
2013 Calendar year?  Yes  No

Describe if there have been a high number of incidents related to a specific type of contraband:  
Contraband has been pill containers and smoking paraphernalia.

**Resident Searches:**

Do staff search sleep areas/rooms?  Yes  No

If staff search sleep areas/rooms, do staff search in the presence of the youth?  Yes  No

If staff search sleep areas/rooms, is clean bedding or clothes mixed with  
soiled bedding or clothes during this process?  Yes  No

**Accountability and Supervision:**

Describe measures taken to ensure that youth are supervised in a manner that provides for youth and staff safety.

All Child Care staff are trained upon their hiring and at regular intervals in Pro-ACT with a focus upon de-escalation and preventative strategies to minimize the use of any physical intervention or containment. The physical interventions taught in Pro-ACT are only used in the event that a youth is a direct and serious danger to themselves or someone else and that harm can be prevented through no other action. Searches may be written into the student's Needs and Service Plan and conducted in cases where there is a history of risk or is engaging in behaviors that place the community or themselves at risk. A basic visual search of pockets, clothing, and bags is done upon reentering S.P.A. from pass or alternate placement but not of the client's body. Another measure taken is the completion of the student's Needs and Services Plan as well as their Emergency Intervention Plan which describes particular ways to handle individual students in moments of crisis or when escalated. Part of this plan also includes a supervision addendum which sets the level of supervision that they require based on past and current behavior. While all students are supervised within the program, some students may require constant adult supervision while others can earn varying levels of adult monitoring giving them the ability to develop skills of independence.

**Use of Force/Physical Restraint /Safety Room Procedures/Searches:**

Are there written policies in place to ensure that force is used only when necessary?  N/A  Yes  No

Are there written policies in place to ensure that force is used only as long as necessary?  N/A  Yes  No

Is each instance of a use of force documented?  N/A  Yes  No

When there is an instance where force is used, does an internal committee or task force convene to discuss the incident?  N/A  Yes  No

**Non-routine Use of Restraints:**

Are there written policies in place to ensure that restraints are used only when necessary?  N/A  Yes  No

- Are there written policies in place to ensure that restraints are used only as long as necessary?  N/A  Yes  No
- Is each instance of a use of restraints documented?  N/A  Yes  No
- If yes, are these documents reviewed by the administrator in charge?  N/A  Yes  No

**Tool & Equipment Control:**

- Is there a written policy to ensure the adequate control of keys?  Yes  No
- Is there a written policy to ensure the adequate control of tools?  Yes  No
- Is there a written policy to ensure the adequate control of culinary utensils and equipment?  Yes  No
- Is there a written policy to ensure the adequate control of medical equipment?  Yes  No
- Is there a written policy to ensure the adequate control of supplies?  Yes  No
- Is there a written policy to ensure the adequate control of vehicles?  Yes  No

**Weapons Control:**

- Are weapons of any types permitted in the facility?  N/A  Yes  No
- Is there a weapons locker on site?  N/A  Yes  No

**Discipline:**

- Are there written policies that describe the discipline process?  Yes  No
- Are measure to taken to ensure that due process is preserved?  Yes  No
- Approximately what percent of discipline grievances/appeals are resolved in favor the youth? Not applicable due to grievances not dealing with disciplinary issues.

*Grievances were reviewed by JCC and although most did not include any information about resolution, none were about disciplinary issues.*

**Contingency/Emergency Plans:**

Are there written plans in place for the following contingencies/emergencies? Check all that apply.

- Contagious disease outbreak (Tuberculosis, Flu, etc.)
- Earthquake
- Fire
- Power outage/failure
- Unit Disturbance or Riot

**DISCIPLINE MODEL**

Overall, the S.P.A. philosophy and structure falls in line with the New Alternatives agency philosophy. This philosophy emphasizes healthy development and personal growth, therapeutic support rather than punitive methods, the significance of meeting basic needs and building toward meeting higher level needs, creating conditions that allow for growth towards one’s potential, and hopeful and positive expectations of the youth we serve.

**HOSPITALIZATION, ASSAULT AND AWOL HISTORY**

**Peer-to-Peer Assaults in Calendar Year:**

2012:

Total number of Peer-to-Peer Assaults: 49 (the majority of which were minor altercations with minimal intervention necessary)

Total number of Peer-to-Peer Assaults resulting in injury requiring treatment: 2

2013:

Total number of Peer-to-Peer Assaults: 40 (the majority of which were minor altercations with minimal intervention necessary)

Total number of Peer-to-Peer Assaults resulting in injury requiring treatment: 2

**Peer-to-Staff Assaults in Calendar Year:**

2012:

Total number of Peer-to-Staff Assaults: 1

Total number of Peer-to-Staff Assaults resulting in injury requiring treatment: 0

Total number of Peer-to-Staff Assaults resulting in law enforcement/ police/ probation contact: 0

2013:

Total number of Peer-to-Staff Assaults: 2

Total number of Peer-to-Staff Assaults resulting in injury requiring treatment: 0

Total number of Peer-to-Staff Assaults resulting in law enforcement/ police/ probation contact: 0

**Injuries within the youth “residences” (first aid, medical intervention, or hospitalization) in Calendar Year:**

2012:

Number of Instances: 46

2013:

Number of Instances: 83 (The majority of these injuries did not require first aid or a higher level of intervention. Most were due to sporting or recreational related activities)

**Youth hospitalized for psychiatric reasons (reasons, length of treatment) in Calendar Year:**

2012:

Number of Instances: 1

2013:

Number of Instances: 3

**Youth requiring higher level care (including placement at other NA sites) as temporary stabilization measures (include details: reasons, length, how many were unable to return etc.) in Calendar Year:**

2012:

Number of Instances: 14 youth required a higher level of care. Two of these students returned within 3-5 days as part of a temporary stabilization measure; 12 students required a higher level of care and did not return to S.P.A. All students who leave for a higher level of care have opportunity to re-apply to S.P.A. once the issues leading to their placement in a higher level of care has been addressed.

2013:

Number of Instances: 8 (Seven had a short term stabilization plan including necessary treatment and returned to the program. One required a higher level of care and did not return to the program.)

**AWOLs, including facility response and youth return in Calendar Year:**

2012:

Number of Instances:   9  

2013:

Number of Instances:   2  

**TRAINING, PERSONNEL, AND MANAGEMENT**

**Child Supervision and Staffing Levels:**

S.P.A. maintains at minimum a 1:6 staff-to-youth ratio and often higher when including supervisory staff, clinical staff, and program support positions. The current level set for SPA through Community Care and Licensing is a 1:10 ratio. Staff supervise in each of the student residences as well as other community and activity areas (gymnasium, rec rooms, outdoors). Clients are evaluated on a regular basis by the management team, residential staff, and clinical staff to determine their level of supervision.

**Training:**

Per Community Care and Licensing requirements and Title 22 Regulations, all childcare staff complete a minimum of 40 hours of training initially and 40 hours annually following their hiring. These trainings include in-service trainings on safety, first-aid/CPR, transporting clients, new staff orientation, Pro-ACT, Cultural Competency, etc. Additional trainings focused upon staff improvement and therapeutic skills include parenting training, communication skills, burnout and self care, self-harm and suicide, solution focused methods, substance abuse issues, psychotropic medication, etc. Teachers and counselors receive trainings set by their licensing bodies and as part of their ongoing continuing education.

Teachers are trained in Positive Behavior Intervention and Supports (PBIS). This is an ongoing professional development to refresh staff on building positive relationships with students. Staff is also trained in Trauma Informed Care (TIC). This training is done by the clinical staff on site and is periodically refreshed with staff.

SPA integrates Trauma Informed Care (TIC) training for staff, including SDCOE teachers, as possible.

**Facility Capacity and Crowding:**

At this time, SPA does not have the issues of crowding within the program due to the fact that SPA has not reached full capacity.

**CLASSIFICATION AND SEGREGATION**

**Describe how youth are classified and/or segregated:**

Youth are not segregated at the academy other than being separated by gender with a female and male side of campus. House selection is based on many factors which most often include age, risk factors, “goodness of fit” with house parents or lead staff, hobbies and interests, the resident’s level of structure needed, etc. After the youth is assigned, there is also flexibility if a change is requested or needed.

**Orientation:**

Youth are partially oriented before their intake to the Academy through student led tours, campus visits, and an interview process where a thorough program description is given. Upon intake, students meeting 1:1 with intake staff, house parents, clinician, and program supervisors to be introduced, oriented, to answer questions, and to familiarize students with the structure and opportunities within the program.

**Segregation:**

As stated above, youth are not segregated at the Academy with the exception of them being separated by

gender in their residences.

### COUNSELING AND CASEWORK SERVICES

Mental Health services are provided on campus at SPA by an EPSDT funded Full Day Rehabilitation program. This program offers milieu-based psychotherapy provided by BBS registered clinicians (individual therapy, group therapy, and family therapy), medication monitoring, basic medical services (2 LVNs on-site), recreational therapy, and a performing arts extra-curricular program. Program clinicians provide services, groups, trainings, and sessions after school each day, and there is a clinician assigned to each home on campus so they work collaboratively with house staff and other providers.

### GRIEVANCES, REPORTING INCIDENTS AND STAFF MISCONDUCT

- Is there a formal grievance policy?  Yes  No
- Are written grievances reviewed daily?  Yes  No
- Are grievances tracked in some manner that would permit facility leaders to observe trends in grievance reports?  Yes  No
- Is there a method for youth to be able to express concerns about the facility to a staff member who is not assigned to their cottage?  Yes  No
- Are youth made aware on a routine basis that they can express concerns about their placement to their case worker, social worker and/or attorneys?  Yes  No
- Is there a formal grievance process available for parents?  Yes  No
- If yes, how many parents have submitted grievances in 2012?   0
- If yes, how many parents have submitted grievances in 2013?   0

#### Reporting of Incidents:

Incidents are reported and documented according to the standards of Community Care and Licensing standards. Written documentation of significant incidents are reviewed by program administrators for coordination of any follow up activities to address the incident. Incident reports are also sent to Community Care and Licensing as well as Health and Human Services to enhance communication.

Resolutions of grievances are not systematically recorded.

#### Staff Misconduct:

- Are there written policies for addressing staff misconduct?  Yes  No
- Have there been any allegations in the calendar year of a staff member physically assaulting a youth?
- 2012:  Yes  No      2013:  Yes  No
- Have there been any allegations in the calendar year of staff member sexually assaulting a youth?
- 2012:  Yes  No      2013:  Yes  No
- Have there been any allegations in the calendar year of a staff member verbally threatening a youth?
- 2012:  Yes  No      2013:  Yes  No
- Have there been any allegations in the calendar year of a staff member touching a youth in any inappropriate way?
- 2012:      2013:



Yes  No

Yes  No

Have there been any allegations in the calendar year of a staff member commenting on the physical appearance of a youth in a manner that is outside the scope of the staff member's job duties?

2012:

Yes  No

2013:

Yes  No

Have there been any allegations in the calendar year of a staff member entering a youth's sleeping room for any reason that was outside the scope of the staff member's job duties?

2012:

Yes  No

2013:

Yes  No

If the answer is yes to any of the inquiries related to allegations, is there written documentation of the incident, follow-up, and responsive action?

2012:

Yes  No

2013:

Yes  No

Please describe the circumstances related to any of the allegations noted above: N/A

## **PROGRAMS AND ACTIVITIES**

### **School Program:**

The SPA high school is operated by the County Office of Education and serves the 9<sup>th</sup> -12<sup>th</sup> grade students residing at the Academy. A small number of middle school students attend the local middle school called San Pasqual Union.

After a request for a special education assessment is received, SPA initiates the following timelines: 15 days to prepare and send Parent/Guardian/ CASA (Educational Rights holder) the Evaluation Plan regarding the different assessments that JCCS will need to conduct; 60 days after JCCS receives signed Evaluation Plan from the Educational Rights holder to conduct assessments and convene the IEP meeting to determine eligibility and/or services.

In the 2012-2013 calendar year, three (3) students were identified with IEPs (special needs). In the 2013-2014 calendar year, three (3) students were identified with IEPs. In the 2012-2013 calendar year, twenty-two (22) students were on IEPs, and in the 2013-2014 calendar year, eighteen (18) students were on IEPs.

### **Parenting Classes:**

None of the students at the academy have children, however, they have had therapeutic groups focus on parenting skills for the youth at the academy as well as having trainings for house parent staff regarding parenting skills to equip them for some of the challenges and issues presented with this population of youth. Trainings for staff in 2013 have focused upon Trauma Informed Care, further preparing staff to address unique issues related to working with youth who have experienced complex trauma. Parenting classes for youth's family members is typically not provided due to them no longer living in the home or holding parenting rights.

### **Recreation and Exercise:**

Students can participate in a variety of recreational and exercise activities including formal sports teams that are part of the school CIF program, a campus intra-mural program, regular hikes, recreational trips and outings, use of the gymnasium and training facilities, health related activities sponsored by the Health and Wellness Center, etc. There is also a performing arts program that includes instrument lessons, voice lessons, dance, self-defense, and other performance oriented activities.

**Religious Program:**

Students are transported and supported in their attendance of religious services, following their particular faith tradition, within the community. It is typical for groups of students to attend religious services each week and some have also participated in mid-week religious activities when offered.

**Work Program/Vocational Training:**

Career counseling is formally provided by the Workforce Partnership (YES program), who offer career exploration and vocational assessment, career counseling, training, on- and off-campus internships (in collaboration with New Alternatives, Inc), and post internship placement. These services are also supported by the residential and clinical programs offering many of the internships available as well as helping counsel and direct students toward career interests and experiences.

**Visiting:**

Clinical and Residential staff provide supervised family visits in both on- and off-campus settings. When approved by County HHSA, some visits are able to become community, day, or overnight passes with family or friends that the students can participate in on a regular basis. When visits are required to be supervised by staff, they are monitored closely, documented, and intervention is used when necessary. SPA staff not only assist with the monitoring of the visitation but often transport students to locations where these visits take place for the convenience of both the student and those they are visiting due to the location of SPA. Family participation and engagement, when approved and appropriate, is strongly encouraged and supported by the Academy and its staff.

**Correspondence:**

Students are able to correspond on a regular basis with family members, friends, and informal supports in their lives unless otherwise restricted by their county social worker or the court.

**Access to Legal Services:**

All students are dependents of the court and thereby are assigned to an attorney. All students have access to their attorney’s contact information and attend court hearings every six months.

**HEALTH SERVICES**

SPA has a health and wellness center that houses two LVNs, as well as facilitates psychiatric and medical services. Approximately 30% of students are receiving psychotropic medication managed by a contracted psychiatrist who comes two days per week and provides medication monitoring services. Assessments of illness, monitoring and coordinating of medical appointments, and basic nursing care is provided by nursing staff. Routine physicals and evaluations are also available on campus with specialty and emergency services provided at the local hospital or Children’s Hospital. Nursing staff also conduct a variety of health-related programs and initiatives aimed at improving the overall health of the population.

**MEAL SERVICE**

Are kitchen staff members trained regarding sanitation and food handling procedures?  Yes  No

Have kitchen staff members received any training in the 2013 calendar year other than training given to newly hired employees?  Yes  No

If yes, describe what the training included: Food Handling Certification, ROP

Do youth work in the kitchen?  Yes  No

- If yes above, have they been trained?  Yes  No
- Are youth permitted to converse during meals?  Yes  No
- If yes, may a youth seated at one table converse with a youth seated at a different table?  Yes  No

Are meals served cafeteria style? Breakfasts and lunches on school days are available cafeteria style but all other meals are served in the homes family style.  Yes  No

Are youth permitted 20 minutes or more to eat?  Yes  No

Who/what agency maintains the kitchen area? New Alternatives

Describe the types of work youth perform: Food Preparation and Services as well as cleaning and sanitizing.

**Adequate and Varied Meals:**

Is there a weekly menu posted?  Yes  No

Does a nutritionist, dietitian, or other health professional participate in the creation of the menu?  Yes  No

How many calories per day does a youth who eats all of the standard meals provided consume? 2000 - 2200

What approximate percent of calories are from the following:

Protein: 40 %

Carbohydrate: 35 %

Fat: 25 %

Are weaker youths protected from having food taken from them?  Yes  No

**Special Diets:**

Can special diets be accommodated when medically necessary?  Yes  No

Was the facility unable to accommodate a special diet based on medical reasons during the 2013 calendar year?  Yes  No

Can special diets be accommodated when based on a youth's religious practices or beliefs?  Yes  No

Was the facility unable to accommodate a special diet based on a youth's religious practices or beliefs in the 2013 calendar year?  Yes  No

**SANITATION**

**Clothing and Personal Hygiene:**

Students are able to wear personal clothing and are given their own hygiene supplies for daily use. Upon entrance to SPA, each student is given a laundry schedule and has daily access to laundry services in their home. Part of the program's independent living skills training is to help the students learn to wash and effectively maintain hygiene and staff are there to support and ensure that these important activities are completed.

**Bedding and Linens:**

Bedding and Linens are also washed on a regular basis and as needed. Students have access to wash their bedding and linens and often as desired and cleanliness is a daily program expectation.

### **TRANSITION PLAN**

Throughout the high school year at SPA, students are working on various aspects of transitional planning including the acquisition of independent living skills from the moment they enter the program as part of the program's purpose. Skills such as managing money, doing laundry, cooking, cleaning, using transportation, etc are focused on by all of the collaborating partners and are blended into the student's every day experience at the academy. Specific transitional planning activities are increased during the student's junior and senior years with events such as college visits and trips, tours or transitional living programs including TLPs and THP+ programs, an increased focus on saving money that is earned, interviewing and applying for scholarships, and linking students with services and resources that they will need and use after their transition. It is common for residential and clinical staff to transport and help students move into new housing and/or college dormitories, ensure that they have their basic needs, and continue to support and be available for these students long after their transition. Students often return, considering SPA their home, for community events, to live during school breaks or times of need, and simply to visit other adults and students that have been important in their lives.