



**Licensed Child Caring Agency Report (6 Month)
Secure Transportation Services Provider**

Licensee: Right Direction Crisis Intervention (RDCI)

Executive Director: Brian Shepherd

Board Chairperson: Brian Shepherd

Date of site visit: Online file review completed 2/24/2023

Licensing Coordinator: Todd Cooley

Other Regulatory or Accrediting Agencies: None

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 419-480-0010 to 419-480-0120, Secure Transportation Services Provider Rules. Personnel records were reviewed and compliance with required background checks was documented for employees in all programs.

Program Description(s): Right Direction Crisis Intervention is an independent company dedicated to providing the highest quality crisis intervention and transport services to families in need, specializing in interventions, transports and runaway location investigations.

Program type and services: Secure transportation services

Funding sources: Private Pay

Contracts and sources for referrals: Education Consultants

Use of seclusion or restraint: Trained in CPI with policies around use of restraints

Interviews, Observations:

Phone interviews were conducted with two of the parents involved with RDCI transports. Youth interviews were requested from these parents and one was granted and is currently being coordinated with the boarding school where the client is a resident and the second wanted their child to have more time to settle in as they had recently arrived at a new placement.

The first parent interviewed stated RDCI took an extremely hard experience and made it as easy as they possibly could. They stated RDCI engaged in a ton of prep work and really got into their son's overall nature, likes and dislikes. Upon discovering he had a huge fear of flying, RDCI coordinated to drive the client in order to eliminate this cause of anxiety. RDCI provided the parent with the backgrounds of both transport agents

and gave the parents references they could check as well. The parent stated RDCI was in constant communication with them. The transport agents spent about 40 minutes at the house with their son and didn't rush at all. Upon completion of the transport, they provided a summary report that included things such as conversations that involved their son's thoughts and feelings. The family was referred to RDCI by an Education Consultant, Ricky Becker, with Integrative Approach. The parent was very grateful for the service provided and would highly recommend to anyone needing secure transport for their child.

The second parent interviewed provided similar positive responses. They stated RDCI was really good and fantastic. They were professional, gentle and articulate. The parent stated they were so afraid their child might die from a drug overdose and were out of options. They said RDCI, "Were angels sent from heaven, and I am not even a religious person". The parent could not state enough how happy a company like RDCI exists. This parent also used the same Education Consultant, Ricky Becker, and said he was top notch.

When a youth becomes available for an interview it will be documented and the report amended as necessary.

3/1/2023 – Licensing was able to conduct a phone interview with a youth who had been a client of RDCI after receiving parent permission and coordinating with current placement. Youth was asked about their experience with secure transport, and they stated it was the best it could be given the situation. They said the staff were nice and respectful. They came around 9pm and introduced themselves to the client and explained what was happening and what was going to happen. Youth stated they were patted down prior to entering the vehicle, but at no other time were hands placed on them. Client stated staff were very cautious even though the client assured staff they had no intention of running away. They stopped for gas and food a few times during the trip which was a total of 14 hours driving. Client said it was actually kind of fun staying up all night driving and just chatting with them. Client said their experience was a 10 out of 10.

Observations: RDCI is the one of the first and is the only operational CCA licensed secure transport company. This first review is consistent with other "new" programs. RDCI has been in operation for many years, but this is the first time there has been governmental oversight and regulation. Management has been very receptive to input and has expedited requested changes to policies and paperwork throughout the licensing and review process. This is a unique subset of CCA licenses as there are no facilities to review and in the case of RDCI who rents their vehicles, no equipment to inspect. The filing is all electronic and appears to be organized and well kept. Some deficiencies were noted around the new employee orientation training and discussions have already been had on how to implement, train and document.

Grievances and complaints: None

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

Within 45 days of receipt of this report Right Direction Crisis Intervention 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 Todd Cooley, todd.cooley@odhs.oha.state.or.us

Exceptions: Minimum Board Requirement**Changes in License:** None

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		Exception on file
(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 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	
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 based on a child's needs, developmental level, and behavior.	X			
(3)(b)(C) Agency does not use chemical and mechanical restraint (excluding medically necessary devices/prescriptions)	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 419 division 400			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	
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	
Auto Insurance 419-480-0020(2)(a)(b)	Yes	No	N/A	Corrective Actions/Comments
Maintain general and automobile liability coverage for personal injury and death of at least \$250,000 per person per incident.	X			
Maintain general and automobile liability coverage for property damage and destruction of at least \$50,000 per incident.	X			
Service Agreements 419-480-0030 All agreements will, at a minimum, address the following:	Yes	No	N/A	Corrective Actions/Comments
(1) The fee charged.	X			
(2) A description of the services to be provided.	X			

(3) Information collected by the secure transportation services provider to ensure the safety, physical health, mental health, and well-being of the child in care including, but not limited to: (a) Any physical limitations (b) Any known allergies (c) All medications and administration schedule(s), both prescribed and over the counter (d) Any other needs as identified by the guardian.	X			
(4) A description of the mode(s) of transportation and route that will be taken in the course of service delivery.	X			
(5) A detailed inventory of personal belongings. This will include weather appropriate apparel.	X			
Staffing Ratios 419-480-0050	Yes	No	N/A	Corrective Actions/Comments
The secure transportation services provider must provide adequate supervision and protection to maintain the physical health, mental health, and well-being for any child in care it is serving.	X			
Umbrella Safety 419-400-0200	Yes	No	N/A	Corrective Actions/Comments
(1)(b)(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 vehicles operated by RDCI are rented and are not equipped with a fire extinguisher. The fire extinguisher requirement only applies to vehicles owned by the child caring agency.
(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			
Secure Transportation Services Safety 419-480-0100	Yes	No	N/A	Corrective Actions/Comments
(1) The secure transportation services provider must ensure a child in care uses a seat belt or age-appropriate safety seat when transported in a motorized vehicle	X			
(2) The secure transportation services provider must prohibit any smoking,	X			

aerosolizing, or vaporizing of an inhalant in the presence of a child in care.				
(3) The secure transportation services provider must have an emergency plan that provides instructions for response in the event of an emergency.	X			
Vehicle Requirements 419-480-0090	Yes	No	N/A	Corrective Actions/Comments
(1) Vehicle is clean and comfortable at all times.	X			
(2) The vehicle shall include, but is not limited to the following safety equipment: (a) Safety belts, or age and size appropriate safety seats, for all passengers (b) A first aid kit (c) A flashlight (d) Tire traction devices when appropriate (e) Disposable gloves.	X			
(3) Vehicles owned by a Secured Transportation Services provider must be in good operating condition and shall include, but is not limited to: (a) Side and rearview mirrors (b) A horn (c) Working turn signals, headlights, taillights, and windshield wipers.	X			
(4) Any aftermarket modifications made to a vehicle used to transport any child in care must be disclosed to the Department.	X			
(6) When a vehicle is used in the transportation of a child in care, the secure transportation services provider will ensure access to a roadside assistance provider.	X			
Medication 419-480-0120	Yes	No	N/A	Corrective Actions/Comments
(1) A secure transportation services provider must have and follow written policies on the storage, dispensing, and disposal of prescription and non-prescription medication.	X			
(2) A prescription, signed by a physician or qualified health professional, is required before any prescription medication is administered to, or self-administered by a child in care.	X			

(3) Before a secure transportation services provider permits a child in care to self-administer prescription medication, self-administration must be approved in writing by a physician, and closely monitored by the employee of the secure transportation services provider.	X			
(4) Medication storage. All prescription and non-prescription medications must be stored in a locked container and kept in a manner that makes them inaccessible to the child in care.	X			
(5) Medication disposal. Medications must be disposed of in a manner that ensures that they cannot be retrieved, in accordance with all applicable state and federal law.	X			
(6) A written record of all medication disposals must be maintained and must include the following: (a) A description of the prescribed medication and the amount disposed. (b) The child in care for whom the medication was prescribed. (c) The reason for disposal. (d) The method of disposal. (e) The name of the person disposing the medication, and the initials of an adult witness.			X	
(7) Medication records. A written record must be kept for each child in care listing all medications, both prescription and over-the-counter, that is administered. The record must include the following: (a) The name of the child in care. (b) A description of the medication, instructions for use, and the recommended dosage. (c) Dates and times med is administered. (d) A record of missed dosages. (e) Medication dropped or disposed of. (f) Method of administration for each medication. (g) Identification of person administering the medication.		X		RDCI utilizes the transfer form to document the administration of medication. The current form does not provide the following information: • Method of administration not listed • Person administering not identified • Possible adverse reactions not available Corrective Action: Update medication administration documentation to meet rule requirements.

(h) Any possible adverse reactions to the medication.				
Comments: RDCI has already submitted an updated transfer form with a more detailed medication administration section containing information required by rule.				

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		There was no documentation of this training Corrective Action: Develop process to consistently train and document completion of training. All new employee orientation training will be completed and documented in the files for all employee who are involved in Oregon transports within 30 days and returned to licensing for review.
(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		There was no documentation of this training Corrective Action: Develop process to consistently train and document completion of training. All new employee orientation training will be completed and documented in the files for all employee who are involved in Oregon transports within 30 days and returned to licensing for review.

(f) Privacy laws		X		There was no documentation of this training Corrective Action: Develop process to consistently train and document completion of training. All new employee orientation training will be completed and documented in the files for all employee who are involved in Oregon transports within 30 days and returned to licensing for review.
(g) Emergency procedures	X			
New Employee Orientation – Secure Transport 419-480-0040	Yes	No	N/A	Corrective Actions/Comments
(1) Employees, contractors, agents, and volunteers who transport a child in care shall have a valid driver's license. The license must be the class of license, with any required endorsements, that permits the employee or volunteer to legally operate the vehicle or vehicles used for transporting children.	X			
(4)(a) Job duties and responsibilities	X			
(4)(c) A nationally recognized safe driving training course within 90 days of the date of hire and at least every three years thereafter	X			
(4)(d) First aid and cardiopulmonary resuscitation sufficient to retain a current certification	X			
(4)(e) Universal precautions (infection control guidelines designed to protect workers and clients from exposure to diseases spread by blood and certain body fluids)	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	X			

(F) The name of the certified instructor who conducted the training and administered the assessment of proficiency.				
(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 419-480-0040	Yes	No	N/A	Corrective Actions/Comments
(c) A nationally recognized safe driving training course every three years after initial training			X	
(d) First aid and cardiopulmonary resuscitation sufficient to retain a current certification			X	
(e) Universal precautions (infection control guidelines designed to protect workers and clients from exposure to diseases spread by blood and certain body fluids)			X	
(f) Mandatory abuse reporting, approved by the Department, consistent with OAR 413-215-0061.			X	
Comments:				

Children's Records 419-480-0060	Yes	No	N/A	Corrective Actions/Comments
For each child in care of a secure transportation services provider, the secure transportation services provider must maintain a record that includes all of the following information:				
(1) The name, gender, and date of birth of the child in care	X			
(2) The date of admission to the program	X			
(3) The name, address, and telephone number of: (a) The child in care's parent(s), or (b) The child in care's legal guardian, if different than the parent(s), and a copy of the document that provides for the legal guardian's authority over the child in care.	X			
(4) Incident Reporting. A written description of any injury, accident, or unusual incident involving a child in care must be placed in the individual child in care's record			X	
(5) An assessment must be completed prior to transportation services. The assessment must include relevant medical and behavioral needs of the child in care.	X			

(6) A service plan describing how the secure transportation service provider will meet the child in care's needs identified in the assessment during the transport.	X			
Consents 419-480-0070(1)	Yes	No	N/A	Corrective Actions/Comments
(a) To provide secure transportation or escort services to the child in care.	X			
(b) To allow access to a child in care as required by ORS 418.305		X		No documentation to allow access Corrective Action: Update consents
(c) To use the behavior management systems utilized by the secure transportation services provider.		X		No documentation to allow use of CPI Corrective Action: Update consents
(d) To use restraint or seclusion in the management of the child in care. The consent must specify the reasons such interventions are used by the secure transportation services provider and how the employees of the secure transportation services provider are trained and supervised in the use of restraint or seclusion		X		There was a consent to utilize restraint, but the consent did not detail specific reasons when the interventions would be used and how employees were trained/supervised in the use of restraints. Corrective Action: Update consents
Disclosures 419-480-0070	Yes	No	N/A	Corrective Actions/Comments
(2) At admission, the secure transportation services provider must ensure that each parent or legal guardian of the child in care receives and acknowledges in writing the secure transportation services provider will make any written policy or procedure pertaining to program services available for review by the child in care and the child's parent or legal guardian, upon request.		X		No documentation providing parent or guardian with this information. Corrective Action: Update disclosures
Authorizations 419-480-0070	Yes	No	N/A	Corrective Actions/Comments
Written authorization to obtain confidential health information must be specific and have an expiration date. Information may only be requested if it directly pertains to the services being provided by the secure transportation services provider.		X		No authorization to obtain relevant health information Corrective Action: Update authorizations
Records Relating to Restraint & Involuntary Seclusion 419-400-0180 (12) Records	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 notice upon the child in care's admission and at least two times each year thereafter.		X		No information provided on how to obtain/view quarterly restraint reports Corrective Action: Update notice to parents
419-400-0190(1) Information provided to children in care relating to Restraint & Involuntary Seclusion	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: <i>RDCI has already updated two separate forms which address all the consent, disclosures, and authorizations required by rule. They have also added information on how to access quarterly restraint reports which is provided to all parents/legal guardians</i>				

Licensing Coordinator's Signature: Todd Cooley Date: 3-1-2023

Manager Review:  Gilt Date: 3-1-2023