



Licensed Child Caring Agency Site Visit Report Academic Boarding Schools

Licensee: Oregon Episcopal School
Executive Director: Mo Copeland
Program Director: Sarah Grenert-Funk

Date of site visit: March 11, 2022
Licensing Coordinator: Holly Ivey

Other Regulatory or Accrediting Agencies: Northwest Association of Independent Schools.

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

Program Description(s): Oregon Episcopal School established in 1869, is an independent college preparatory day and boarding school. The school offers classes from pre-kindergarten through 12th grade, with approximately 880 students. The school is located on a 59-acre campus in Portland's West Hills. The boarding school serves students in grades 9 through 12. Many of the students in the boarding program are international students. The school has approximately 58 boarding students. The boarding program has approximately 7 full time staff. A nurse, counselor, and academic support staff also serve the dorm students in a supportive role. Tuition for the boarding program for the 2021-2022 school year was \$69,100.

Capacity and Age Range: The capacity of the two dorm buildings is 70 students, 14-20 years of age.

Funding sources: Student's tuition, endowment, parents donating to the annual fund, and the school auction are the main funding sources for the school.

Contracts and sources for referrals: N/A contracts, students apply for admission.

Average length of stay: Most students board at the school all four high school years.

Average daily population served: For the 2021-2022 school year there were 58 boarding students.

Number of children served annually: There were 58 boarding students, in the 2021-2022 school year.

Interviews, Observations:

Interviews: During the review Sarah Grenert-Funk Director of Resident Life, Peter Buonincontro, Assistant Director of Residential Life, Veena Lyengar Human Resource Coordinator, and three boarding youth were interviewed. When asked what the students appreciated most about the boarding program, the students reported the following: "Sense of an individual space, they receive help from the House Parents, the whole environment is good, a lot of variety of people coming from different cultures." All students interviewed reported receiving enough food to eat, with daily snacks provided. The students all reported feeling safe at the school and that dorm parents were always available to talk to if they had concerns. There were no concerns reported to the Licensing Coordinator in the interviews.

Observations: During the review staff and students were observed on campus. A tour was conducted of the dorm in all areas where students have access. The dorms were observed to be clean and in good repair with very minor repair needs, any deficiencies of rule have been noted in the report below. The dorms were well kept, a cleaning service cleans all shared spaces daily. Students are required to clean their bedrooms weekly. A contractor is responsible for all meals, and they are prepared fresh onsite in the school cafeteria.

Program Strengths: The following strengths were identified by the Boarding Program Director at the review:

- "High level of engagement by students and dorm parents in the program.
- An abundance of resources for activities, events, support, etc.
- Student leadership and mentoring happen both in the social arena, as well as academics.
- An engaged and bonded dorm team that collaborates with one another and works in service of student best interest."

Program Challenges: The following challenges were identified by the Boarding Program Director at the review:

- "Ongoing Covid pandemic concerns around mental health and social struggles.
- Reintegrating the dorm students who were remote last year back into the community. Navigating the ongoing restrictions."

Changes that have occurred in the last 2 years: The following changes were identified by the Boarding Program Director at the review:

- "We have retained a strong core dorm team and added a couple great young dorm parents recently.
- Covid has added a lot of changes.
- The facility remains the same, although we have plans to renovate the kitchen in the dorm office - update it and make it more community focused.
- We had a change of leadership, but that did not work out, so the previous director is back in an interim capacity."

Lawsuits: None were reported.

Grievances and complaints filed in the last two years: None were reported.

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

Within 45 days of receipt of this report Oregon Episcopal School, 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 Holly Ivey Holly.r.ivey@dhsosha.state.or.us or sent by regular mail to the following address:

Department of Human Services, Children's Care Licensing Program
Attn: Holly Ivey, DHS Licensing Coordinator
201 High St SE, Suite 500
Salem, OR 97301

Exceptions: The Program Manager requested an exception for mattress covers, laundry pods, and disinfecting wipes to be kept in students' bedrooms. (The request is in process, and has been granted since 2019)

Changes in License: There are no changes to be made to the license.

Summary of Review					
Program and Services 413-215-0011(2)	Yes	No	N/A	Corrective Actions/Comments	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/Comments	Corrective Action Completed
(1)(a) Minimum of 5 board members	X			Governance of the Agency 413-215-0021(2)(f) Formally evaluate the exec. Director's performance annually The Executive Director's annual performance appraisal for 2019-2020, and 2020-2021, were not found in the personnel file reviewed.	
(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/Comments	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	Corrective Actions/Comments	Corrective Action Completed
(3) Agency uses appropriate and positive methods of behavior management and nationally recognized non-violent crisis intervention (The school utilizes: Restorative Justice)	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				
Contractors (if applicable) 413-215-0061(6)	Yes	No	N/A	Corrective Actions/Comments	Corrective Action Completed
(a) Agency ensures the contractor meets the requirements of this rule and Chapter 413 division 215			X		
(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		
Supplemental Information Provided by CCA	Yes	No	N/A	Corrective Actions/Comments	Corrective Action Completed

Documents as indicated on the form titled "Renewal Licensing Required Documents"		X		The following documents must be provided to the Licensing Coordinator • Environmental Inspection • Verification of Insurance (Declaration page for the fire, auto, and liability insurance) • Certification of Occupancy • Tax Compliance Certificate (At the time of the review the certificate had been applied for, but the school had not received the certificate back)	
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				
Educational Services 413-215-0211	Yes	No	N/A	Corrective Actions/Comments	Corrective Action Completed
School is accredited	X				
Accrediting body: Northwest Association of Independent Schools					
(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/Comments	Corrective Action Completed
413-215-0046(3)(a) Foster Rights Posted (if children in DHS custody)			X	Physical Plant 413-215-0216(2)(a) &(c) Buildings are smoke free, clean and in good repair • The following was observed requiring repair: 1. A small spot in the ceiling of the girl's bathroom requiring repair 2. A small spot in the ceiling in the boy's bathroom requiring repair.	
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/Comments	Corrective Action Completed
(a) Adequate furnishings and personal items	X				
(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/Comments	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/Comments	Corrective Action Completed
(a) Used exclusively for storage, food preparation, dish washing and activities related to eating	X				
(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/Comments	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/Comments	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/Comments	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/Comments	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/Comments	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				
Medication 413-215-0251	Yes	No	N/A	Corrective Actions/Comments	Corrective Action Completed
(3)&(4) Medications have a prescription, are current, secured, and kept in the original container	X				
(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/Comments	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/Comments	Corrective Action Completed
(1) There is adequate supervision of children when there is children 18 years or older in care	X				
(2) There is adequate supervision of children if both males and females are served by the program	X				

Personnel Files 413-215-0061	Yes	No	N/A	Corrective Actions/Comments	Corrective Action Completed
Staff Name	X			Personnel Files 413-215-0061(3)(d) Annual performance evaluations Performance evaluations for 2020 were missing, in the files reviewed.	
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/Comments	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/Comments	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				
Comments:					

Children's Records	Yes	No	N/A	Corrective Actions/Comments	Corrective Action Completed
Name of Child	X				
Health Services – Medical History 413-215-0246	Yes	No	N/A	Corrective Actions/Comments	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/Comments	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/Comments	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/Comments	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/Comments	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:					

Corrective Action:

413-215-0078

Licensing Umbrella Rules: Information Provided to Children in Care

(Adopted 02/01/2022)(1) Each child in care receiving services from a child-caring agency must be given the following:

- (a) Instruction regarding how a child in care may report suspected inappropriate use of restraint or involuntary seclusion;
- (b) Assurance that the child in care will not experience retaliation for reporting suspected inappropriate uses of restraint or involuntary seclusion and;
- (c) The telephone number for the toll-free child abuse hotline described in ORS 417.805 and the telephone numbers and electronic mail addresses for the program's licensing agency, the child in care's caseworker and attorney, the child in care's court appointed special advocate and Disability Rights Oregon.

- Individual documentation was not provided to verify that the required information listed in the rule excerpt above was provided to all boarding students. Signatures verifying the receipt of the information must be obtained and documentation retained.

Required Policy Revisions:

413-215-0056 Licensing Umbrella Rules: Policies and Procedures (*Amended 1/1/19*) (2) In addition to other policies and procedures required by these rules, the policies and procedures in section (1) of this rule must include: (a) A written policy on mandatory child abuse reporting, consistent with ORS 418.257, 418.258, 419B.005, 419B.010, and 419B.015 that includes requirements that child-caring agency employees, staff, contractors, agents, and proctor foster parents do all of the following:

- The Child Abuse Policy states the following, **“Oregon Episcopal School does not tolerate, and unequivocally opposes, any form of child abuse or neglect. OES follows all of Oregon's laws regarding prevention, identification and mandatory reporting of child abuse and sexual misconduct by school employees (see ORS Chapter 419B and ORS Chapter 339).”** The policy must include 418.257, and 418.258.

(A) Immediately report suspected child abuse directly to the Department via the child abuse reporting hotline.

- The Child Abuse Policy states, **“Any employee who has reasonable cause to believe that an adult has engaged in child abuse (as defined by Oregon’s mandatory reporting laws) or educator sexual misconduct is required to report their suspicions to a law enforcement agency or the Department of Human Services (DHS). The employee should also immediately report these suspicions to the head of school or the director of human resources, as well as division counselors. The division counselor will promptly assist the reporting employee to properly document the report and cause the report to be made to the Oregon Department of Human Services (DHS), also known as Child Protective Services (CPS).** The policy must direct the employee to immediately call the State Child Abuse Hotline 1-855-503-7233, after making the report, the employee may contact their division counselor, but not prior.

(B) Receive child-caring agency-provided training on mandatory abuse reporting requirements as part of employee orientation and at least annually thereafter as described in OAR 413-215-0061.

(C) Receive child-caring agency-provided training on the definitions of child abuse in ORS 418.257 and 419B.005 that apply in child-caring agencies.

- The Child Abuse Policy states, **“Training on the prevention and identification of abuse and sexual misconduct, as well as the employees’ reporting obligations, is provided on an annual basis for all OES school personnel.”** The policy must indicate that training must occur as part of the employee orientation (within 30 days) and annually. The training must consist of the definitions of child abuse in ORS 418.257 and 419B.005 that apply in child-caring agencies, and this must be added to the policy.

413-215-0066 Privacy (*Amended 06/29/18*) (2) Except as provided in section (4) of this rule, a *child-caring agency* may not disclose any identifying information of a *child in care*, including a picture, without first obtaining the written consent from the child's parents or legal guardians.

- The privacy policy was missing, “to include a picture”

Licensing Coordinator's Signature: Holly Ivey Date: 3-31-22

Manager Review: H. Gilmer Date: 3-31-2022