



State of Rhode Island
Rhode Island Department of Children, Youth and Families

December 1, 2023

WPM Consulting, President
1516 Beech Street
South Pasadena, CA 91030

Dear Mr. William Martone:

The Department has had the opportunity to review the consultation report, dated November 1, 2023, that you provided to St. Mary's. The report lacked specific action steps related to the deficits identified in the June 2023 DCYF Executive Summary Report, including the need for enhancement of communication among the senior administrators, as well as addressing overall safety concerns within the five units. While the brief report offered multiple recommendations, DCYF would respectively request that more substantive and specific recommendations and action steps be provided to assist St. Mary's in a comprehensive effort to improve care and treatment.

The purpose of DCYF's request for an independent consultant to be retained was to allow for a neutral party to assess, review and make detailed, concrete recommendations related to improving the overall physical conditions of the campus, enhancing communication at all levels, and improving engagement, care and treatment for youth. It was intended that the recommendations would be developed for direct care, clinical and management staff practices.

The Department recognizes that the agency has three program types: emergency assessment and stabilization for female youth, Acute Residential Treatment Services (ARTS) and the only Psychiatric Residential Treatment Facility (PRTF) in the state. We recognize the youth placed at St. Mary's have complex mental health needs and the overall acuity levels are high. That being said, the importance of enhanced training at all levels, and the need for clinical and nursing staff to be more present and engaged with the direct care staff and youth at each unit is critical. Additionally, further training is required as to overall supervision.

While the recommendations appear positive in terms of creating career ladders and enhancing bonus incentives for new hires to improve retention, it is evident that without immediate changes to the communication and management at the administrative level, the agency will continue to decline. The Division of Licensing is on-site at least once weekly, as well as at least once virtually or by telephone to address completed investigations and as screen outs, which are calls made to the Child Protection Hotline that do not meet the criteria for an investigation but require follow up by the Licensing team to determine what additional follow-up or corrective action plans are warranted. Some of the recurring findings that are of serious concern to DCYF include the following:

- It does not appear that weekly observations related to safety concerns (medication errors, glass visibly seen on the campus grounds multiple times, sharp objects routinely found in the bedrooms at the PRTF units) are being addressed in any sustained manner.
- St. Mary's is not adhering to its own policies and practices in a consistent manner, even though Licensing has continued to relay problematic finding to the residential manager and/or assistant residential manager on a weekly basis.
 - For example, each week random medication binders are reviewed by Licensing staff, but there continues to be errors in terms of recording. Additionally, despite meeting with the Head of Nursing, PRN medications have been continuously missing from the medicine cabinet, although listed on the child's medication administration record. The noted errors increase the likelihood of staff to dispense the wrong medication or give a youth a dose when not required.
 - Despite all office doors having an automatic locking mechanism, some office doors are continuously found to either be open or unlocked. This again poses a safety concern as there are confidential records and medications locked in such offices. A youth can easily access such if the office is left unsupervised.
 - Staff are failing to consistently complete 15-minute bedroom checks, which led, among other outcomes, to a sexual assault in the ARTS program. The sleep logs are not user-friendly and are not easy to review. Administrators are not reviewing the logs on a consistent basis despite a request for supervisors and administrators to review during each shift routinely and randomly.
 - The program continues to be unable to staff an on-site nurse during the evening hours of 11:00pm-8:00am, despite this being a component of the PRTF rate paid by DCYF and an acknowledged best practice.

Related, the report does not appear to incorporate the ongoing concerns about safety or treatment noted by the Department or the Office of the Child Advocate, including the following areas:

- Children and youth are continuing to elope and place themselves at significant risk while doing so (most recently, a child was hit by a car while eloping, requiring surgery). Although the youth placed at St. Mary's are certainly at higher risk of elopement and dangerous behaviors, the consultant report does not offer any recommendations related to reducing these elopements and increasing positive behaviors among youth.
- With this, the report does not provide any specific information on improvements to clinical interventions or practices that are needed to prevent incidents and behavioral dysregulation. St. Mary's has not communicated a clearly articulated clinical model or set of practices to prevent incidents to the department and is in need of clear recommendations for how to improve these areas.
- St. Mary's needs to improve practices to ensure consistent and uniform communication between shifts or between clinical staff and direct care staff.
- The report states that training needs to be improved but gives no recommendations on what specific training should be provided. DCYF has not been provided a training curriculum for St. Mary's staff and would strongly benefit from a targeted list of training topics to improve staff competencies and understanding of the behavioral health conditions and treatment interventions for the youth placed at St. Mary's.

Overall, the report lacks clear recommendations and direction as to next steps. The agencies' monthly corrective action plan in theory appears to reflect progress, but broken down, St. Mary's has not made significant progress over the past 5 months. As a result, Licensing continues to conduct weekly monitoring visits and the same deficits/errors are identified. The agency does not appear to be taking the recommendations seriously.

Sincerely,

A handwritten signature in black ink, appearing to read "Lori A. DAlessio". The signature is fluid and cursive, with the first name "Lori" and last name "DAlessio" clearly distinguishable.

Lori A. DAlessio
Administrator Family and Adult Services
Division of Licensing & Resource Families

Cc:
Ashley Director, DCYF Director
Carlene Casciano-McCann, St. Mary's Executive Director