



**Licensed Child Caring Agency Site Visit Report
Academic Boarding Schools**

Licensee: St. Mary's of Medford
Executive Director: Frank Phillips
Program Director: Rhonda Sheffield

Board Chairperson: Adam Peterson
Date of site visit: 2-23 and 2-24-21
Licensing Coordinator: Irvin Minten, M.S.W.

Other Regulatory or Accrediting Agencies: NW Accreditation, NW Association of Independent Schools, and NW Accreditation Commission.

Program Compliance: The program is or will be compliant with OAR 413-215-0001 through 0131 Licensing Umbrella Rules and OAR 413-215-0201 through 413-215-0276 Licensing Academic Boarding Schools. Personnel records and child files were reviewed and compliance with required background checks was documented for employees in all programs.

Program Description(s): St. Mary's School is a 153-year-old college preparatory school, offering over 20 Advanced Placement courses with functionally 100% of the students earning acceptance to four-year colleges and universities and a high level of academic achievement. The school is accredited by the Northwest Association of Independent Schools, The Northwest Accreditation Commission, and by AdvancED. St. Mary's School has 480 children grades 5-12, with 330 youth in the high school. The on-campus international boarding school houses 54 youth. Most of the youth are nationals of China, while others come from Korea, Vietnam, Indonesia, the UK and elsewhere. Students must have a proficiency in English as a foreign language. Students are admitted in accordance with a holistic examination of their applications, interviews, test scores and grades. The cost of tuition is \$57,000. Some students receive need-based financial aid. Employees at the international dormitory provide swing and night supervision and provide transportation, when needed. The international boarding school was started in 2011. In 2018, the current dormitory was built. Due to the COVID-19 pandemic, on-line classes are currently offered as part of a hybrid option.

Capacity and age-range: The capacity of the international boarding school is 54, ages 14 - 19.

Funding sources: Private pay.

Contracts and sources for referrals: Referrals come from word of mouth and various study abroad companies and agencies. Due to the COVID-19 pandemic, In the past 12-month period the program's director, Rhonda Sheffield, has not travelled internationally for recruitment. On a normal year, on average, Ms. Sheffield would travel internationally on 2 occasions for recruitment.

Average length of stay: The average international student remains in the program for 3 years. The great majority of the students remain until graduation.

Average daily population served: 54 in a non-COVID year. The program currently houses 25 international students due to the COVID-19 pandemic.

Number of children served annually: The program's average daily population is 54 in a non-COVID year. The program has averaged 35 youth in the past year due to the COVID-19 pandemic.

Interviews, Observations: During the course of the review, a great deal of conversation took place with Jim Meyer, International Boarding Program Principal; Kaelynn Welburn, Director of Human Services; Nick Phillips, legal counsel at the school; and Brett Bruins, Director of Residential Life. In addition, individual and random interviews were held with 2 dorm staff and 4 students at the international boarding school, as well as a history teacher at the high school. A tour was taken of the dorms and the St. Mary's School and campus.

During interviews and conversations with all staff and students, all reported that COVID-19 has presented significant challenges and has effected the program's ability to offer off-campus activities, events, and opportunities to socialize and integrate the youth within the boarding program with other students at the day school. It should be noted that unless the boarding school student's parents give permission, the boarding students were enrolled in on-line classes while keeping their social distance with one another in the high school cafeteria. Only about 20% of the boarding students were allowed by their parents to participate in in-person classes on the school campus.

During individual interviews with the 2 dorm staff and the 1 teacher at the school, both dorm staff reported they felt adequately trained, and both reported a good understanding of the program's suicide prevention and behavior management policies and procedures. Both staff also reported they enjoyed their jobs, that the school culture allowed them to suggest changes, and that they felt respected and appreciated by management staff. Both staff also reported no concerns about how the program was being run, and both stated they felt the youth in the program were being treated well and were safe. During interview of the St. Mary High School teacher, he reported the program did a very nice job in attempting to integrate the international boarding students with the day students, and he also felt that the program did a very nice job making the youth feel welcomed and listened to. He also reported he very much appreciated the boarding student's willingness and ability to learn.

During individual interviews with the 4 youth, all the youth reported they felt welcomed in the program and that they felt listened to and respected. They also all reported they felt safe and that their needs were being met. All the youth also reported the program did a good job in meeting their academic and individual needs. 2 of the youth reported the food was not that good, although they stated the program was attempting to cook food which they more preferred. Outside of the food, all the youth also reported they would not change anything about the program, although 1 of the youth wanted more business and language classes offered. All the youth also reported the program allowed them to call their parents whenever they wanted.

Program Strengths: The quality of academics at the school is very high. The staff to student ratio is also low, approximately 1 teacher to every 10 students. Youth get a great degree of choice in the curriculum in which they enroll, and students can receive college credit for many of the classes. The school has a high percentage of teachers with advanced degrees, and the turnover rate for teachers is very low. The international school can recruit youth with a history of academic success and a desire to be accepted into an elite college. The program challenges the students academically and prepares them for entrance into an elite college. The boarding school's AP and SAT scores are also much higher than the local and state average, and they continue to improve. Students at the boarding program do not attend the school for the sole purpose of graduating or to get a grade; rather they enroll with the expectation that they will be challenged academically and that they will thrive in the genuine intellectual community. The program also reports that they have not had any of the international boarding students test positive for COVID-19.

Program Challenges: COVID-19 has presented significant challenges as the great majority of the international boarding students are taking on-line classes while sitting in the high school cafeteria, as their parents have not provided them permission to participate in in-person classes on the high school campus. COVID-19 has also made it difficult to keep the boarding students entertained and connected, due to the measures needed to keep the youth safe. Integrating the students who are enrolled in the academic boarding school with the students of the St. Mary's school who come from the local community can be a challenge, something which has been made even more difficult due to COVID-19. International students may also find it difficult to break into the "cliques" within the St. Mary's School community, although this seems to be improving since the on-campus dorms were built in 2018. Roommates in the dorm also do not get along sometimes.

Changes that have occurred in the last 2 years: Program management report that in the past 2 years, their program's policies and procedures have been strengthened, as needed, as a result of their continuous improvement efforts and their desire to improve. The school has also installed very nice security fencing around the perimeter of the campus in the past two years. Finally, in their efforts to ensure the student's safety due to the COVID-19 pandemic, the school has had to implement a number of measures.

Lawsuits: NA

Grievances and complaints filed in the last two years: There have not been any grievances filed in the past 2 years. If a grievance is filed, the individual would first have a meeting with Rhonda Sheffield, Director of the International Program. If the dispute persisted, the individual would be provided a meeting with James Meyer, International Boarding Program Principal. Finally, if the grievance continued to not be resolved, the individual would be afforded a meeting with Frank Phillips, the program's Executive Director.

Corrective Actions and Timeframes: Please submit the following to verify compliance.

Within 45 days of receipt of this report St. Mary's of Medford must submit a letter of verification indicating the agency is in compliance with the specific rules cited above and describing how compliance will be maintained going forward. Along with the letter of verification, the agency must submit any and all specific documentation requested in the body of this report. The letter of verification and any additional requested documents can be emailed directly to Irvin Minten at Irvin.minten@dhsosha.state.or.us or sent by regular mail to the following address:

Department of Human Services, Children's Care Licensing Program
 Attn: Irvin Minten
 201 High St SE, Suite 500
 Salem, OR 97301

Recommendations: NA

Exceptions: NA

Changes in License: NA

Summary of Review					
Program and Services 413-215-0011(2)	Yes	No	N/A	Corrective Actions	Corrective Action Completed
Program and services are in scope of license	X				
Governance of the Agency 413-215-0021	Yes	No	N/A	Corrective Actions	Corrective Action Completed
(1)(a) Minimum of 5 board members	X				
(2)(f) Formally evaluate the exec. Director's performance annually	X				
(2)(g) Approves annual budget	X				
(2)(h) Obtain and review an annual independent financial review or audit of financial records.	X				
(2)(k) Written quality improvement program	X				
(2)(l) Meeting minutes	X				
Executive Director or Program Director 413-215-0021	Yes	No	N/A	Corrective Actions	Corrective Action Completed

(3)(a) knowledge of requirements for providing care and treatment appropriate to programs	X				
(3)(g) Approval from BCU	X				
Discipline, Behavior Management, and Suicide Prevention 413-215-0076	Yes	No	N/A	Comments	Corrective Action Completed
(3) Agency uses appropriate and positive methods of behavior management and nationally recognized non-violent crisis intervention	X				
(3)(b)(C) Agency does not use chemical and mechanical restraint (excluding medically necessary devices/prescriptions)	X				
(3)(c) Agency uses appropriate time-out rooms (adequate space, heat, light and ventilation and is not capable of locking) and documents use in child's record when applicable			X		
(3)(e) Agency uses seclusion appropriately/consistent with policy			X		
(4) Agency has plan in place to respond to suicidal behavior/warning signs	X				
Educational Services 413-215-0211	Yes	No	N/A	Corrective Actions	Corrective Action Completed
School is accredited	X				
Accrediting body ____AdvanceED_____					
(3) Secondary schools verify academic standards for students to obtain admission to institutions of higher education and receive a high school diploma or GED	X				
Physical Plant	Yes	No	N/A	Corrective Actions	Corrective Action Completed
413-215-0046(3)(a) Foster Rights Posted (if children in DHS custody)			X	- The dorm of the boarding school is only about 2 years old, is very nicely maintained, and offers an inviting atmosphere.	
413-215-0051(1) Sufficient safe space, equipment, and office equipment	X				
413-215-0091(12) License is posted in common area at each facility	X				
413-215-0001(5)(d) & 0221(1) Adequate furnishings and personal items	X				
413-215-0216(2)(a) & (c) Buildings are smoke free, clean and in good repair	X				

413-215-0216(2)(d) Rooms are free of harmful drafts, odors, and excessive noise	X				
413-215-0216(2)(e) Rooms are adequate in size and arrangement	X				
413-215-0216(2)(f) System provides a continuous supply of hot and cold water	X				
413-215-0216(2)(h) Building is well ventilated and room temperature is within a normal comfort range	X				
Room and Space Requirements Bedrooms 413-215-0218 (3)	Yes	No	N/A	Corrective Actions	Corrective Action Completed
(a) Adequate furnishings and personal items	X			- On a non-COVID year, students would share a room in the dormitory with another student. However, since the number of students in the dorm has dropped due to the COVID-19 pandemic, as about half have returned to their home country, each student is currently able to have their own room.	
(b) Separate from rooms used for dining, living, laundry, kitchen, and storage	X				
(c) Outside room with window allowing egress from building	X				
(d) Ceiling at least 90 inches	X				
(e) Minimum 60-SF per bed	X				
(f) No more than 25 if dorm style	X				
(g) Permanently wired fixtures	X				
(h) Window covering	X				
(i) Beds are 3 ft apart and maintained to ensure safety	X				
Room and Space Requirements Bathrooms 413-215-0218 (4)	Yes	No	N/A	Corrective Actions	Corrective Action Completed
(a)(A)&(B) 1:8 ratio for toilets and sinks	X				
(a)(D) Hot and cold running water, soap, and approved hand drying options	X				
(a)(E) 1:10 ratio for shower or bathtub	X				
(a)(F) Individual privacy	X				
(a)(G) Window covering	X				
(a)(H) Permanently wired fixtures	X				
(a)(I) Adequate ventilation	X				
Room and Space Requirements Kitchen 413-215-0218 (6)	Yes	No	N/A	Corrective Actions	Corrective Action Completed
(a) Used exclusively for storage, food preparation, dish washing and activities related to eating	X			- The school's main cafeteria includes a very well-equipped commercial kitchen.	
(b) Walls, floors are easily cleanable	X				
(c) Equipment and utensils are easily cleanable, durable, nontoxic, and kept clean	X				
(e) Equipment is easy to clean beneath, between and behind	X				
Room and Space Requirements	Yes	No	N/A	Corrective Actions	Corrective Action Completed

413-215-0218(2) There is a separate living room or lounge area – 15 SF minimum per child	X				
413-215-0218 (5) There is a separate dining room with capacity for ½ of children in care and 15 SF per child in care	X				
413-215-0218 (7) Laundry is separate from living areas, kitchen and dining	X				
413-215-0218 (8) Separate storage areas are provided for food, kitchen supplies, utensils, clean linens, soiled linens and clothing, cleaning supplies and equip, poisons, chemicals, outdoor recreational and maintenance equipment	X				
413-215-0218 (9) Outdoor activity area is protected from vehicles and other hazards and of a size and availability appropriate to the age and needs of children in care	X				
413-215-0218 (11) Time out rooms have adequate space, heat, light and ventilation and is not capable of locking			X		
Furnishings and Personal Items 413-215-0221	Yes	No	N/A	Corrective Actions	Corrective Action Completed
(1) There is a bed with frame, clean mattress and pillow and personal storage (dresser, closet)	X				
(2) Linens are in good repair. There is a waterproof mattress cover or mattress. Linens are appropriate and towels and washcloths are provided	X				
(3) Bedding is changed weekly or when soiled	X				
(4)&(5) Personal hygiene supplies and appropriate clothing are provided	X				
Food Services 413-215-0236	Yes	No	N/A	Corrective Actions	Corrective Action Completed
(1)(a) Meals are arranged daily, consistent with normal mealtimes that occur during the hours of operation	X				
(b) Snacks are available and provided as appropriate to the age and activity levels of children.	X				
(c) Menus are prepared in advance in accordance with USDA guidelines, provide a	X				

variety of foods and are adjusted for seasonal changes.					
(c) Menus are maintained for at least 6 months	X				
(d) Drinking water is freely available	X				
Safety – Emergency Plan 413-215-0241	Yes	No	N/A	Corrective Actions	Corrective Action Completed
(2)(a) Written emergency plan	X				
(2)(b) Telephone numbers for local police and fire are posted near all telephones	X				
(2)(c) Operative flashlights sufficient in number are readily available to staff	X				
(3)(a) Evacuation drill occurs monthly under varying conditions, is retained 2 yrs and contains; (A) identify of person conducting drill (B) date & time (C) notification method (D) staff participating (E) # of children & staff evacuated (F) special conditions simulated (G) problems encountered (H) time to complete	X				
(4)(a) The school protects children from potentially harmful items and materials.	X				
(4)(b) Direct supervision of children who do not have the ability to adjust and control water temperature	X				
(4)(c) Light fixtures have protective covers unless designed to be used without one	X				
Safety – Transportation 413-215-0241	Yes	No	N/A	Corrective Actions	Corrective Action Completed
(5)(b) Vehicle has insurance policy, is smoke free, safe operating condition, and has first aid kit and fire extinguisher 2-A:10-BC	X			- The international boarding program has access to 2 large vans which appear new and are well kept and maintained.	
Medication 413-215-0251	Yes	No	N/A	Corrective Actions	Corrective Action Completed
(3)&(4) Medications have a prescription, are current, secured, and kept in the original container	X			- Medications are locked and kept in the office at the dorm. At the time of the review, there were not any students in the dorm who were receiving any prescribed medications.	
(5) Medications are disposed in accordance with state and federal law	X				
(6) Written record of the disposal of medications is maintained and includes: (a) description	X				

(b) name (c) reason (d) method (e) staff & witness signature					
(7) Written record of the administration of medication includes: (a) name (b) description (c) dates, times (d) missed doses (e) medication disposed (f) method of administration (g) ID of person administering (h) possible adverse reactions (i) medication taken outside facility	X				
Minimum Staffing Requirements 413-215-0261	Yes	No	N/A	Corrective Actions	Corrective Action Completed
(1) Supervision is adequate for the type of program, location, time of day or night, age and type of children	X				
(2)(a) When one staff on duty, there is additional staff immediately available with max response time of 30 minutes	X				
Separation of Children 413-215-0266	Yes	No	N/A	Corrective Actions	Corrective Action Completed
(1) There is adequate supervision of children when there is children 18 years or older in care	X			- The female boarding students live on the first floor of the dorm and male students reside on the second floor.	
(2) There is adequate supervision of children if both males and females are served by the program	X				

Supplemental Information Provided by CCA	Yes	No	N/A	Comments	Corrective Action Completed
Documents as indicated on the form titled "Renewal Licensing Required Documents"	X				
Documents as indicated on form titled "Required Financial Documents and Information"	X				
All required policies and procedures as identified in the "Umbrella Rules"	X				

All required policies and procedures as identified in "Agency Type Specific Rules"	X				
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Personnel Files 413-215-0061	Yes	No	N/A	Corrective Actions	Corrective Action Completed
Staff Name	X			- The boarding program maintains some electronic and some hard copy personnel records. - Personnel records of 3 dorm staff were reviewed during this review.	
Position	X				
(3)(g) Date of Hire	X				
(3)(a) record of education, training and previous employment	X				
(1)(b) & (3)(b) reference checks complete and documented	X				
(1)(a) & (3)(c) Background check was completed and documented	X				
(3)(d) Annual performance evaluations	X				
(3)(f) Record of personnel actions	X				
(3)(g) Termination date, reason for termination			X		
(3)(h) Current job description (1)(c) Employee meets minimum qualifications stated in current job description	X				
New Employee Orientation (30 days) 413-215-0061(4)	Yes	No	N/A	Corrective Actions	Corrective Action Completed
(a) Agency policies and procedures	X				
(b) Ethical and professional guidelines	X				
(c) Organizational lines of authority	X				
(d) Attributes of population served	X				
(e) & (5)(a) to (c) Mandatory reporting that includes: (a) legal definition of child abuse ORS 419B.005, Oregon Laws 2016, chapter 106, section 36 (b) legal responsibility to immediately report (c) legal responsibility to report is personal to the employee	X				
(f) Privacy laws	X				
(g) Emergency procedures	X				
Ongoing Training	Yes	No	N/A	Corrective Actions	Corrective Action Completed

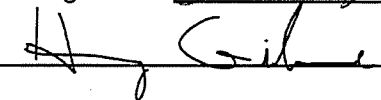
413-215-0236(2)(b) Employees who handle food served to children have a valid food handler's card			X		
413-215-0061(5) Mandatory reporting (annually) that includes: (a) legal definition of child abuse ORS 419B.005, Oregon Laws 2016, chapter 106, section 36 (b) legal responsibility to immediately report (c) legal responsibility to report is personal to the employee	X				
413-215-0241(5)(a) Employees transporting children meet the driver requirements (current driver's license, insurance, trained in emergency procedures, and training for 15+ passenger vans if applicable)	X				
413-215-0261(2)(b) One staff over 18 and current CPR/First Aid certification on site all times when children are in care	X				
Contractors (if applicable) 413-215-0061(6)	Yes	No	N/A	Corrective Actions	Corrective Action Completed
(a) Agency ensures the contractor meets the requirements of this rule and Chapter 413 division 215		X		- The program contracts with Avian Food Service for the purchase, preparation, and the serving of food to the international boarding students. • There are three contracted food service employees through Avian Food Service. These employees had not completed the required new employee orientation and ongoing trainings. The program will need to ensure that all contracted food service employees who prepare and serve food to the boarding students receive all required new employee orientation and ongoing trainings.	
(b)(B) Contract includes the following: (i) Services provided (ii) Contractor fees (iii) Disclosure of information from contractor to agency (iv) Lines of authority (v) Adherence to rules, including background check (vi) Any liability of the agency for acts of the contractor, rights of indemnity and limitations on liability	X				
Comments:					

Children's Records	Yes	No	N/A	Corrective Actions	Corrective Action Completed
Name of Child	X				

Health Services – Medical History 413-215-0246	Yes	No	N/A	Corrective Actions	Corrective Action Completed
(2) Medical history obtained within 30 days (significant findings, current immunizations, history of surgical procedures-health issues-injuries, allergies, dental, vision, hearing, behavioral health, and physician orders)	X				
(3)(a) to (f) Medical exams (3 in first year of life, 2,4,6,9,14)	X				
Consents 413-215-0271	Yes	No	N/A	Corrective Actions	Corrective Action Completed
(a) Consent to provide routine and emergency medical care	X				
(b) Consent to provide care	X				
(c) Consent to allow access	X				
Authorizations 413-215-0271	Yes	No	N/A	Corrective Actions	Corrective Action Completed
(3) Authorizations are pre-approved to allow children to participate in potentially hazardous activities, including but not limited to using motorized yard equipment, swimming, and horseback riding.	X				
Information about children in care 413-215-0276 Files contain the following information:	Yes	No	N/A	Corrective Actions	Corrective Action Completed
(1) The name, gender, and date of birth	X				
(2) The date of admission	X				
(3) The name, address, and telephone number of: (a) The child in care's parents. (b) The child in care's legal guardian, if different than the parents, and a copy of the document that provides for his or her authority over the <i>child in care</i> .	X				
(4) Incident Reporting. A written description of any injury, accident, or unusual incident	X				
(5) Any required signed consents and authorizations.	X				
Records and Documentation 413-215-0071	Yes	No	N/A	Corrective Actions	Corrective Action Completed
(1) Stored safely	X				
(2) Permanent, legible, dated, and signed	X				

(3)&(4) Uniform in organization, readily identifiable and accessible, current, and complete, containing all required info. No eraser tape or white out.	X			
(7) Permanent registry for each child in care includes (name, gender, birth date, names, addresses of parents or guardians, dates of admission, and placement upon discharge)	X			
Comments: 				

Licensing Coordinator's Signature:  Date: 3-11-21

Manager Review:  Date: 03-03-2021