



Licensed Child Caring Agency Site Visit Report Residential Care

Licensee: West Linn Clementine
Executive Director: Melissa Peterson

Date of site visit: January 25, 2023
Licensing Coordinator: Holly Ivey

Other Regulatory or Accrediting Agencies: Joint Commission, and the Oregon Health Authority

Program Compliance: The program was found to be compliant or will be compliant with OAR 419-400-0005 to 419-400-0310, Licensing Umbrella Rules, and OAR 419-470-0010 to 419-470-0180, Licensing Residential Care Agencies Rules. Personnel records were reviewed and compliance with required background checks was documented for employees in all programs.

Program Description(s): *West Linn Clementine is a residential facility exclusively for adolescent girls seeking treatment for multiple eating disorders or exercise addiction. They offer medical and psychiatric care integrated with personalized clinical and nutritional care as well as academic and family support. The program offers 24 hour on-site medical oversight and nursing care, weekly medical monitoring, 24-hour access to psychiatrists, medication management, family involvement, individual and group counselling sessions and weekly nutrition and cooking groups. The program serves females, ages 11-17 with a capacity of 12.*

Program type and services: Residential Services that specialize in eating disorders treatment.

Capacity and Age Range: 12 youth, ages 11-17 years old.

Funding sources: Medicaid, private insurance, Oregon Health Plan and private pay.

Contracts and sources for referrals: Contracts with insurance companies.

Average length of stay: The average length of stay is 45 days.

Average daily population served: The average daily population is 11 youth.

Number of children served annually: Approximately 79 youth served.

Use of seclusion or restraint: N/A

Interviews, Observations:

Staff Interviews:

The following staff were informally interviewed by the Licensing Coordinator at the review: Miranda Acharya, Clinical Director, Staci Fajardo, Program Manager, Kelly Grove, Human Resources.

Youth Interviews:

Two youth were privately interviewed by the Licensing Coordinator at the review. The youth interviews consisted of the following information obtained:

- Both youth stated things were going well at the program. One youth stated, “Clementine is a great place, I feel like it has helped me a lot.”
- When the youth were asked what they appreciated most about the program, the following was stated by the youth: “The staff are really supportive, and so are the clients, it’s just a nice environment.” “The staff and peers, the therapy groups with staff and peers that we have every day.”
- When the youth were asked what they enjoy doing for fun at the program, the following was stated by the youth: “Watch movies, listen to music, make bracelets, knitting, art projects, painting.” “There are a lot of books, and puzzles, we do tie die, and we’ve done a spa day.”
- Both youth confirmed that they have daily contact with their approved contacts outside of the program and that they are private phone calls.
- Both youth stated that they receive three meals a day and are provided three snacks a day. The youth stated, “There is always enough food here, it is never a problem. The cooking is great, it makes me happy.” “I can always ask for seconds.”
- Both youth confirmed they receive hygiene products from the program if needed.
- Both youth stated they felt respected by staff at the program. One youth stated the following, “The staff always knows what to do, and what to say.”
- When the youth were asked what they would change about the program, the following was stated by the youth: “The cost of attending, some people have to pay before the insurance approves it. I wouldn’t be able to do that.” “It’s a pretty good place, I’d say.” “Longer time for phone calls, it goes by so fast.”
 - The youth reported that they have one ten minute, and one five-minute phone call per day.
 - After the youth reviews, the Licensing Coordinator, spoke with Miranda Acharya, Clinical Director, about the youths desire to have lengthened phone call time. Ms. Acharya stated that youth can ask staff for additional phone calls if they would like/need it.
- Both youth stated they felt safe at the program.

Observations: A walk through of the site was conducted by the Licensing Coordinator. The youth at the programs were observed to be at ease and comfortable in the environment. All areas of the program (inside and outside) where youth had access were observed to be well kept, clean and in good repair. The program had a new dining room table and new furniture in a therapy room. The program has a commercial cleaning company that cleans the facility three times a week. The cleaning company also washes and changes the youth’s linens and towels. The agency vehicles that the youth ride in were observed and met all the requirements per Licensing Rules. Food was observed to be in the refrigerator and in the pantry. The program has a chef who is responsible for the meals, which are prepared fresh onsite. The program has a dietitian that ensures the residents receive proper nutrition. Medication was observed to be locked up and inaccessible to the youth.

Program Strengths: The following strengths were stated by leadership at the review:

“Well educated staff that easily builds strong therapeutic relationships with clients and their families; reliable staff that is passionate and excited to be at work, which creates a positive work environment; professional; great communication between staff and clients; united team; home-like environment; client centered/empowerment at forefront with their treatment.”

Program Challenges: The following challenges were stated by leadership at the review:

“Staff can be overly responsive/reactive to certain incidences/crises that can cause anxiety, which has required additional training and supervision.”

Changes that have occurred in the last 2 years: The following changes were stated by leadership at the time of the review:

“Staff turnover past two years (direct care staff and therapists); COVID safety precautions; Increase in acuity of the clients that have admitted.”

Lawsuits: None identified at the time of the review.

Grievances and complaints filed in the last two years: None of significance acknowledged at the time of the review.

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

Within 45 days of receipt of this report West Linn Clementine, 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 at Holly.r.ivey@dhsosha.state.or.us

Exceptions: N/A

Changes in License: N/A

Summary of Review				
Program and Services 419-400-0020 (2)	Yes	No	N/A	Corrective Actions/Comments
Program and services are in scope of license	X			
Governance of the Agency 419-400-0040	Yes	No	N/A	Corrective Actions/Comments
(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		Governance of the Agency 419-400-0040(2)(g) Approves annual budget The board minutes submitted to Licensing verified the budget was reviewed by the board. However, there was no documentation verifying the board <i>approved</i> the budget. The program must provide the Licensing Coordinator with written documentation, such as additional board minutes, e-mails or a signed letter, indicating the board's approval of the program's budget.
(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 419-400-0040	Yes	No	N/A	Corrective Actions/Comments
(3)(a) knowledge of requirements for providing care and treatment appropriate to programs	X			
(3)(g) Approval from BCU		X		Executive Director or Program Director 419-400-0040(3)(g) Approval from BCU A copy of documentation from the ODHS Background Check Unit's (BCU) approval of the Executive Director must be submitted to the Licensing Coordinator. At the review the agency was awaiting a fitness determination from the BCU.
Discipline, Behavior Management, and Suicide Prevention 419-400-0150	Yes	No	N/A	Corrective Actions/Comments
(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 adequate plan in place to respond to suicidal behavior/warning signs	X			
Contractors (if applicable) 419-400-0120(6)	Yes	No	N/A	Corrective Actions/Comments
(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	
Restraints and Involuntary Seclusion 419-400-0180	Yes	No	N/A	Corrective Actions/Comments
(11)(d) Each child caring agency that submits a report under this section shall make its quarterly report available to the public upon request at the Child Caring Agency's main office and on the child caring agency's website if applicable.	X			
Supplemental Information Provided by CCA	Yes	No	N/A	Corrective Actions/Comments
Documents as indicated on the form titled "Renewal Licensing Required Documents"		X		Supplemental Information Provided by CCA Documents as indicated on the form titled "Renewal Licensing Required Documents" The program must provide the Licensing Coordinator with documentation of updated approvals for Miranda Acharya and Staci Fajardo from the ODHS Background Check Unit (BCU).
Documents as indicated on form titled "Required Financial Documents and Information"	X			
All required policies and procedures as identified in the "Umbrella Rules"		X		Supplemental Information Provided by CCA All required policies and procedures as identified in the "Umbrella Rules"

				*See page 16 for details of Umbrella Policy Revision requirements.
All required policies and procedures as identified in "Agency Type Specific Rules"	X			
Physical Plant	Yes	No	N/A	Corrective Actions/Comments
419-400-0090(3)(a) Foster Rights Posted (if children in DHS custody)	X			
419-400-0100(1) Sufficient safe space, equipment, and office equipment	X			
419-400-0230(12) License is posted in common area at each facility	X			
419-470-0020(2)(a) &(c) Buildings are smoke free, clean and in good repair	X			
419-470-0020 (2)(d) Rooms are free of harmful drafts, odors, and excessive noise	X			
419-470-0020 (2)(e) Rooms are adequate in size and arrangement	X			
419-470-0020 (2)(f) System provides a continuous supply of hot and cold water to taps located throughout the facility	X			
419-470-0020 (2)(h) Building is well ventilated and room temperature is within a normal comfort range	X			
419-470-0030 (1) All parts of the facility ensure the safety of children	X			
Room and Space Requirements	Yes	No	N/A	Corrective Actions/Comments
419-470-0030				
(2) There is a separate living room or lounge area – 15 SF minimum per child	X			
(5) There is a separate dining room with capacity for ½ of children in care and 15 SF per child in care	X			
(7) Laundry is separate from living, kitchen, and dining areas	X			
(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. (Hazardous materials are properly labeled, in original container and locked)	X			
(9) Outdoor activity area is protected from vehicles and other hazards and of a size and	X			

availability appropriate to the age and needs of children in care				
(11) Time-out rooms: Rooms used for time out or quiet time must have adequate space, heat, light and ventilation and must not be capable of locking.			X	
Room and Space Requirements Bedrooms 419-470-0030(3)	Yes	No	N/A	Corrective Actions/Comments
(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			
Room and Space Requirements Bathrooms 419-470-0030(4)	Yes	No	N/A	Corrective Actions/Comments
(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)(E) Individual privacy	X			
(a)(F) Window covering	X			
(a)(G) Permanently wired fixtures	X			
(a)(H) Adequate ventilation	X			
(b)&(c) Wooden racks on floors are prohibited and impervious shower mats are disinfected & dried daily			X	
Room and Space Requirements Kitchen 419-470-0030(6)	Yes	No	N/A	Corrective Actions/Comments
(a) Used exclusively for storage, food preparation, dishwashing, 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			
Furnishings and Personal Items	Yes	No	N/A	Corrective Actions/Comments

419-470-0040				
(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 419-470-0070	Yes	No	N/A	Corrective Actions/Comments
(1)(a) Meals are arranged daily, consistent with normal mealtimes that occur during the hours of operation	X			
(1)(b) Menus are prepared in advance in accordance with USDA guidelines, provide a variety of foods and are adjusted for seasonal changes.	X			
(1)(b) Menus are kept for at least 6 months	X			
(1)(c) Drinking water is freely available	X			
(2)(a) Food is stored, prepared & served in a sanitary manner	X			
(2)(c) & (d) Food products are obtained from commercial suppliers (exception of fruits & vegetables), unpasteurized juice is prohibited, and only Grade A pasteurized and fortified milk in appropriate container.	X			
Residential Care Safety 419-470-0080	Yes	No	N/A	Corrective Actions/Comments
(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 years 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		X		Residential Care Safety 419-470-0080 (3)(a) Evacuation drill occurs monthly under varying conditions, is retained 2 years and contains: (F) special conditions simulated The documentation of some of the evacuation drills was missing the above required information.

(G) problems encountered (H) time to complete				
Umbrella Safety 419-400-0200	Yes	No	N/A	Corrective Actions/Comments
(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			
(1)(b)(A) Each vehicle used to transport a child in care must be: properly registered, covered by an insurance policy in full force and effect, maintained in safe operating condition, and smoke-free.	X			
(3) If a child-caring agency has a swimming pool on the premises that is accessible to children in care or if a child-caring agency plans to have children in care engage in swimming, the child-caring agency must have and adhere to policies and procedures that address, at a minimum, providing disclosures and obtaining consents, assessing swimming ability of children in care, and ensuring the safety of pool access.	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			
Medication 419-470-0100	Yes	No	N/A	Corrective Actions/Comments
(3) & (7)(e) Medications have a prescription and are stored in the original container with prescription label	X			
(4) & (5) Herbal supplements and remedies, medical treatments, special diets, physical therapy, physical aides or limitations have a written order signed by a physician or qualified medical professional.	X			
(7)(c) Medications are inaccessible to children	X			
(8) Medications are disposed in accordance with state and federal law	X			
(9) Written record of the disposal of medications is maintained and includes: (a) description and amount	X			

(b) name (c) reason (d) method (e) staff & witness signature				
(10) Written record of the administration of medication includes: (a) name (b) description (c) dates and 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			
Extracurricular, Enrichment, Cultural & Social Activities 419-470-0110	Yes	No	N/A	Corrective Actions/Comments
(2) Children have ongoing opportunities to participate in at least one age-appropriate or developmentally appropriate activity	X			
Minimum Staffing Requirements 419-470-0130	Yes	No	N/A	Corrective Actions/Comments
(1) & (2) Supervision is adequate for the type of program, location, age and type of children, ability of supervisor to respond, electronic back-up systems. Minimum ratios are maintained: Under 30 months of age: 1:4 30 months to > 6 years or non-ambulatory: 1:6 Ages 6 and older: 1:7 Overnight (staff awake) 1:10	X			
(4)(a) When one staff on duty, there is additional staff immediately available with max response time of 30 minutes	X			
(5) There is at least one on-site employee authorized to apply the reasonable and prudent parent standard	X			
Separation of Residents 419-470-0140	Yes	No	N/A	Corrective Actions/Comments
(1) Children are in separate bedrooms than adults, unless parent and child, or there is	X			

written approval from guardian/parent and licensing coordinator				
(2) There is adequate supervision of children if both males and females are served by the program			X	

Personnel Files 419-400-0120	Yes	No	N/A	Corrective Actions/Comments
Staff Name/Position	X			
(3)(g) Date of Hire	X			
(3)(a) record of education, training, and previous employment	X			
(1)(b) & (3)(b) reference checks completed and documented	X			
(1)(a) & (3)(c) Background check 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 – Umbrella Requirements (30 days) 419-400-0120(4)	Yes	No	N/A	Corrective Actions/Comments
(a) Agency policies and procedures	X			
(b) Ethical and professional guidelines	X			
(c) Suicide prevention and intervention	X			
(d) Attributes of population served	X			
(e) & (5)(a) to (c) Mandatory reporting that includes: (a) legal definition of child abuse in ORS 418.257 and 419B.005 (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			
New Employee Orientation Residential (30 days) 419-470-0120	Yes	No	N/A	Corrective Actions/Comments

(1)(a) Discipline and behavior management including de-escalation, crisis prevention, positive behavior management, and disciplinary techniques that are non-punitive in nature	X			
(1)(b) Restraint and seclusion (if applicable)			X	
Crisis Intervention Training Standards and Certification 419-400-0160(4) (as applicable)	Yes	No	N/A	Corrective Actions/Comments
(a) Complete a minimum of 12 hours of initial training in person from a certified instructor, including but not limited to a minimum of six hours of training focused on positive behavior support, nonviolent crisis intervention and other methods of nonphysical intervention to support children in care during a crisis	X			
(d) Receive a certificate that states: (A) The dates during which the certification is current (B) The type of restraint which the individual is certified to perform if applicable (C) The type of training the individual is certified to conduct if applicable (D) Any special endorsements earned by the individual (E) The level of training (F) The name of the certified instructor who conducted the training and administered the assessment of proficiency.	X			
(e) A certification issued: (A) Must be personal to the individual certified by the training provider (B) May be valid for no more than two years with recertification	X			
Ongoing Training	Yes	No	N/A	Corrective Actions/Comments
419-470-0070(2)(b) Employees who handle food served to children have a valid food handler's card	X			
419-400-0200 (1) Employees transporting children have: current driver's license, insurance, trained in emergency procedures	X			

and behavior management, and training for 15+ passenger vans if applicable)				
419-470-0120 (2)(a) Environmental emergencies	X			
419-470-0120 (2)(b) Universal Precautions	X			
419-470-0120 (2)(c) Discipline and Behavior Management	X			
419-470-0120 (3) Staff providing direct care must maintain current CPR/First Aid certification	X			
419-470-0120 (4) Designated staff authorized to apply reasonable and prudent parent standard are trained in application of the standard	X			
419-400-0120(5) Mandatory reporting (annually) that includes: (a) legal definition of child abuse in ORS 418.257 and 419B.005 (b) legal responsibility to immediately report (c) legal responsibility to report is personal to the employee	X			
419-400-0160(4)(b) Receive continuing education (as applicable on crisis intervention training) from a certified instructor on an annual basis	X			
Comments:				

Children's Records	Yes	No	N/A	Corrective Actions/Comments
Health Services				
419-470-0090				
(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			
(2)(e) Documentation of age-appropriate instruction – pregnancy prevention, nutrition, prevention of HIV & AIDS, and prevention and treatment of sexually transmitted disease	X			
(4)(a) to (f) Medical exams (3 in first year of life, 2,4,6,9,14)	X			

Consents 419-470-0160(1)	Yes	No	N/A	Corrective Actions/Comments
(a) Provide routine and emergency medical care	X			
(b) Use the discipline and behavior management system	X			
(c) Use restraint or seclusion (if applicable). Must specify the reasons for the intervention and how staff are trained and supervised	X			
(d) Restrict contact with persons outside of the agency	X			
(e) Allow access as defined in 419-400-0230 & 0240	X			
(f) Impose a dress code	X			
(g) Apply the reasonable and prudent parent standard	X			
Disclosures 419-470-0160(2) Parent/guardian has acknowledged in writing:	Yes	No	N/A	Corrective Actions/Comments
(a) Information regarding personal or room searches and protocols for confiscation of contraband	X			
(b) Statement of Rights of Children and Parents/Guardians	X			
(c) Any policies and procedures upon request		X		Disclosures 419-470-0160(2) Parent/guardian has acknowledged in writing: (c) Any policies and procedures upon request The above required information was missing on the consent document.
Authorizations 419-470-0160(3)	Yes	No	N/A	Corrective Actions/Comments
(a) Disclose or exchange information with others	X			
(b) Child specific visitors	X			
(c) Visitation resources are pre-approved	X			
(d) Activity specific 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 419-400-0190(1) Summary sheet contains the following:	Yes	No	N/A	Corrective Actions/Comments
(a)The name, gender, date of birth, religious preference, and previous address	X			

(b) Name and location of previous and current school	X			
(c) Date of admission	X			
(d) Legal custody	X			
(e) 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> . (C) Other persons significant to child (D) Other professionals to be involved in service planning (if applicable)	X			
Service Planning 419-470-0170(2)	Yes	No	N/A	Corrective Actions/Comments
(b) Intake document is completed the date child accepted into care (emergency placement 48 hours)	X			
(d) Assessment is completed within 30 days and contains relevant historical info., current behavioral observations, identified need for services, and how agency will provide services	X			
(e) (A)&(B) Service plan within 60 days (parent, guardian and child actively involved). Describes how child's issues will be addressed, anticipated outcomes, and reviewed by child and guardian/parent.	X			
(e)(C) & (D) Service plan is reviewed quarterly and revised when information indicates other services should be provided	X			
Case Management 419-470-0170(3)	Yes	No	N/A	Corrective Actions/Comments
(a) Services are documented, progress toward achieving goals is tracked	X			
(b)-(d) discharge planning and instructions	X			
(f) Incident Reports	X			
Records Relating to Restraint & Involuntary Seclusion	Yes	No	N/A	Corrective Actions/Comments
419-400-0180(13)(e) Each child caring agency shall provide notice regarding how to access the quarterly reports to the parents or guardians of children in care in the program. The child caring agency shall provide the		X		Records Relating to Restraint & Involuntary Seclusion 419-400-0180(13)(e) Each child caring agency shall provide notice regarding how to access the quarterly reports to the parents or guardians of children in care in the program. The child caring agency shall provide the notice upon the child in care's admission and at least two times each year thereafter.

notice upon the child in care's admission and at least two times each year thereafter.				Youth files reviewed didn't contain documentation to verify that the above requirement had been met.
419-400-0190(1) Information provided to children in care relating to Restraint & Involuntary Seclusion		X		Records Relating to Restraint & Involuntary Seclusion 419-400-0190(1) Information provided to children in care relating to Restraint & Involuntary Seclusion Youth files reviewed didn't contain documentation to verify that the above requirement had been met.
Financial Records 419-470-0170(4)	Yes	No	N/A	Corrective Actions/Comments
Records contain date, amount, source, purpose, signatures	X			
Personal Possessions Records 419-470-0170 (5)	Yes	No	N/A	Corrective Actions/Comments
Individual written inventory of all personal possessions is maintained and updated as needed	X			
Records and Documentation 419-400-0140	Yes	No	N/A	Corrective Actions/Comments
(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 includes: Name Gender Birth date Names, addresses of parents or guardians Dates of admission Placement upon discharge	X			
Comments:				

***Supplemental information provided by the CCA as stated above (page 5).**

All revisions made to policies must be highlighted prior to sending to Licensing. Required Policy Revisions:

419-400-0090 Licensing Umbrella Rules: Children and Families Rights Policy and Grievance Procedures

(2) Grievance Procedures (a) A child-caring agency must enact and adhere to written procedures for the children in care and families the child-caring agency serves to submit a grievance. For an academic boarding school, this subsection only applies to grievances about health or safety issues. The child-caring agency must provide the procedures to each child in care and family. The procedures must include all of the following: (C) A procedure to follow, in the event the grievance is filed against the executive director, that ensures that the executive director does not make the final decision on the grievance (b) Grievances and complaints filed with the child-caring agency and all information obtained in their resolution must be maintained for a minimum of two years and provided to the Department upon

request(D) The name, address, and phone number of: (i) A Department licensing coordinator; and (ii) Any other governmental entities with oversight responsibilities(b) Grievances and complaints filed with the child-caring agency and all information obtained in their resolution must be maintained for a minimum of two years and provided to the Department upon request.

- The agency's Grievance Policy for Children and Families did not contain some of the required provisions.
 - The policy lacked information to state that the executive director will not make the final decision on the grievance if the grievance is about the executive director.
 - The policy must state the Licensing Coordinator's name, and contact information, as well as Carrie Wouda's name and contact info at the Oregon Health Authority.

419-400-0110 Licensing Umbrella Rules: Policies and Procedures (1) Transportation. If a child-caring agency transports children in care in a vehicle, the agency must have policies and procedures that address all of the following:(a) Driver requirements. (A) Each employee transporting a child in care in a motor vehicle must have a current driver license on record with the child-caring agency and must comply with applicable traffic laws when transporting children in care. (C) The child-caring agency must ensure that employees providing transportation are trained in emergency procedures, including behavior management if applicable, while in a vehicle.

- The above stated language must be added to the agency's policies.

419-400-0130 Licensing Umbrella Rules: Privacy (4) A person making a report of abuse as required in ORS 418.258 and 419B.010 may include references to otherwise confidential information for the sole purpose of making the report.

- The above required language must be added to the agency's Privacy Policy.

419-400-0150 Licensing Umbrella Rules: Discipline, Behavior Management & Training, and Suicide Prevention (Excluding Adoption Agencies) (1) A child-caring agency, except a child-caring agency licensed only to provide adoption services under OAR 419-420-0010 to 419-420-0160, must adopt and adhere to written policies and procedures on discipline, behavior management, and suicide prevention that meet all of the requirements of this rule. (b) The discipline and behavior management policies and procedures must prohibit the following: (K) Removing or limiting the use of a mobility aid or other assistive device for the purpose of controlling a child in care's behavior.

- The above required prohibition must be added to the agency's Behavior Management Policy.
 - The Behavior Management Policy must be revised to add verbiage, that at no time should a restraint be utilized on youth in the program. Notwithstanding policy to not use physical restraints, the policy should indicate that if a staff physically intervenes in an extreme circumstance, all reporting requirements, and timelines in OAR 419-400-0180 (12)(13) will be met. In addition, the policy must state who from the program will ensure reporting requirements are met and the required debrief meeting occurs in accordance with OAR 419-400-0180 (12)(d).

419-400-0200 Licensing Umbrella Rules: (4) Hazards (a) A child-caring agency must protect children in care it serves from guns, drugs, sharps, paint, hazardous materials, bio-hazardous materials, and other potentially harmful items. A child-caring agency must have a written policy that addresses potentially harmful materials that are in areas accessible to the children in care in the program or on the grounds of the program.

- ☐ The above stated language must be added to the agency's policies.

Licensing Coordinator's Signature: Holly Ivey Date: 02-17-2023

Manager Review: Jim Gil Date: 02-17-2023