

# Exhibit A



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF PUBLIC WELFARE

**ORDER**

And now this 25<sup>th</sup> day of March 2019, pursuant to 55 Pa. Code § 20.37, the Commonwealth of Pennsylvania, Department of Human Services, hereby determines that the conditions existing at fourteen (14) licensed facilities located at:

Glen Mills Schools  
185 Glen Mills Road  
Glen Mills, PA 19342

as described in Attachment A, constitute gross incompetence, negligence and misconduct in operating a facility, including mistreatment and abuse of clients, likely to constitute immediate and serious danger to the life or health of the children in care.

Accordingly, it is hereby ordered that the residents be relocated from the child residential facility as promptly as can be safely accomplished.

Attachments:

Attachment A – Findings

A handwritten signature in cursive script, reading "Cathy A. Utz", written over a horizontal line.

Cathy A. Utz  
Deputy Secretary

**FINDINGS****FACILITY AND LICENSE NUMBER:**

<b>BUCHANAN HALL I UPPER</b>	113050
<b>BUCHANAN HALL II LOWER</b>	113060
<b>CHESTER ARTHUR HALL</b>	136000
<b>HAYES HALL</b>	112880
<b>JACKSON POLK HALL</b>	112980
<b>JEFFERSON FILLMORE HALL</b>	112960
<b>JOHNSON HALL I</b>	112890
<b>JOHNSON HALL II</b>	113010
<b>LINCOLN HALL</b>	112920
<b>MADISON HALL</b>	112940
<b>MCKINLEY HALL</b>	137300
<b>TAYLOR HALL</b>	112860
<b>TYLER HALL</b>	113020
<b>VAN BUREN HALL</b>	113030

**LEGAL ENTITY:** Glen Mills Schools  
 185 Glen Mills Road  
 Glen Mills, PA 19342

The Department of Human Services (“department”), Southeast Region Office of Children, Youth and Families (“OCYF”) staff commenced an investigation in January 2019 at the above named licensed facilities of Glen Mills School (“Glen Mills”), located at 185 Glen Mills Road, Glen Mills, PA 19342. The investigation involves allegations of abuse sustained by children while under the care of Glen Mills staff.

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Glenn Mills Schools - Attachment A

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Additionally, in June of 2018, the department's OCYF staff initiated a targeted site visit focused solely on conducting resident interviews in an effort to assess accusations that an underlying culture of abuse existed within the facility. This visit followed a series of anonymous written complaints alleging staff were mistreating and being aggressive with residents. One allegation claimed staff in one of the facilities cut residents' hair as a form of punishment. The interviews focused on the use of restraints by staff, the residents' relationships with staff, how residents are helped by staff to reach their goals and how safe residents feel at Glen Mills.

As a result of the ongoing investigations, OCYF representatives verified the following violations of the department's regulations for child residential and day treatment facilities, pursuant to 55 Pa. Code Chapter 3800:

- 3800.32(b), relating to Specific Rights. An investigation commencing on March 13, 2019 determined that a child was choked by staff, then he was pushed against a wall, causing his head to hit the wall.
- 3800.32(b), relating to Specific Rights. An investigation commencing on March 6, 2019 determined that staff failed to intervene to protect a child from another resident resulting in the child suffering a broken jaw.
- 3800.32(b), relating to Specific Rights. An investigation commencing on February 15, 2019 determined that a child was assaulted by a staff person causing an injury to his eye. The child was then coerced into saying that his injury was a result of playing basketball.
- 3800.32(b), relating to Specific Rights. An investigation commencing on March 13, 2019 determined that a child was choked by three staff and then slammed to the floor, causing the child to hurt his neck. The child expressed that he suffered migraines as a result of the incident.
- 3800.32(b), relating to Specific Rights. An investigation commencing on March 2, 2019 determined that a staff person punched a child in the chest for not listening to the staff person.
- 3800.32(b), relating to Specific Rights. An investigation commencing on February 22, 2019 determined that a staff person punched a child in the face, causing a laceration to his lip.
- 3800.32(b), relating to Specific Rights. An investigation commencing on February 22, 2019 determined that a child was punched by staff in the chest two to three times, and once in the forehead.



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- 3800.32(c), relating to Specific Rights. An investigation commencing on March 13, 2019 determined that a child was choked by staff, then he was pushed against a wall, causing his head to hit the wall.
- 3800.32(c), relating to Specific Rights. An investigation commencing on February 15, 2019 determined that a child was assaulted by a staff person causing an injury to his eye. The child was then coerced into saying that his injury was a result of playing basketball.
- 3800.32(c), related to Specific Rights. A child disclosed on March 13, 2019 that he was asked to sign a document for court stating that he wished to remain at Glen Mills if he could not be sent home.
- 3800.32(c), relating to Specific Rights. An investigation commencing on March 13, 2019 determined that a child was choked by three staff and then slammed to the floor, causing the child to hurt his neck. The child expressed that he suffered migraines as a result of the incident.
- 3800.32(c), relating to Specific Rights. An investigation commencing on March 2, 2019 determined that a staff person punched a child in the chest for not listening to the staff person.
- 3800.32(c), relating to Specific Rights. An investigation commencing on February 22, 2019 determined that a staff person punched a child in the face, causing a laceration to his lip.
- 3800.32(c), relating to Specific Rights. An investigation commencing on February 22, 2019 determined that a child was punched by staff in the chest two to three times, and once in the forehead.
- 3800.32(k), relating to Specific Rights. An investigation commencing on March 13, 2019 determined that a child was choked by three staff and then slammed to the floor, causing the child to hurt his neck. The child expressed that he suffered migraines as a result of the incident.
- 3800.32(n), relating to Specific Rights. An investigation commencing on March 13, 2019 determined that a child was choked by staff, then he was pushed against a wall, causing his head to hit the wall.
- 3800.32(n), relating to Specific Rights. An investigation commencing on February 15, 2019 determined that a child was assaulted by a staff person causing an injury to his eye. The child was then coerced into saying that his injury was a result of playing basketball.

- 3800.32(n), relating to Specific Rights. An investigation commencing on March 13, 2019 determined that a child was choked by three staff and then slammed to the floor, causing the child to hurt his neck. The child expressed that he suffered migraines as a result of the incident.
- 3800.32(n), relating to Specific Rights. An investigation commencing on March 2, 2019 determined that a staff person punched a child in the chest for not listening to the staff person.
- 3800.32(n), relating to Specific Rights. An investigation commencing on February 22, 2019 determined that a staff person punched a child in the face, causing a laceration to his lip.
- 3800.32(n), relating to Specific Rights. An investigation commencing on February 22, 2019 determined that a child was punched by staff in the chest two to three times, and once in the forehead.

Based on interviews conducted with youth currently and formally placed at Glen Mills, the department determined that residents have been and continue to be subjected to physical harm as a result of being slapped, punched, and stricken by staff. In addition, youth are encouraged by staff to engage in physical altercations with peers that has resulted in injuries to youth and staff have failed to intervene in these altercations. Moreover, staff at Glen Mills have failed to seek necessary medical treatment for youth as a result of injuries sustained during altercations with both staff and their peers.

Glen Mills operates under a culture of intimidation as evidenced by a request that youth from Philadelphia County sign a facility developed document which was to be presented during an upcoming court hearing which stated that the youth wanted to remain at Glen Mills. Youth were informed that failure to sign the document would result in their court commitment starting over which would result in their remaining in placement for an extended period of time.

Information gathered during interviews of former and current youth placed at Glen Mills verifies that a culture of intimidation and coercion is pervasive at Glen Mills and that youth were told to lie about the care they received and the physical mistreatment they endured while placed at Glen Mills.

These findings verify that Glen Mills failed to protect the youth entrusted to its care, placed youth at risk of serious physical injury, permitted youth to sustain physical injuries by their acts and failure to act and Glen Mills engages in a culture that instills fear in youth through coercion and

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intimidation. As a result, we find that youth placed at Glen Mills are at imminent risk and their safety is in jeopardy.

Aside from the aforementioned allegations, the department has determined there is a correlation between these allegations and previously issued violations against Glen Mills' facilities. This correlation demonstrates that abuse and mistreatment of children in care continues to date.

Between January 19, 2019 and March 4, 2019, a representative of the department conducted a complaint inspection at Glen Mills' Madison Hall. As a result of the complaint inspection, the department confirmed violation of 55 Pa. Code Chapter 3800:

- 3800.32(b), relating to Specific rights. During the course of a Child Protective Services ("CPS") investigation, the investigator determined that a physical altercation occurred resulting in injuries to the child's face. As a result, the child's rights were violated while under the care of Glen Mills.

On October 16, 2018, a representative of the department conducted a complaint inspection at Glen Mills' Hayes Hall. As a result of the complaint inspection, the department confirmed violation of 55 Pa. Code Chapter 3800:

- 3800.55(a), relating to Child Care Worker. During the course of a complaint investigation, it was determined that on October 9, 2018 during the 3:30 p.m. to 11:30 p.m. shift there were five child care workers on the unit with 49 students. On October 9, 2018 an incident occurred where at least one student entered another student's room and took money from the student. The incident occurred at approximately 8:00 p.m.

Additionally, between July 19, 2018 and September 12, 2018, a representative of the department conducted a complaint inspection at Glen Mills' Johnson Hall II where an incident of suspected child abuse occurred. As a result of the complaint inspection, the department confirmed the following violations of 55 Pa. Code Chapter 3800:

- 3800.1. During the course of a CPS investigation a failure to protect the health, safety and well-being of youth occurred while under Glen Mills' care. During the course of the investigation, it was determined that a youth in care was physically abused by the actions of Child Care Residential Staff on July 19, 2018. The alleged abuse occurred in multiple locations in Johnson Hall II. Further, the investigation revealed that several staff observed the incidents and failed to stop the mistreatment and abuse for an unreasonable period of time while in close proximity to the two separate incidents. Video surveillance of the



incident demonstrates that no action or physical threat by the youth occurred to precipitate the need for physical intervention. The investigation also found that all youth who were observing the abuse appeared to watch as if it was normal behavior in the facility as they appeared to sit emotionless.

- 3800.15(a), relating to Child Abuse. In the course of the investigation, it was determined that staff failed to report a separate incident of abuse against a youth in care at Glen Mills. The incident, in a separate location in the facility was not reported until days later even when Child Care Residential Staff in close proximity observed the incident. These staff are Mandated Reporters. The initial incident of alleged mistreatment which happened downstairs in the facility was the only incident originally reported, whereas the second incident was reported days later during video replay.
- 3800.32(b), relating to Specific Rights. In the course of the investigation, it was determined that the youth was found to be abused, mistreated, harassed, threatened, and subjected to corporal punishment by multiple Child Care Residential staff during the first and second incidents when he was slapped, slammed on the floor, and punched. Video surveillance shows other staff observing the incident, but failing to intervene to protect the child.
- 3800.32(c), relating to Specific Rights. In the course of the investigation, it was determined that the youth in the care of the Glen Mills was treated without any level of respect and dignity during the two separate incidents with staff.
- 3800.32(l), relating to Specific Rights. In the course of the investigation, it was determined that all youth who observed were denied their right to rehabilitation and treatment by observing some of the abusive behavior by Child Care Residential staff during the initial incident.
- 3800.32(n), relating to Specific Rights. In the course of the investigation, it was determined that the youth was subjected to harassment, unreasonable restraint, unusual and an extreme form of discipline by more than one Child Care Residential staff while other residents and staff observed.
- 3800.53(b), relating to Director. In the course of the investigation, it was determined that the Director, the person responsible for the administration and management of the facility failed to ensure the safety and protection of youth placed at the facility and ensure that staff adhered to policies and procedures in compliance with Chapter 3800.
- 3800.148(b), relating to Health and Behavioral Health Services. In the course of the investigation, it was determined that Glen Mills failed to provide or delayed providing the appropriate medical treatment of the child's injuries which were sustained at the hands of Glen Mills staff. After he was discharged from Glen Mills, the child required additional treatment when he reported having a head injury and back pain.

- 3800.202(a), relating to Appropriate Use of Restrictive Procedures. In the course of the investigation, it was determined that the staff used restrictive procedures in a punitive manner when the child was slammed to the floor and restrained.
- 3800.202(a), relating to Appropriate Use of Restrictive Procedures. In the course of the investigation, it was determined that the staff used restrictive procedures when there was no threat of the child injuring himself or others.
- 3800.202(c)(1), (2), relating to Appropriate Use of Restrictive Procedures. In the course of the investigation, it was determined that the staff failed to use any de-escalation technique or less intrusive technique as the child was speaking in a group setting and not acting out physically or aggressively.
- 3800.211(b), relating to Manual Restraints. In the course of the investigation, it was determined that the staff applied pressure to the child's airway, choking the child in a manner which restricted his breathing.

Further, on June 27, 2018, a representative of the department conducted a complaint inspection at Glen Mills' Hayes Hall. As a result of the complaint inspection, the department confirmed violations of 55 Pa. Code Chapter 3800:

- 3800.32(n), relating to Specific Rights. In the course of the investigation, it was determined that one staff member at Glen Mills (PM Senior Counselor) inappropriately gave 38 residents in Hayes Hall haircuts against their wishes after two students in Hayes Hall were absent without permission on Saturday June 23, 2018. Staff also removed the sofa cushions in Hayes Hall and forced the students to sit either on the ground or sofa without the cushions as punishment.
- 3800.33(b), relating to Prohibition Against Deprivation of Rights. In the course of the investigation, it was determined that 38 student's rights were used as a punishment in Hayes Hall. One staff member at Glen Mills gave 38 students haircuts because the students' peers were absent without permission. The investigators believe the haircuts occurred because the 38 students would not give information on the two students who were absent without permission. The haircuts were a form of punishment.

On June 8, 2017, a representative of the department conducted a complaint inspection as a result of suspected child abuse at Glen Mills' Tyler Hall Facility where a child received a broken jaw. As a result of the complaint inspection, the department confirmed violations of 55 Pa. Code Chapter 3800:

- 3800.15, relating to Child Abuse. In the course of the investigation, it was determined that two staff failed to report the allegations of abuse. After the investigation concluded, the



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department obtained information that a senior staff person of Glen Mills was made aware of the incident on June 8, 2017 where upon Glen Mills staff asked for guidance on whether to file a report to ChildLine. The ChildLine Report was not made until the following day.

- 3800.32(b), relating to Specific Rights. In the course of the investigation, it was determined that the child sustained serious bodily injury that resulted from a physical assault by two staff. After the investigation concluded, the department obtained information that a senior staff person of Glen Mills was made aware of the incident on June 8, 2017 and advised staff to obtain ice for the child.
- 3800.32(c), relating to Specific Rights. In the course of the investigation it was revealed that the youth on the unit were required to sit on the floor in an uncomfortable position for over 60 minutes as punishment for wrongdoing.
- 3800.32(k), relating to Specific Rights. In the course of the investigation, it was determined that the child sustained serious bodily injury that resulted from a physical assault by two staff and that staff failed to seek immediate medical treatment. After the investigation concluded, the department obtained information that a senior staff person of Glen Mills was made aware of the incident on June 8, 2017 and advised staff to obtain ice for the child. It was learned the following day that the child suffered a broken jaw as a result of the incident when he finally was taken to medical staff.
- 3800.32(n), relating to Specific Rights. In the course of the investigation it was revealed that the youth on the unit were required to sit on the floor in an uncomfortable position for over 60 minutes as punishment for wrongdoing.

The ongoing failure to protect the safety of children, ongoing failure to immediately report suspected abuse, failure to provide proper medical attention and repeated pattern of violations described above constitute gross incompetence, negligence and misconduct in operating a facility, including mistreatment and abuse of children, likely to constitute immediate and serious danger to the life or health of the children in care pursuant to 55 Pa. Code § 20.37.

If you disagree with the department's decision, you have a right to appeal through a hearing before the Bureau of Hearings and Appeals, in accordance with 1 Pa. Code Part II, Chpt. 31 - 35 (General Rules of Administrative Practice and Procedure). Your appeal must indicate the reasons for the appeal, and you must be as specific as possible regarding your areas of disagreement with the department's decision. If you decide to appeal, a written request for an appeal must be received within ten (10) days of the date of the Order by:



Glenn Mills Schools - Attachment A

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Raheemah Shamsid-Deen Hampton  
Southeast Regional Office of Children, Youth and Families  
Pennsylvania Department of Human Services  
801 Market Street, Suite 6112  
Philadelphia, Pennsylvania 19107

This decision is final 11 days from the date of the Order, or if you decide to appeal, upon issuance of a decision by the Bureau of Hearings and Appeal.



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF PUBLIC WELFARE

March 25, 2019

Mrs. Carolyn Seagraves, 2nd Vice President  
The Glen Mills Schools  
185 Glen Mills Road  
Glen Mills, Pennsylvania 19342

RE: Glen Mills Schools – 14 Licensed Facilities  
185 Glen Mills Road  
Glen Mills, PA 19342

Dear Mrs. Seagraves:

Please be advised that as a result of the Department of Human Services' (department) investigations between December 2018 and March 19, 2019, the department has made the decision to issue an Emergency Removal Order requiring that all residents at Glen Mills Schools' Licensed Facilities be removed.

The department's decision to take this action is outlined in the attached documentation and should be carefully reviewed as it is a matter of urgent notice such that the removal and relocation of residents from the child residential facilities be completed in a safe, timely and orderly fashion.

Sincerely,

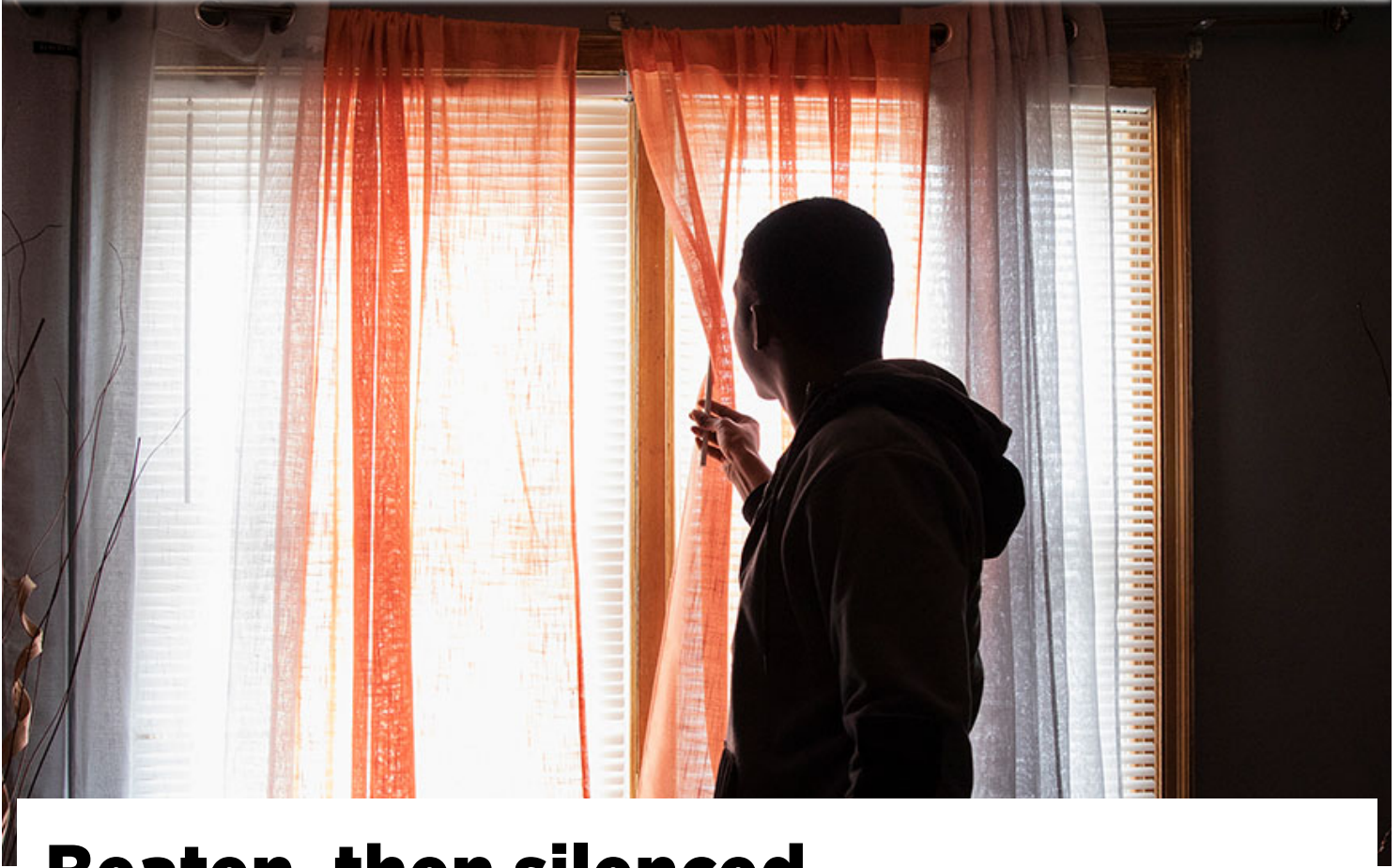
A handwritten signature in black ink, appearing to read "Cathy A. Utz".

Cathy A. Utz  
Deputy Secretary

Enclosure:  
Order for Emergency Relocation

c: Christopher Spriggs, Assistant Executive Director  
Raheemah Shamsid-Deen Hampton

# Exhibit B



# Beaten, then silenced

At the oldest U.S. reform school for boys, leaders of the prestigious Glen Mills Schools in Pennsylvania have hidden a long history of violence.

by [Lisa Gartner](#), Updated: February 20, 2019



The drive from Philadelphia winds southwest on the interstate, the city blocks giving way to wooded hills, the clock tower at the Glen Mills Schools finally coming into view. Every week, the mother drove the hour to visit her son at the school for delinquent boys.

Founded in 1826, Glen Mills is the oldest existing school of its kind in the country, with a reputation akin to the Harvard of reform schools. Boys are sent to the Delaware County campus from California, Texas, New York, and Ohio, and its top-tier athletic program yields NFL recruits. With its redbrick buildings and neatly trimmed quad, Glen Mills looks more like an elite prep school than a program for court-ordered boys.





DAVID SWANSON / STAFF PHOTOGRAPHER

Founded in 1826 as the Philadelphia House of Refuge, Glen Mills is the oldest school for delinquent boys in the country, set on nearly 800 acres of rolling hills in Delaware County.

But visiting her son one day in 2017, the boy's mother immediately knew something was wrong. His eyes were red and unfocused. He seemed dazed and had an ugly knot on the back of his head. The teenager insisted everything was fine.

"Don't lie to me," she said. He reluctantly told her: A Glen Mills counselor had picked him up and thrown him on his head, knocking him unconscious for several minutes. Another student had had to shake the teenager awake. The counselor was punishing him, the 16-year-old told his mother, for mouthing off.

>>**UPDATE:** *More than 80 boys to leave Glen Mills after Inquirer investigation of abuse*

She began to scream at every staffer she could find. Their response, she says, was that they could report the abuse to the state Department of Human Services — but if they did, her son would likely go to a less desirable placement than Glen Mills, one where he could no longer play sports. "They basically gave me an ultimatum," she says. "It was 'Do you want to tell, or do you want to throw it under the rug?'"

ADVERTISEMENT

Serious violence is both an everyday occurrence and an open secret at Glen Mills, and has been for decades, an Inquirer investigation has found. Internal documents, court records, incident reports, and more than 40 interviews with students, staff, and others show top leaders turn a blind eye to the beatings and insulate themselves from reports while failing to properly vet or train the school's counselors.

When students and their families try to report these attacks, the Inquirer found, Glen Mills staff uses the school's prestige as a weapon: They say Glen Mills is as good as it gets, and that if students complain, they'll be shipped off to a state-run facility crowded with boys who are mentally ill or have committed sex offenses.

To keep teens quiet, counselors and supervisors threaten the boys with longer sentences, claiming that if they went to another placement, their time would restart. Other Glen Mills staffers have hidden students until their bruises disappear.

"I've seen people thrown through doors, like it was a movie."

James Johnson, former Glen Mills student and counselor

"There are kids who can't come home because they are getting abused," said James Johnson, a former Glen Mills student who went on to become a counselor — then quit in 2015 over what was happening to boys. "I've seen people thrown through doors, like it was a movie."



JULIA RENDLEMAN

James Johnson, a former Glen Mills student turned counselor, says he quit in 2015 after his colleagues beat a boy to the point that his eye was nearly out of the socket. Johnson said the counselors confined the boy to his room until his injuries healed.

Over the course of several weeks, Glen Mills executive director Randy Ireson repeatedly declined to be interviewed for this story through a spokesperson at Brian Communications. (The public-relations firm is owned by Brian Tierney, who is a board member of the Inquirer's parent company, Philadelphia Media Network.)

Nevertheless, the newspaper, as a courtesy, provided Ireson with a comprehensive memo disclosing the story's findings on Feb. 11. On Feb. 15, [Glen Mills announced](#) the formation of a special task force composed of students, parents, staff, and child protection experts to conduct "an in-depth review into reports of misconduct" and "identify areas of opportunity for change."

"We have a responsibility to provide the highest quality services to at-risk youth who we serve," said Ireson in the news release. "We have asked for and expect a frank and candid assessment."



In addition, Ireson and his staff recently provided Philadelphia's Department of Human Services with a "corrective action plan" promising sweeping changes to everything from hiring practices and staff training to school culture and student grievance procedures.



ALEJANDRO A. ALVAREZ

Randy Ireson became the executive director of the Glen Mills Schools in 2013. The former college football player started as a counselor in 1979.

But local officials, after reading an earlier version of this story online Wednesday, said these promises weren't enough. Philadelphia will remove its 51 boys currently at Glen Mills, DHS spokesperson Heather Keafer told the Inquirer.

The process of moving the boys to other facilities will take a few weeks, as each child's case has to be reviewed individually by the court, "something that's done with much thought and consideration," Keafer said.

Councilmember Kenyatta Johnson said Wednesday that Glen Mills needs a complete overhaul of leadership; Councilmember Helen Gym called for an immediate independent investigation, "specifically around the evidence of potential abuse, coverup, witness intimidation, and what criminal and civil laws may have been broken."

Although a privately run nonprofit, Glen Mills receives taxpayer money, including a tuition of \$52,000 per year for each boy from Philadelphia. In fiscal 2017, Ireson **received \$336,000** in total compensation from the school, which has annual revenues of around \$40 million.

State law allows counselors at residential facilities to use approved “restraint techniques” to calm a child who is an immediate danger to himself or others.

But the experiences of 21 current and former students and counselors, examined by the Inquirer, show that counselors throw punches and break boys’ bones to punish them for breaking school rules. One boy said he was beaten and choked for running away. Another student suffered a broken jaw over a joke about a counselor’s sister.

The U.S. Department of Justice has “[an ongoing law enforcement proceeding](#)” at Glen Mills Schools, according to an October letter from the department’s Civil Rights Division.

#### RELATED STORIES

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- **Glen Mills hit with federal lawsuit by former students alleging abuse**
- **State orders ‘emergency removal’ of remaining boys at Glen Mills Schools after abuse revelations**
- **Pennsylvania inspector general launches investigation on oversight of Glen Mills**

In the school visitation room that day, the boy’s mother was afraid that what the counselors told her was true — if she reported the beating, as the school had failed to do, her son might end up somewhere worse. She said nothing. (The Inquirer agreed not to name the mother and son because he is still at Glen Mills.)

She went to see him a few months later. The boy pulled off his sweatshirt. His arms were black with bruises. The skin on his back was missing in patches.

More violence, he explained, from his counselors at Glen Mills.

## A hidden history

Glen Mills Schools has been promising to stop beating boys for at least two decades.

The school as it exists today starts with C.D. Ferrainola, described in news reports as “hot-tempered” and “cigar-chomping.” Ferrainola became the director of Glen Mills in 1975 and stayed put through 2007. Originally named the Philadelphia House of Refuge, the modest school of fewer than 100 boys grew in size and reputation under his watch.

Ferrainola’s hallmark: a peer-pressure model, in which boys informed on one another. Any failure to do so would make the boy just as guilty as the one doing wrong. To this day, reporting on their fellow classmates earns students “status,” allowing them to move through campus without adult supervision and enjoy privileges like home passes and the chance to compete on sports teams.

**ST. PETERSBURG TIMES**

C.D. Ferrainola, executive director from 1975 through 2007, built Glen Mills into an athletics powerhouse with booming enrollment. Records show he tried to keep state police from interviewing students about abuse complaints at the school.

Neat lines of well-behaved boys charmed the delegations from Florida, Colorado, and Rhode Island that toured Glen Mills in the 1990s. “I can’t wait to get back to Miami so that I can try to convince Dade County to adopt this program so that we might save a whole generation of children,” said one school board member.

Glen Mills’ student body swelled to more than 1,000 as boys from all over the country, and even western and central Europe, began to enroll. They were diminutive next to the towering power-lifters and ex-quarterbacks with whom Ferrainola staffed Glen Mills. He said he didn’t care much about who majored in what in college; he liked to belittle social workers.

About 85 percent of the counselors he hired were former athletes. Lessons in hard work and teamwork, Ferrainola said, were more useful than counseling or family outreach.

Randy Ireson, the current executive director of Glen Mills, was an early Ferrainola hire. He started as a counselor in 1979, the same year he graduated from West Chester University, where he was a star defensive tackle on its football team.

Instead of social services, Glen Mills invested in campus athletics. Ferrainola built state-of-the-art facilities and stadiums; in 1999, he broke ground on an 18-hole public golf course next to Glen Mills, saying it would provide students with workforce-training opportunities, while profits went to college scholarships.





DAVID SWANSON / STAFF PHOTOGRAPHER  
A green at the Golf Course at Glen Mills.

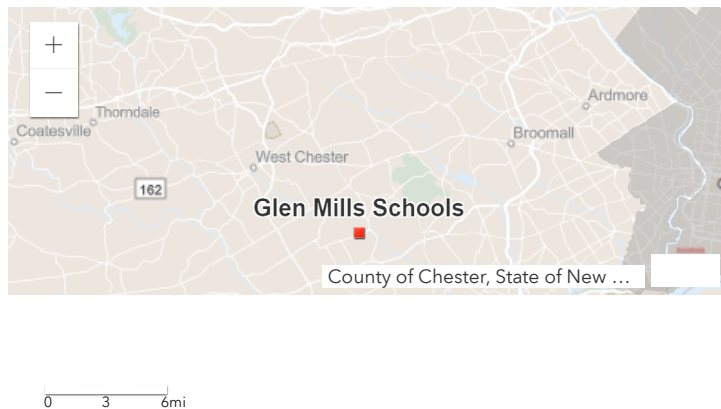
“You know what you have here?” Ferrainola once boasted, waving his cigar. “You have a great prep school for the kids of rich parents.”

Officials from Florida to Germany began making plans to build their own campuses based on the Glen Mills model, and locally, applause for the school grew deafening.

But the Inquirer found a hidden history of abuse.

In 1996, as Florida officials studied the campus, a teenager from Miami let slip that a 6-foot-4 Glen Mills counselor had grabbed him by the shirt and slammed him on a pool table. His offense? Walking into the room without acknowledging the staffer. The next year, Chicago pulled its boys out of Glen Mills after two said they had been beaten by counselors.

Click on the map for more information.



Ferrainola dismissed these complaints as lies from disgruntled former students. But a tense face-off from 2000 shows how Glen Mills tried to hide abuse at all costs.

State police officers, along with agents of the state department that oversaw Glen Mills, came to interview a child over suspected abuse on Feb. 11, 2000. State records say the boy had a chipped tooth and chest bruising at the hands of two staffers. The boy had asked two other Glen Mills employees to report the violence in his unit's log book, and for medical and dental care. No report was made. No medical attention was given.

Glen Mills staffers [repeatedly tried to block access to the boy](#), even when warned they were obstructing a police investigation, state records say. After police put the boy into a cruiser, Ferrainola and several other Glen Mills staffers leaned into it to yell at the police and the child. One officer was so frightened for the safety of the boy that he took him to the state police barracks, believing he'd be better off there than at Glen Mills.

When state police returned the next month to interview five more boys, Ferrainola and the school's lawyer, Guy Vilim, were present as Glen Mills staff physically placed themselves between a child and an officer to prevent an interview.

But the state persisted in its case, and eight boys ultimately told investigators they were kicked, punched, "chopped in the throat," slapped, pushed, or slammed into walls by 18 staffers. They said Glen Mills counselors supervised their phone calls to keep them from telling their parents, or threatened them with worse placements and longer sentences.

The state agency that licenses and oversees these schools demanded reforms. Glen Mills submitted a corrective action plan, promising to retrain its counselors on proper restraint techniques, to report all complaints of abuse to the state within 24 hours, and to allow children unsupervised phone calls. School leaders pledged to notify all counselors in writing that there could be no retaliation against a boy who reported abuse.

The state was satisfied and, by the end of 2000, Glen Mills was back in good standing. Ferrainola died in 2011. For a long time, it appeared there was nothing wrong at the beautiful school set on rolling hills.

## 'An isolated incident'

In August, the Inquirer [reported](#) that a Glen Mills counselor had lifted a boy in the air, slammed him down on his back, then choked the asthmatic teen for several minutes while he cried, "I can't breathe."

The school's leaders called [the attack on A.W.](#), a 17-year-old from Philadelphia, an anomaly.

"We immediately self-reported an isolated incident involving staff that did not uphold our stringent ethical standards and protocols," said Ireson, the executive director, in an emailed statement at the time.



After A.W.'s attack, Philadelphia DHS Commissioner Cynthia Figueroa put a temporary hold on sending additional boys to the school, but commended its leadership's "100 percent ownership and accountability" of the incident. Boys have been sent to Glen Mills from Montgomery, Chester, and a dozen other Pennsylvania counties, but about 40 percent of the 383 students at the school at the time were from Philadelphia.



HEATHER KHALIFA / STAFF PHOTOGRAPHER

A teenager assaulted by counselors at Glen Mills last summer is photographed outside his Philadelphia home. A.W., who asked to be identified by his initials, said he couldn't breathe during the attack.

Since August, the school's enrollment has fallen to 238. Philadelphia DHS recently accepted a new corrective action plan from Glen Mills and, as of two weeks ago, had planned to resume sending boys there. Figueroa had said she was not aware of previous promises of reform that Glen Mills had made — then broken — to the state.

Less than three weeks after A.W.'s July beating, a counselor punched 19-year-old Mecca Simms in the face, breaking his nose.

Simms said in an interview that the counselor — a former Glen Mills student quarterback — was angry because the Philadelphia teen didn't get off the phone with his girlfriend quickly enough. The counselor hit Simms several times before he swung back, Simms said. Glen Mills staff waited two days to take him to the hospital, Simms said, where he had surgery on Aug. 8. Both counselor and student received police citations.

"It was the first time it happened to me," Simms said, "but kids always get hit like that there."

In 2017, a homesick boy from Los Angeles — who asked to be identified by his initials, J.R. — ran away from Glen Mills. (Because they are juveniles and abuse victims, the Inquirer agreed to identify sources like J.R. and A.W. by their initials.)

Staffers quickly found the 17-year-old in the woods, then took him to a school stairwell. Four counselors took turns sitting on J.R.'s chest, choking and punching him, while others looked on. His back ached, his throat hurt, and he could barely leave bed for weeks, he said in an interview.



Two different boys injured their heads so severely during “restraints” that school year that their scalps had to be stapled shut, according to court records. Another student had to receive stitches in his back after a counselor pushed him through a plateglass window in October 2017.

In June of that year, a Philadelphia student made a sexual joke about a counselor’s sister. Several staffers jumped the teenager, who weighed about 140 pounds. One of them stepped on his face, breaking his jaw.

It was wired shut when he appeared before a judge weeks later, according to a transcript of the June 23 hearing.

“Do you feel safe going back?” the judge asked the boy.

“No,” he said.

In the last five years, at least 13 Glen Mills staffers have been fired and dozens more have been retrained or reprimanded over assaults on 15 students at the school, according to records from the Pennsylvania Department of Human Services.

But the state’s records severely underestimate the violence at Glen Mills, which students and counselors described as almost daily. For one, the state’s records only include reports that are made. Thirteen current and former students told the Inquirer they did not speak to state investigators about their attacks because they were threatened to keep quiet or physically prevented from reporting them.

J.R. did not tell his parents or lawyer what happened to him in the stairwell after he ran away. “They’ll give you a minute phone call and stand right next to you to make sure you don’t tell your mom anything,” he said.

Other boys said they were kept hidden from the rest of the school, receiving their meals in their rooms. Another had his home passes revoked so that his family could not see him.

In secret, the violence could be extreme. The Inquirer discovered at least four incidents of students crying they were unable to breathe during assaults by staff. And even the most vulnerable students weren’t safe from the beatings.

Nathan Thomas was born with a heart condition called aortic stenosis. He had open-heart surgery when he was 3 years old.



**JOSE LUIS VILLEGAS**

Nathan Thomas was sent to Glen Mills after he got caught up in gang activity in Santa Cruz, Calif. Counselors left him alone because of his heart condition — until one caught him talking about the school's violent culture with a fellow student, then choked him and slammed his head into a dorm refrigerator.

When the 16-year-old from Santa Cruz, Calif., arrived at Glen Mills in 2011, he said he warned the staff he couldn't take blows to the chest.

Nathan quickly learned that counselors preferred to bash boys' heads into the door of the refrigerator at the back of Lincoln Hall, hearing the distinct thud and his classmates' screams from the next room over.

One day during his 2011-2013 stay, Nathan was caught playing hangman on a classroom whiteboard after finishing his schoolwork — a serious offense at Glen Mills, he said in an interview. A counselor he knew only as "Chris" dragged the teen by the collar to the refrigerator, where he said, "If you didn't have a f—ing heart condition, I would tear you up right now." Chris warned the teen that he wouldn't be so lucky next time.

Nathan promised there wouldn't be a next time. But less than two weeks later, he was using the bathroom when a new student spoke to him from the next stall over. "Is it true what I hear about this place?" he asked Nathan. "They beat up kids?"

The two boys sat in the stalls talking about the black eyes and busted lips Nathan had seen in his first months at Glen Mills. Then he flushed the toilet and opened the door. Chris was there and had heard everything. Before Nathan knew what was happening, he was back at the refrigerator.

The counselor grabbed him by the neck and slammed his head into the door, already dented by the skulls of his classmates. All the while, he choked him, spit in his face and screamed, "You stupid motherf—," Nathan said.

Another counselor came in and asked what was happening. He struck Nathan across the face. The boy started to cry as the beating continued, his fragile heart pounding in his chest.

Any teacher will tell you that controlling a classroom is a highly developed skill — one that's even more critical at a place like Glen Mills, where students have already run afoul of the law. But many Glen Mills counselors don't have the backgrounds or training they need to manage the boys in their care.

Ireson and his deputies have continued to recruit college athletes to Glen Mills, whether or not they had backgrounds working with troubled youth.



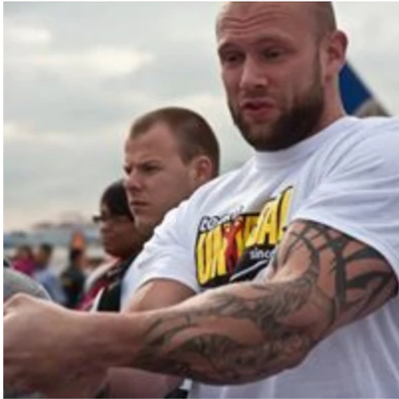



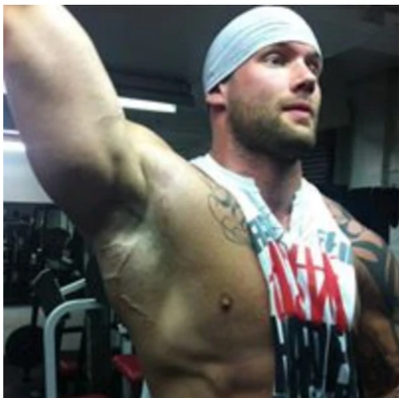
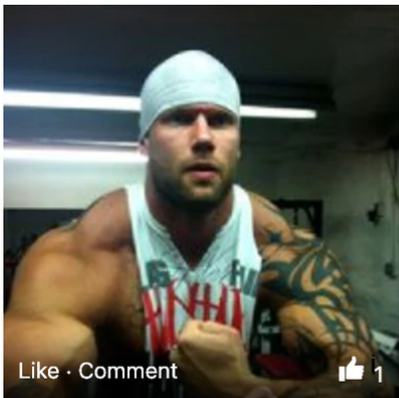
[Patrick Raquet](#), a professional strongman, earned a degree in psychology before Glen Mills made him a counselor in 2008. Six months before his promotion to supervisor, Raquet took first place in his class at the 2017 U.S. Powerlifting Association's National Bench Press and Deadlift Championship.

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## Patrick Raquet (USA)

18 Photos · Updated 5 years ago

Aka P Diesel. American strongman competitor, weight-lifter, probably amateur bodybuilder. Alpha stud!

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1

#### FACEBOOK

Patrick Raquet, who competes in powerlifting as "P Diesel," appears on a muscle-building Facebook page.

Last summer, [he was fired](#) for punching A.W. in the face.

Dennis McKimm II had worked as a part-time police officer in college before Glen Mills hired the 22-year-old. He had never considered working for a juvenile facility but needed work and saw the school's booth at a job fair, according to court records. In 2013, McKimm slammed a Philadelphia teen to the floor, shattering his elbow. He still works at Glen Mills, training his colleagues in "positive behavior and intervention supports."

Neither McKimm nor Raquet responded to requests for comment.



Cedric McNear was hired by Glen Mills six months after he walked off the job at another juvenile program. “I didn’t know how to deal with troubled youth that well,” McNear told the Inquirer, when asked why he abruptly left Abraxas Academy in Morgantown.

His time at Abraxas never came up in his Glen Mills interview, and McNear does not believe school leaders called Abraxas for a reference. In August 2018, McNear threw a cup at a child in the one hall with a surveillance camera, and was fired. “A lot of other stuff staff members did was worse and they were able to keep their jobs because it wasn’t on video,” he said.

Through a spokesperson for the school, Glen Mills leaders said they conduct phone and in-person interviews with potential candidates for counselor jobs, then take their fingerprints and run state and federal background checks.

In the corrective plan to Philadelphia DHS, the school’s leaders have now promised to hire a “preemployment screening company” to better determine a candidate’s “ability to work with difficult or high-risk youth and their ability to demonstrate patience.”

Hiring recent graduates or former athletes is not a problem within itself. Proper training can help to ensure counselors don’t lose their heads when put in charge of dozens of teenage boys, some with their own histories of violence. Boys come to Glen Mills for a variety of reasons, from racking up petty charges and violating probation, to wielding knives and participating in armed robberies.



DAVID SWANSON / STAFF PHOTOGRAPHER

Less than an hour's drive from Center City, the Glen Mills Schools receives about 40 percent of its students from Philadelphia. After a local boy was attacked by counselors in July, Philadelphia suspended intake at Glen Mills. Enrollment at the school has declined to 238 students from the 383 it housed in September.

Under Pennsylvania law, staff at residential facilities like Glen Mills are required to receive training every year on appropriate restraint techniques. These sessions must emphasize de-escalation (to avoid getting physical whenever possible) and include demonstrations of specific techniques for limiting a child’s movements.

Ireson’s predecessor pledged to retrain the school’s staff after a 2012 state child protective services investigation found that a counselor punished a child with an “inappropriate” restraint.

Ireson, who earned a doctorate degree in education while working at Glen Mills, became executive director on the first day of 2013. The next year, the state found that Glen Mills still was not providing adequate training.

According to sworn testimony from Glen Mills' in-house trainer, Carmelo Mustaccio, the school had not devised, let alone demonstrated, specific techniques for properly restraining students.

Instead, Mustaccio recertified Glen Mills' counselors each year by showing them a PowerPoint, demonstrating "gently" lowering others to the ground, and then giving out an open-book, multiple-choice quiz.

"Very rarely" did anyone fail the 15-question quiz, Mustaccio said. The third question asks: "Which of the following does Glen Mills NOT allow when addressing student behavior?" The options are "verbal ridicule," "poking and slapping," "kicking and choking," or "all of the above."

The counselors graded one another's papers. They could miss three questions and still pass. If someone failed the quiz, they stayed after class while the trainer went over the right answers, Mustaccio said. Then they took the same quiz again.

"It's really just a big con. It's a big show."

Robert Taylor, former Glen Mills counselor

"It's all BS," said Robert Taylor, who worked at Glen Mills from 2006 until 2018, most recently as a senior counselor and acting team leader. "It's really just a big con. It's a big show."

## 'I learned to look the other way'

Students at Glen Mills who want to report their abuse know that the system works against them: They have to contend with complicit counselors and burdensome processes seemingly designed to stifle complaints.

Several former students told the Inquirer that counselors often ignored attacks, joined in, or even helped to hide evidence. In a 2011 sworn affidavit, one boy describes seeing staff throw away a bloody white T-shirt after a boy was assaulted in a locked room by four counselors.

Many counselors at Glen Mills won't report on their fellow staff members when they witness abuse for fear of getting ostracized, demoted, or fired, former staff said in interviews.

"I learned to look the other way when counselors hit kids," said McNear, the counselor terminated last summer. McNear never reported on his fellow counselors, whom he saw punch, kick, and choke kids. "They wouldn't promote me, or move me to a different building, or they'd call me a snitch," he said.

James Johnson was a student at Glen Mills who graduated in 2009 and worked as a counselor from 2010 to 2012, and again from 2014 to 2015. He decided to quit, he said, after staff beat up a child, knocking his eye nearly out of its socket, then confined the student in his room, and manipulated the log book to hide the abuse.

He described Glen Mills as a "secret society" or "mob" where counselors who didn't go along with this behavior were punished.

By law, any counselor who suspects child abuse is required to immediately report it electronically or by calling ChildLine, the state's 24-hour hotline. The Department of Human Services then conducts its own investigation to determine whether the complaint is real.

The Glen Mills process for addressing problems is vastly different. It lacks anonymity, insulates top leadership, and provides ample opportunity for a complaint to get dismissed.

Here's how it works: Students are told to first report the problem to another student, "as a peer may be able to help resolve your grievance or give you helpful feedback." If that fails, students must report to their counselor "within five days of the date when you felt a right had been violated."

The counselor can dismiss the problem. But if the student presses the issue, his counselor is supposed to bring the complaint to the senior counselor. This is the first time it's tracked or written down. The senior counselor is supposed to address the problem, then ask the student to sign a form saying his grievance is resolved.

If a student refuses to sign, the issue is reported to the team leader. Then the group living director. Then the executive director. At every stage, the student must push for another review, and is urged to sign the form saying the matter is resolved.

It is only then — after getting one's complaint through six people — that “you will have the opportunity to talk with your Probation Officer or Worker.”

“I never heard of an employee reporting abuse,” said McNear, who worked at Glen Mills for three years. “They would only call Childline if it made them look good to do it.”

In its corrective action plan to DHS, Glen Mills leaders said they would hire an outside consultant to replace this student grievance procedure with a confidential process that would allow students “to feel empowered.”

As it stands now, Taylor said, the point of the “Glen Mills process” is to keep complaints from getting reported to DHS: “You keep it to yourself or go to your supervisor.”

Taylor was fired in June after more than a decade at Glen Mills. The school said he gave boys in his unit unauthorized haircuts; the counselor says he advocated too loudly for students' rights, and is suing Glen Mills for wrongful termination.

Supervisors are told to “fix it,” said Taylor. “Get the kid to say whatever you need him to say.”

In 2011, when a counselor broke a Philadelphia teen's elbow during a restraint, staff instructed Jamal Smith to tell the doctors he hurt himself playing sports, according to court records. The lie only fell apart when the surgeon called Jamal's mother, who knew her son didn't have enough “status” to participate in athletics at Glen Mills.

In an interview, A.W. said that counselor Chris Medina and his supervisor, Jim Lindquist, both begged him to not pursue a report after his assault last summer. A.W. said Lindquist told him he'd be sent to a state detention center.

“He even told me that it would be worse because the food wouldn't be as good.”

In the summer of 2017, boys in Fillmore Hall became so fearful for their safety that they decided to go straight to the top, according to documents obtained by the Inquirer.

They began slipping notes or letters under the door of Randy Ireson, saying a night-shift counselor was threatening to hurt them.



---

## Desperate Pleas

In a note slipped under the door of executive director Randy Ireson in 2017, a student begs for help with a threatening counselor in his dorm. In 2011, a student dictated stories of violence to his lawyer when she came to see him at Glen Mills.



“He be saying he will punch us in the face and choke us till we fall asleep and can’t wake up, to me that sound like death,” a handwritten letter from Aug. 2, 2017, reads. “I want to tell my parents and probation officer how Glen Mills is really like.”

Scratched out at the bottom of the page, the boy wrote: “Help us please Randy please.”

The executive director’s office was off-limits most of the time, but those who took nightly medication walked by his door as they passed through the administration building. Former students say they rarely, if ever, saw Ireson in person.

For a little while, the director instituted unscheduled checks of the hall where the allegedly threatening counselor worked. But quickly things went back to normal, and the counselor kept his job.

But there was one lasting change, counselors say: Ireson told his staff to reroute the boys. They no longer walk past his door: at night, during the day, on tours — never.

## Pushed out for speaking up

Even the counselors who want to protect their students know top brass doesn’t want their reports — and that if they force the issue, they’ll end up forced out.

When a counselor broke a boy’s elbow during Ireson’s first month as director, and it came to the state’s attention, officials there urged the new director to file a report of suspected child abuse. But Ireson refused, saying nothing improper had occurred.

“Understanding that you may not agree with this conclusion, please accept this note as an invitation to sit down at any time, with our respective legal counsel,” Ireson told the state supervisor in a letter.

Lawrence Livers repeatedly tried to alert his supervisors to abusive behavior by other counselors, only to be ignored, he said in a lawsuit filed in November. When he reported a counselor whom he saw kick a student in the face in May 2017, Livers’ supervisor said the counselor “must be having a bad day.”

A month later, Livers saw the same supervisor choke a student for talking after curfew. When he told another supervisor about the abuse, he was met with shrugging shoulders, according to the lawsuit.

That July, Livers says he saw another counselor pin a student to the ground with his knee in the boy’s chest while the boy screamed “I can’t breathe!” Livers says he tried to report this to his supervisor, who replied, “[He] does that all the time.”

Livers continued to see violence and attempt to report it through May 2018, when he says three staffers cornered and attacked a student. Two days later, Livers was abruptly fired — for allegedly failing to report a student injury.



## How We Got the Story

Internal documents, court records, incident reports, and more than 40 interviews with students, staff, and others show top leaders turned a blind eye to the beatings and insulated themselves from reports.

0008/0011

NO 1099 P. 2

Check this block if a report for student abuse

Check this block for child abuse

Check this block for child abuse within 30 days

TC:ANF:AKL  
19-00006-F

Via Electronic Mail  
Ms. Lisa Gartner  
The Phil...

POLICE

Docket Number: Date Filed: OTN/LiveScan Number

PHER Middle: NMN

used are described below with each Act of As  
re than one offense, each offense should be r  
advise the defendant of the nature of the offense(s) charged. A citation to the  
(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

01/05/2012 17:05 IFAX reports@glenmillschools.org

REPORTABLE  
CHILD RESIDENTIAL AND DA  
55 Pa. Code C

Initial Report Intermediate Report Final Report

A. FACILITY INFORMATION

Name of Legal Entity: Glen Mills Schools  
Address of Legal Entity: Site: 185 Glen Mills Road - Glen Mills, PA

Philadelphia, DOB [redacted] was sitting  
ed Group Interaction session in the lower recrea  
a verbally addressed [redacted] several times to lowe  
ie directives to stop arguing. Counselor/Teach  
re on the [redacted]

SOURCE: Inquirer and Daily News reporting

JON SNYDER / Staff Graphic

In the last year, at least three former counselors have filed wrongful-termination suits against Glen Mills, saying school leaders punished them for failing to keep quiet about the violence. Others quit voluntarily for the same reason.

Jim Rostick worked at Glen Mills for more than a decade before he called ChildLine in June 2017 over the teen with the broken jaw. He was swiftly demoted from senior counselor to regular staff with no explanation, Rostick said in an interview.

"I know they demoted me for reporting it, for putting a black eye on the school," said Rostick, who quit three months later. "If this was a place where they punched and stepped on kids, I couldn't stay."

Few counselors know the consequences of reporting abuse better than Shawn Magee.

In late 2011, Magee witnessed his supervisor punch a boy in the face, breaking his glasses — then falsify Monroe Hall's log records to cover it up. According to court records, Magee reported this up the chain at Glen Mills, but the counselor, the boy, and witnesses all said nothing happened. So Magee did something bold: He reported it directly to the state. (In court records, Glen Mills claims it called the state.)

About 10 days later, he was called in to meet with Glen Mills' lawyer. It was, after all these years, Guy Vilim — the same attorney who stood with Ferrainola as Glen Mills staff tried to bar state troopers from the school in 2000.

According to Magee's testimony in a lawsuit against the school, Vilim walked into the room and shook Magee's hand. Then the lawyer took off his glasses, leaned back in his chair, and said, "Dude, what are you doing?" Leaning forward, he added: "You're pissing a lot of people off."

Magee says Vilim told him: "You know, this is your last chance to think about what you're going to say before you go into that meeting with [state investigators]. Because if you don't, you're going to be out of here within two to three months."

He shared what he saw happen anyway. Investigators checked the supervisor's phone records and found a 40-minute call from Magee that corroborated Magee's account. The student also came clean about what happened. The supervisor was fired in January.

But true to Vilim's threat, Magee didn't last much longer at Glen Mills either. He said he was immediately retaliated against, reprimanded by his new supervisor for things like not counting the pins used in the laundry. His bosses claim he became erratic.

It came to a head one day when a student told Magee his head had slammed into a water fountain during a restraint. The counselor alerted his supervisor, who told him to go home. Unable to sleep that night, and concerned for the boy's safety, Magee made late-night calls to ChildLine and members of the Glen Mills board of trustees.

Glen Mills fired Magee on Feb. 8, less than six weeks after Vilim took off his glasses and asked him what he was doing.

## A lasting legacy

The nation's juvenile justice system is built on the belief that children can be saved, that they are young enough to change. The goal is not punishment, but rehabilitation, the redirection of criminal behavior so that the community becomes safer and these boys' lives become better.

In 2014, the U.S. House of Representatives honored Glen Mills for the "life-changing work it does for young men." The school has been open since the 1800s, churning out generations of boys, sculpting thousands of men.

But what has it made of them?

Some of them are not OK. Nathan Thomas, the boy with the heart condition, says he was depressed and hardly talked to anyone for years after he left Glen Mills. Now 23, he has nightmares that he is back in Lincoln Hall. Someone is always getting dragged to the refrigerator.

Richard Lewarski tells his own children about Glen Mills when they won't behave. He was spit on and choked in the early 2000s, a skinny 14-year-old from Cleveland, now 34. But it doesn't work; his daughter doesn't believe him, doesn't think a place like that could exist.

And in Santa Fe, N.M., a man named Eric Brams bolts up from another bad dream. He is 34 now, thousands of miles and nearly two decades away from what happened.



COURTESY ERIC BRAMS

Eric Brams was a star swimmer and 2002 graduate of the Glen Mills Schools. He says he was violently assaulted one day by multiple counselors in the gymnasium.

It was the end of 2001 — one year after Glen Mills promised the state it would protect its boys — and Brams was playing basketball in the gymnasium. Another student ran up and said he was wearing the wrong shoes. Boys have to wear white- or clear-soled shoes on the court.

In an interview, Brams said he was confused; he had been careful to wear the proper footwear. But he went to go speak with the counselor who had sent the student. “Excuse me, can I introduce myself?” he said, following the school’s protocol for addressing staff. “My name is Eric Brams, I live in Buchanan Hall, and I’m from Montgomery County, Pennsylvania —”

Those are the last words Brams could utter before the staffer, one of the biggest counselors at the school, picked him up in the air and threw him down on the court. Several other counselors came running.

Brams says he went limp, as though he were playing dead, as the counselors took turns lifting him high, then slamming him down, over and over.

Afterward, on each side of his back, under his armpits, was a bruised outline of four fingers where the men had gripped him. On both sides of his chest: a perfect thumb.



ADVERTISEMENT

For three weeks, he could barely walk. He tried not to think about what had triggered the attack. He had heard that counselors sometimes took out their own frustrations on boys for no reason. But what he eventually learned still shocked him.

Brams was a star swimmer on the Glen Mills team. At the regional competition, one of his team's student-managers said his counselor was the one who first attacked Brams.

"That dude doesn't like anyone from Montgomery County," the student explained. "That day he told our hall, 'If you see any of those pussies, send them my way.'"

Brams says he was named Glen Mills' 2002 Student Athlete of the Year. He graduated with a college scholarship. By most measures, he was a success story — the reason faraway delegations came touring, that the U.S. Congress gave honors.

But all these years later, when he wakes up from the nightmares, it's not the accolades or the podiums he remembers.

It's the fear.



HEATHER KHALIFA / STAFF PHOTOGRAPHER

A.W. says he has nightmares about the violence he experienced at Glen Mills last summer.

 [View 96 Comments](#)



**Bullets took their teammate, but on the Boys' Latin football field, Jahsun Patton's legacy lives on**



**Elite youth drum corps have become a haven for instructors with sexual misconduct in their past**



**He almost failed out of high school in North Philly. Now this Temple graduate is a Rhodes scholar**

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# Exhibit C

**VIOLATION REPORT**  
**CHILD RESIDENTIAL LICENSING - 55 Pa.Code Chapter 3800**

<b>Facility Name:</b> JEFFERSON FILLMORE HALL		<b>License Number:</b> 11298
<b>Address:</b> 185 GLEN MILLS ROAD, GLEN MILLS, PA 19342		<b>County:</b> Delaware
<b>Director:</b> Randy Ireson		<b>Region:</b> SOUTHEAST
<b>Legal Entity Name:</b> GLEN MILLS SCHOOLS		
<b>Legal Entity Address:</b> P.O. BOX 5001, CONCORDVILLE, PA 19331		
<b>Certificate(s) of Occupancy</b> NM  NM		
<b>Program Type:</b> Residential Services	<b>Licensed Capacity:</b> 68	<b>Number of Children Served:</b> 65
<b>Type of Inspection:</b> Partial	<b>BHA Docket Number:</b>	<b>Notice:</b> Unannounced
<b>Reason(s) for Inspection(s)</b> Incident		
<b>On-Site Inspections Dates and Department Representatives On-Site</b> 07/03/2014: Daniels, Michael; Dietz, Andrew		
<b>Off-Site Inspection Dates and Inspectors, if Applicable</b>		
<b>Other Details</b>		
<b>Partial or Full Triggers:</b>		<b>Random Indicators:</b>
<b>Child Demographic Data as of Inspection Dates</b>		
<b>Age of Children:</b> 0 to 5 years: 0 6 to 13 years: 0 14 to 17 years: 50 18 to 21 years: 15	<b>Number of Children who:</b> Are Adjudicated Delinquent: 65 Are Dependent: 0 Have Mental Illness: 0 Have an Intellectual Disability: 1 Have a Physical Disability: 0	



<b>Licensing Inspection Summary: 11296 - 07/03/2014 - Daniels, Michael</b> <b>Facility Name: JEFFERSON FILLMORE HALL</b>			
<b>1. REGULATION 55 Pa.Code §3800</b> <b>3800.32(b) - A child may not be abused, mistreated, threatened, harassed or subject to corporal punishment.</b>			
<b>2a. DESCRIPTION OF VIOLATION</b> On 6/4/2014 Child #1 was in the cafeteria with a large group of people. Child #1 and the group were asked to return to their seats, after the child was asked the child became disrespectful. Staff Member A then slapped the child in the face. Staff Member B then intervened and attempted to remove Child #1 from the cafeteria. Child #1 refused to move. Staff Member B then grabbed Child #1 and pushed the child onto the counter top and then slammed Child #1's head against the counter two times.			
<b>3. PLAN OF CORRECTION (POC)</b> (Attach pages as necessary. Remember that you must sign and date any attached pages.) <i>Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.</i>			
<p>The Glen Mills Schools understands the importance of Pa Code Title 55 3800.32(b) and will not tolerate the abuse, mistreatment, threats, harassment, or corporal punishment of a child. The Glen Mills Schools performed an internal investigation on June 4, 2014 and concluded that Child 1's rights were violated, so an immediate call to Childline was made that same day on June 4, 2014. Staff Members A and B were both relieved of their duties immediately on June 4, 2014 following the incident in question and were terminated on June 5, 2014. The Glen Mills Schools administration places a strong emphasis on a healthy and safe environment and will not tolerate any violations of our student's rights. On a weekly basis, the Glen Mills Schools incorporates the proper use of Behavior Intervention Techniques as part of our Staff Developmental Training. The Glen Mills School also has its own training division which conducts our Behavior Intervention Technique Training for all of our staff. Delivery is provided through qualified trainers and meets the approved training program for residential program staff. The training is offered on a sixty day cycle and staff are recertified annually. The Glen Mills Schools will continue to train our staff on the importance of this violation and will encourage the safety and well-being of our children.</p>			
Repeat Violation: No	Date(s) of Previous Violation(s):		
<b>Signature of Legal Entity Representative</b> (Required on EVERY Page)			
Printed Name and Title of Legal Entity Representative (Required on EVERY Page)		Date	
Dr. Randy A. Ireson		July 24, 2014	
<b>DEPARTMENT USE ONLY - FACILITIES MAY NOT WRITE BELOW THIS LINE!</b>			
The above plan of correction is approved as of <u>7/25/14</u> (Date)	Plan of correction implementation status as of <u>7/25/14</u> (Date)		
The above plan of correction was approved by <u>AMD</u> (Initials)	<input checked="" type="checkbox"/> Fully Implemented <input type="checkbox"/> Partially Implemented - Adequate Progress <input type="checkbox"/> Partially Implemented - Inadequate Progress <input type="checkbox"/> Not Implemented		



**pennsylvania**  
DEPARTMENT OF PUBLIC WELFARE

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**  
**MAILING DATE: July 25, 2014**

Dr. Randy A. Ireson  
Glen Mills School  
C/o Chris Spriggs, Director  
Po Box 5001  
Concordville, Pennsylvania 19331

RE: Jefferson Fillmore Hall  
185 Glen Mills Road  
Glen Mills, Pennsylvania 19342  
License # 112960

Dear Dr. Ireson:

As a result of the Department of Public Welfare's licensing inspection on July 3, 2014 of the above facility, the violations with 55 Pa.Code Ch. 3800 (relating to Child Residential and Day Treatment Facilities) specified on the enclosed License Inspection Summary were found.

All violations specified on the enclosed License Inspection Summary must be corrected by the dates specified on the License Inspection Summary and continued compliance with 55 Pa.Code Ch. 3800 must be maintained.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew M. Dietz".

Andrew M. Dietz  
Child Residential Licensing Manager

Enclosure  
Licensing Inspection Summary

**VIOLATION REPORT**  
**CHILD RESIDENTIAL LICENSING - 55 Pa.Code Chapter 3800**

Facility Name: JEFFERSON FILLMORE HALL		License Number: 11296
Address: 185 GLEN MILLS ROAD, GLEN MILLS, PA 19342		County: Delaware
Director: Randy Ireson		Region: SOUTHEAST
Legal Entity Name: GLEN MILLS SCHOOLS		
Legal Entity Address: P.O. BOX 6001, CONCORDVILLE, PA 19331		
Certificate(s) of Occupancy NM  NM		
Program Type: Residential Services	Licensed Capacity: 68	Number of Children Served: 66
Type of Inspection: Partial	BHA Docket Number:	Notice: Unannounced
Reason(s) for Inspection(s) Complaint		
On-Site Inspections Dates and Department Representatives On-Site 12/10/2014: Smith, Cassaundra; Miller, Andrew		
Off-Site Inspection Dates and Inspectors, if Applicable		
Other Details		
Partial or Full Triggers:		Random Indicators:
Child Demographic Data as of Inspection Dates		
Age of Children:  0 to 5 years: 0  6 to 13 years: 0  14 to 17 years: 51  18 to 21 years: 15	Number of Children who:  Are Adjudicated Delinquent: 65  Are Dependent: 1  Have Mental Illness: 0  Have an Intellectual Disability: 0  Have a Physical Disability: 0	



Licensing Inspection Summary: 11298 - 12/10/2014 - Smith, Cassandra  
 Facility Name: JEFFERSON FILLMORE HALL

**1. REGULATION 55 Pa.Code §3800**

3800.32(b) - A child may not be abused, mistreated, threatened, harassed or subject to corporal punishment.

**2a. DESCRIPTION OF VIOLATION**

On September 30, 2014, while in a group setting, Staff member A verbally confronted the group about being disruptive. A disrespectful comment was made regarding the staff member being weak and Staff member A assumed Child #1 made the comment. Staff member A confronted the child and the child denied making the comment. Staff member A then approached Child #1 as the child was seated on the couch, grabbing the child's face and pushing it. The back of the child's head hit the corner of a fire extinguisher cabinet causing an injury.

**3. PLAN OF CORRECTION (POC)** (Attach pages as necessary. Remember that you must sign and date any attached pages)

*Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.*

The Glen Mills Schools understands the importance of Pa Code Title 55 3800.32(b) and will not support abuse, mistreatment, threats, harassment, or corporal punishment of a child. A Team Leader of Jefferson/Fillmore interviewed staff following an incident on September 30, 2014 and concluded that Child 1's rights were violated. Subsequently, a call was made to Childline on September 30, 2014. Staff Member A was relieved of his duties and terminated on October 1, 2014 for acting outside of our Behavior Intervention Training and for not following the Glen Mills Schools Professional Code of Conduct. In response to this repeat violation, the Team Leaders of Jefferson/Fillmore have addressed all of their staff in the weekly team meeting on the importance of providing a safe and healthy environment for our students. In addition, the Glen Mills Schools will have one of our lead trainers perform a Behavior Intervention refresher course, specifically for all the staff members in Jefferson/Fillmore. This process has begun and all the staff members are currently being scheduled for this training. The Glen Mills Schools will continue to train our staff on the importance of this regulation and will encourage the safety and well-being of our children.

Repeat Violation: Yes

Date(s) of Previous Violation(s):

07/03/2014

Signature of Legal Entity Representative  
 (Required on EVERY Page)

*Randy Ireson*

Printed Name and Title of Legal Entity Representative  
 (Required on EVERY Page)

Dr. Randy A. Ireson

Date January 23, 2015

**DEPARTMENT USE ONLY - FACILITIES MAY NOT WRITE BELOW THIS LINE!**

The above plan of correction is approved as of

*1/28/15*  
 (Date)

Plan of correction Implementation status as of

*1/28/15*  
 (Date)

The above plan of correction was approved by

*HTD*  
 (Initials)

- ☐ Fully Implemented  
☒ Partially Implemented - Adequate Progress  
☐ Partially Implemented - Inadequate Progress  
☐ Not Implemented



**pennsylvania**

DEPARTMENT OF HUMAN SERVICES

MAILING DATE: MAR -4 2015

Dr. Randy A. Ireson, Executive Director  
Glen Mills Schools  
C/o Chris Spriggs, Director  
Po Box 5001  
Concordville, Pennsylvania 19331

RE: Jefferson Fillmore Hall  
185 Glen Mills Road  
Glen Mills, Pennsylvania 19342  
License #: 112960

Dear Dr. Ireson:

As a result of the Department of Human Services' licensing inspection on December 10, 2014 of the above facility, the violations with 55 Pa.Code Ch. 3800 (relating to Child Residential and Day Treatment Facilities) specified on the enclosed License Inspection Summary were found.

All violations specified on the enclosed License Inspection Summary must be corrected by the dates specified on the License Inspection Summary and continued compliance with 55 Pa.Code Ch. 3800 must be maintained.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. Daniels".

Michael J. Daniels  
Acting Child Residential Licensing Manager

Enclosure  
Licensing Inspection Summary

**VIOLATION REPORT**  
**CHILD RESIDENTIAL LICENSING - 55 Pa.Code Chapter 3800**

Facility Name: JEFFERSON FILLMORE HALL		License Number: 11296
Address: 185 GLEN MILLS ROAD, GLEN MILLS, PA 19342		County: Delaware
Director: Chris Spriggs		Region: SOUTHEAST
Legal Entity Name: GLEN MILLS SCHOOLS		
Legal Entity Address: P.O. BOX 5001, CONCORDVILLE, PA 19331		
Certificate(s) of Occupancy NM  NM		
Program Type: Residential Services	Licensed Capacity: 68	Number of Children Served: 68
Type of Inspection: Partial	BHA Docket Number:	Notice: Unannounced
Reason(s) for Inspection(s) Complaint		
On-Site Inspections Dates and Department Representatives On-Site 11/24/2015: Murray, Kaillyn; Delaney, Alesia		
Off-Site Inspection Dates and Inspectors, if Applicable 12/03/2015: Murray, Kaillyn		
Other Details		
Partial or Full Triggers:		Random Indicators:
Child Demographic Data as of Inspection Dates		
Age of Children: 0 to 5 years: 0 6 to 13 years: 0 14 to 17 years: 47 18 to 21 years: 21	Number of Children who: Are Adjudicated Delinquent: 67 Are Dependent: 1 Have Mental Illness: 0 Have an Intellectual Disability: 2 Have a Physical Disability: 0	



Licensing Inspection Summary: 11296 - 11/24/2015 - Murray, Kaitlyn  
Facility Name: JEFFERSON FILLMORE HALL

**1. REGULATION 55 Pa.Code §3800**

3800.32(b) - A child may not be abused, mistreated, threatened, harassed or subject to corporal punishment.

**2a. DESCRIPTION OF VIOLATION**

On 9/17/15, Staff Member A was involved in a restraint with Child #1. During the restraint, which occurred in the bathroom outside of the cafeteria, Staff Member A grabbed Child #1 by his upper shoulders and shoved Child #1 up against the wall causing Child #1 to hit their head on a concrete wall. As a result, Child #1 received a laceration over their right eye. At approximately 8:50AM, Child #1 was transported to Riddle Memorial Hospital for further evaluation of their injury. At approximately 9:13AM, Child #1 received 5 sutures to repair the injury.

**3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)**

*Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.*

The Glen Mills Schools understands the importance of Pa Code Title 55 3800.32(b) and will not tolerate the abuse, mistreatment, threats, harassment, or corporal punishment of a child. Following the incident in questions on September 17, 2015 Staff Member A was relieved of his duties and placed on administrative leave until October 28, 2015. Subsequently, Staff Member A was also suspended without pay for 5 days from October 29, 2015 to November 4, 2015. Staff Member A returned to work on November 5, 2015 and was placed on a 90 day probationary period, where he was expected to repeat Handle with Care Training and Behavior Intervention Training. In addition, Staff Member A was also expected to complete Motivational Interviewing Training. Staff Member A completed his Handle with Care Training and Behavior Intervention Training on November 13, 2015. Staff Member A has also completed his Motivational Interviewing training on December 3, 2015. Please see attachments A, B, and C to show confirmation of the completed trainings. The Glen Mills Schools administration places a strong emphasis on a healthy and safe environment for our students and will continue to train our staff on the importance of this violation.

KMM

Repeat Violation: No	Date(s) of Previous Violation(s):		
Signature of Legal Entity Representative (Required on EVERY Page)			
Randy Ireson			
Printed Name and Title of Legal Entity Representative (Required on EVERY Page)		Date	
Dr. Randy A. Ireson		February 9, 2016	
<b>DEPARTMENT USE ONLY - FACILITIES MAY NOT WRITE BELOW THIS LINE!</b>			
The above plan of correction is approved as of <u>3/21/16</u> (Date)		Plan of correction implementation status as of <u>3/21/16</u> (Date)	
The above plan of correction was approved by <u>KMM</u> (Initials)		<input type="checkbox"/> Fully Implemented <input checked="" type="checkbox"/> Partially Implemented - Adequate Progress <input type="checkbox"/> Partially Implemented - Inadequate Progress <input type="checkbox"/> Not Implemented	



**pennsylvania**  
DEPARTMENT OF HUMAN SERVICES

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**  
**MAILING DATE:**

**APR 04 2016**

Mr. Randy A. Ireson, Executive Director  
c/o Dr. Chris Spriggs, Director of Reg. Comp  
Glen Mills School  
P.O. Box 5001  
Concordville, PA 19331

RE: Jefferson/Fillmore Hall  
185 Glen Mills Road  
Glen Mills, PA 19342  
License #112960

Dear

As a result of the Department of Human Services' licensing inspection on November 11, 2015 of the above facility, the violations with 55 Pa.Code Ch. 3800 (relating to Child Residential and Day Treatment Facilities) specified on the enclosed License Inspection Summary were found.

All violations specified on the enclosed License Inspection Summary must be corrected by the dates specified on the License Inspection Summary and continued compliance with 55 Pa.Code Ch. 3800 must be maintained.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Miller".

Kevin Miller  
Acting Child Residential Licensing Manager

Enclosure  
Licensing Inspection Summary

**VIOLATION REPORT**  
**CHILD RESIDENTIAL LICENSING - 55 Pa.Code Chapter 3800**

Facility Name: MCKINLEY HALL		License Number: 13730
Address: 185 GLEN MILLS ROAD, GLEN MILLS, PA 19342		County: Delaware
Director: Dr. Randy Ireson		Region: SOUTHEAST
Legal Entity Name: GLEN MILLS SCHOOLS		
Legal Entity Address: P.O. BOX 5001, CONCORDVILLE, PA 19331		
Certificate(s) of Occupancy C-2 LP 08/08/2003 Dept. of Labor and Industry		
Program Type: Residential Services	Licensed Capacity: 81	Number of Children Served: 51
Type of Inspection: Full	BHA Docket Number:	Notice: Announced
Reason(s) for Inspection(s) Renewal		
On-Site Inspections Dates and Department Representatives On-Site 03/23/2015: Smilh, Cassandra; Miller, Kevin; Dunn, Tierra; Oster, Belh 03/24/2015: Smilh, Cassandra; Miller, Kevin; Dunn, Tierra; Oster, Belh 03/25/2015: Smilh, Cassandra; Miller, Kevin; Dunn, Tierra; Oster, Belh 03/26/2015: Smilh, Cassandra; Miller, Kevin; Dunn, Tierra; Daniels, Michael		
Off-Site Inspection Dates and Inspectors, If Applicable		
Other Details		
Partial or Full Triggers:		Random Indicators:
Child Demographic Data as of Inspection Dates		
Age of Children: 0 to 5 years: 0 6 to 13 years: 0 14 to 17 years: 42 18 to 21 years: 9	Number of Children who: Are Adjudicated Delinquent: 51 Are Dependent: 0 Have Mental Illness: 0 Have an Intellectual Disability: 0 Have a Physical Disability: 0	

Licensing Inspection Summary: 13730 - 03/23/2015 - Smith, Cassandra	
Facility Name: MCKINLEY HALL	
1. REGULATION 55 Pa.Code §3800 3800.32(b) - A child may not be abused, mistreated, threatened, harassed or subject to corporal punishment.	
2a. DESCRIPTION OF VIOLATION On 3/12/2015, Child #1 was being verbally confronted about inappropriate behavior the child had displayed earlier in the evening. While the child was talking with staff, Staff Member A entered the room to offer feedback and mentioned to the child that the child was starting to struggle with his behavior. The child stated, "I didn't start to struggle with my behavior, I did struggle." Staff Member A then reached over staff and grabbed Child #1 by the neck and pushed the child against the closet, breaking the closet door. Staff Member A was instructed to go downstairs to the office to separate the staff member from the child.	
3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages) <i>Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.</i> The Glen Mills Schools understands the importance of Pa Code Title 3800.32(b) and will not support abuse, mistreatment, threats, harassment, or corporal punishment of a child. Immediately following the incident in question on March 12, 2015 at approximately 11:30 PM the AM Senior Counselor of McKinley Hall relieved Staff Member A of his duties and placed him on administrative leave for violating Child 1's rights. Subsequently, a call was made to Childline on March 13, 2015 at approximately 12:40 AM. The Team Leader of McKinley Hall interviewed the staff and students involved on March 13, 2015. Following the interviews, the Team Leader of McKinley Hall terminated Staff Member A on March 13, 2015 for acting outside of our Behavior Intervention Training and for not following the Glen Mills Schools Professional Code of Conduct. In response to this violation, the Team Leader of McKinley Hall has addressed all of his staff on March 18, 2015 in their weekly team meeting following the issue in question on the importance of providing a safe and healthy environment for our students. The Glen Mills Schools will continue to train our staff on respecting the rights of our children and on the importance of this regulation. <i>The administrator or designee will conduct a training on abuse of a child and how to de-escalate a child's behavior to all staff within 30 days of receipt of this plan of correction.</i>	
Repeat Violation: No	Date(s) of Previous Violation(s):
Signature of Legal Entity Representative (Required on EVERY Page) <i>Randy Ireson</i>	
Printed Name and Title of Legal Entity Representative (Required on EVERY Page) Dr. Randy A. Ireson	Date May 22, 2015
DEPARTMENT USE ONLY - FACILITIES MAY NOT WRITE BELOW THIS LINE!	
The above plan of correction is approved as of <u>6/15/15</u> (Date)	Plan of correction implementation status as of <u>6/15/15</u> (Date)
The above plan of correction was approved by <u>KCH</u> (Initials)	<input type="checkbox"/> Fully Implemented <input checked="" type="checkbox"/> Partially Implemented - Adequate Progress <input type="checkbox"/> Partially Implemented - Inadequate Progress <input type="checkbox"/> Not Implemented



Licensing Inspection Summary: 13730 - 03/23/2015 - Smith, Cassandra

Facility Name: MCKINLEY HALL

**1. REGULATION 55 Pa.Code §3800**

3800.132(e) - A fire drill shall be held during sleeping hours at least every 6 months.

**2a. DESCRIPTION OF VIOLATION**

The most recent fire drill held during sleeping hours was conducted on 05/23/2014 8:15am.

**3. PLAN OF CORRECTION (POC)** (Attach pages as necessary. Remember that you must sign and date any attached pages)*Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.*

The Glen Mills Schools understands the importance of Pa Code Title 55 3800.132(e) which states that a fire drill shall be held during sleeping hours every 6 months. To ensure the drills will occur every 6 months during sleeping hours, the Group Living Director [REDACTED] has assigned the Night Division Supervisors to make sure that every 6 months an unannounced fire drill is held in each residential facility during sleeping hours. The process is active and functioning and as the most up to date sleep hour fire drill was held for McKinley Hall on April 23, 2015 and the next scheduled sleep hour fire drill is scheduled [REDACTED] within 6 months of the most recent sleeping hour fire drill.

Repeat Violation: No

Date(s) of Previous Violation(s):

Signature of Legal Entity Representative  
(Required on EVERY Page)

Randy Ireson

Printed Name and Title of Legal Entity Representative  
(Required on EVERY Page)

Dr. Randy A. Ireson

Date May 22, 2015

**DEPARTMENT USE ONLY - FACILITIES MAY NOT WRITE BELOW THIS LINE**

The above plan of correction is approved as of

6/15/15  
(Date)

Plan of correction implementation status as of

6/15/15  
(Date)

The above plan of correction was approved by

MTA  
(Initials)☐ Fully Implemented☒ Partially Implemented - Adequate Progress☐ Partially Implemented - Inadequate Progress☐ Not Implemented



**pennsylvania**  
DEPARTMENT OF HUMAN SERVICES

Dr. Randy A. Ireson, Executive Director  
c/o Chris Spriggs, Director Regulatory Compliance  
Glen Mills Schools  
P.O. Box 5001  
Concordville, Pennsylvania 19331

JUL 30 2015

RE: McKinley Hall  
185 Glen Mills Road  
Glen Mills, Pennsylvania 19342  
License #: 137300

Dear Dr. Ireson:

As a result of the Department of Human Services' licensing inspection on March 23, 2015, March 24, 2015, March 25, 2015 and March 26, 2015 of the above facility, the violations with 55 Pa.Code Ch. 3800 (relating to Child Residential and Day Treatment Facilities) specified on the enclosed License Inspection Summary were found.

All violations specified on the enclosed License Inspection Summary must be corrected by the dates specified on the License Inspection Summary and continued compliance with 55 Pa.Code Ch. 3800 must be maintained.

Your regular license for the period July 1, 2015 to July 1, 2016 was issued on March 19, 2015. Your regular license remains in good standing.

Sincerely,

Matthew J. Jones  
Director

Enclosure  
Licensing Inspection Summary

**VIOLATION REPORT**  
**CHILD RESIDENTIAL LICENSING - 55 Pa.Code Chapter 3800**

Facility Name: MADISON HALL		License Number: 11294
Address: 185 GLEN MILLS ROAD, GLEN MILLS, PA 19342		County: Delaware
Director: Dr. Randy A. Ireson		Region: SOUTHEAST
Legal Entity Name: GLEN MILLS SCHOOLS		
Legal Entity Address: P.O. BOX 5001, CONCORDVILLE, PA 19331		
Certificate(s) of Occupancy		
Program Type: Residential Services	Licensed Capacity: 68	Number of Children Served: 44
Type of Inspection: Partial	BHA Docket Number:	Notice: Unannounced
Reason(s) for Inspection(s) Complaint		
On-Site Inspections Dates and Department Representatives On-Site 07/26/2016: Murray, Kaitlyn; Jennings, Lauren; Barr, Sara		
Off-Site Inspection Dates and Inspectors, if Applicable		
Other Details		
Partial or Full Triggers:		Random Indicators:
Child Demographic Data as of Inspection Dates		
<b>Age of Children:</b> 0 to 5 years: 0 6 to 13 years: 0 14 to 17 years: 40 18 to 21 years: 4	<b>Number of Children who:</b> Are Adjudicated Delinquent: 43 Are Dependent: 1 Have Mental Illness: 0 Have an Intellectual Disability: 0 Have a Physical Disability: 0	

Licensing Inspection Summary: 11294 - 07/26/2016 - Murray, Kalllyn  
Facility Name: MADISON HALL

**1. REGULATION 55 Pa.Code §3800**

3800.32(b) - A child may not be abused, mistreated, threatened, harassed or subject to corporal punishment.

**2a. DESCRIPTION OF VIOLATION**

On [REDACTED] Staff Member A restrained Child #1. During the restraint, Child #1 alleged that Staff Member A placed their hands around the neck of Child #1 and choked them. The nursing assessment from [REDACTED] for Child #1, identified visible red marks on the right side neck of Child #1.

**3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)**

*Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.*

The Glen Mills Schools understands the importance of 55 Pa Code 3800.32(b) and will not tolerate the abuse, mistreatment, threats, harassment, or corporal punishment of a child. The Glen Mills Schools performed an internal investigation on [REDACTED] and as a result of Child 1's allegation, an immediate call to Childline was made that same day on [REDACTED]. Staff Members A was relieved of [REDACTED] duties immediately on [REDACTED] and was also terminated on [REDACTED] for failing to follow the Glen Mills Schools Behavior Intervention Training and for not acting in a professional manner. The Glen Mills Schools administration places a strong emphasis on a healthy and safe environment and will not tolerate any violations of our student's rights. The Glen Mills Schools will continue to train our staff on the importance of this violation and will encourage the safety and well-being of our children.

KMM

Repeat Violation: No

Date(s) of Previous Violation(s):

Signature of Legal Entity Representative  
(Required on EVERY Page)

*Randy Ireson*

Printed Name and Title of Legal Entity Representative  
(Required on EVERY Page)

Dr. Randy A. Ireson

August 3, 2016  
Date

**DEPARTMENT USE ONLY - FACILITIES MAY NOT WRITE BELOW THIS LINE!**

The above plan of correction is approved as of

8/3/16  
(Date)

Plan of correction implementation status as of

8/5/16  
(Date)

The above plan of correction was approved by

KMM  
(Initials)

- ☐ Fully Implemented  
☒ Partially Implemented - Adequate Progress  
☐ Partially Implemented - Inadequate Progress  
☐ Not Implemented





**pennsylvania**  
DEPARTMENT OF HUMAN SERVICES

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**  
**MAILING DATE: March 13, 2017**

Mr. Randy A. Ireson, Executive Director  
c/o Chris Spriggs, Director Reg. Comp  
Glen Mills School  
P.O. Box 5001  
Concordville, Pennsylvania 19331

RE: Madison Hall  
185 Glen Mills Road  
Glen Mills, Pennsylvania 19342  
License #: 112940

Dear Dr. Ireson:

As a result of the Department of Human Services' licensing inspection on July 26, 2016 of the above facility, the violations with 55 Pa.Code Ch. 3800 (relating to Child Residential and Day Treatment Facilities) specified on the enclosed License Inspection Summary were found.

All violations specified on the enclosed License Inspection Summary must be corrected by the dates specified on the License Inspection Summary and continued compliance with 55 Pa.Code Ch. 3800 must be maintained.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Miller".

Kevin Miller  
Residential Licensing Manager

Enclosure  
Licensing Inspection Summary

**VIOLATION REPORT**  
**CHILD RESIDENTIAL LICENSING - 55 Pa.Code Chapter 3800**

<b>Facility Name:</b> JEFFERSON FILLMORE HALL		<b>License Number:</b> 11286
<b>Address:</b> 185 GLEN MILLS ROAD, GLEN MILLS, PA 19342		<b>County:</b> Delaware
<b>Director:</b> Dr. Randy Ireson		<b>Region:</b> SOUTHEAST
<b>Legal Entity Name:</b> GLEN MILLS SCHOOLS		
<b>Legal Entity Address:</b> P.O. BOX 5001, CONCORDVILLE, PA 19331		
<b>Certificate(s) of Occupancy</b> NM  NM		
<b>Program Type:</b> Residential Services	<b>Licensed Capacity:</b> 68	<b>Number of Children Served:</b> 67
<b>Type of Inspection:</b> Partial	<b>BHA Docket Number:</b>	<b>Notice:</b> Unannounced
<b>Reason(s) for Inspection(s)</b> Complaint		
<b>On-Site Inspections Dates and Department Representatives On-Site</b> 12/05/2016: Taylor, Kahisha; Wooters, Sandra; Manson, Trina; Delaney, Alesia		
<b>Off-Site Inspection Dates and Inspectors, If Applicable</b>		
<b>Other Details</b>		
<b>Partial or Full Triggers:</b>		<b>Random Indicators:</b>
<b>Child Demographic Data as of Inspection Dates</b>		
<b>Age of Children:</b> 0 to 5 years: 0 6 to 13 years: 0 14 to 17 years: 54 18 to 21 years: 13	<b>Number of Children who:</b> Are Adjudicated Delinquent: 0 Are Dependent: 0 Have Mental Illness: 0 Have an Intellectual Disability: 0 Have a Physical Disability: 0	

Licensing Inspection Summary: 11286 - 12/05/2016 - Taylor, Kahlsha  
Facility Name: JEFFERSON FILLMORE HALL

**1. REGULATION 55 Pa.Code §3800**

3800.32(b) - A child may not be abused, mistreated, threatened, harassed or subject to corporal punishment.

**2a. DESCRIPTION OF VIOLATION**

On [REDACTED] Child #1 was assaulted by several peers on 2 separate occasions. Child #1 sustained a mild concussion, laceration over [REDACTED] eye and bruised ribs as a result of these assaults.

**3. PLAN OF CORRECTION (POC)** (Attach pages as necessary. Remember that you must sign and date any attached pages.)

*Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.*

The Glen Mills Schools understands the importance of Pa Code Title 55 3800.32(b) and will not tolerate the abuse, mistreatment, threats, harassment, or corporal punishment of a child. Jefferson/Fillmore Hall staff performed an internal investigation by interviewing the staff and students involved in the alleged incident on [REDACTED]. During the internal investigation, Child #1 attempted to assault several other students and had to be physically restrained by staff due to [REDACTED] threatening and aggressive behavior. During the investigation, the other student involved admitted to fighting Child #1, so the Team Leader and AM Senior counselor determined that the laceration on Child #1's eye was a result of the fight. In response to this violation, the Team Leaders of Jefferson/Fillmore have addressed all of their students on the acceptable behavior requirements as identified in the Glen Mills Schools Student Handbook. Each student receives this handbook upon admission to our campus. The Team Leaders emphasized to the students the importance of treating one another appropriately and making sure that they are aware that no student has a right to hurt another student. They reiterated that our students are never permitted to touch one another when dealing with peer to peer behaviors. The Team Leaders of Jefferson/Fillmore Hall are ultimately responsible to make sure that no student is abused, mistreated, threatened, harassed, or subject to corporal punishment. In addition, these topics will continue to be discussed in our Guided Group Interaction, School Wide Positive Behavior supports program, and our Evidence Based Classes.

Repeat Violation: Yes

Date(s) of Previous Violation(s):

11/24/2015

Signature of Legal Entity Representative  
(Required on EVERY Page)

*Randy Ireson*

Printed Name and Title of Legal Entity Representative  
(Required on EVERY Page)

Dr. Randy A. Ireson

Date February 17, 2017

**DEPARTMENT USE ONLY - FACILITIES MAY NOT WRITE BELOW THIS LINE!**

The above plan of correction is approved as of

2/24/17  
(Date)

Plan of correction Implementation status as of 2/24/17  
(Date)

- ☐ Fully Implemented  
☐ Partially Implemented - Adequate Progress  
☐ Partially Implemented - Inadequate Progress  
☐ Not Implemented

The above plan of correction was approved by

Kmm  
(Initials)

<b>Licensing Inspection Summary: 11286 - 12/05/2016 - Taylor, Kahisha</b> <b>Facility Name: JEFFERSON FILLMORE HALL</b>			
<b>1. REGULATION 55 Pa.Code §3800</b> 3800.32(c) - A child has the right to be treated with fairness, dignity and respect.			
<b>2a. DESCRIPTION OF VIOLATION</b> Child #1 was fearful that peers on the unit were going to jump █. Child #1 disclosed to Staff Member A that █ did not feel safe on that unit. Child #1 reported that Staff Member A told █ to stop being childish. Staff Member A admitted that █ did not protect Child #1 after Child #1 reported feeling unsafe to █.  During an initial investigation of Child #1, it was discovered that Child #2 was confronted by Staff Member B in the library sometime in the beginning of █. Staff Member B did not like the response of Child #2 to the confrontation. Staff Member B grabbed Child #2 by the shirt and shoved Child #2 through a chair. There were witnesses to this incident.			
<b>3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)</b> <i>Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.</i>  The Glen Mills Schools understands the importance of Pa Code Title 55 3800.32(c) which states that a child has the right to be treated with fairness, dignity, and respect. Child #1 shared with the BHSL during █ interview that █ told Staff Member A █ did not feel safe. This contradicts the information Staff Member A had previously received from Child #1, where █ only shared █ was not getting along with █ peers. It was determined by Staff Member A that Child #1's health and safety was not in jeopardy, so the student was not transferred at that time. Child #2 made an allegation to BHSL representatives during an initial investigation of Child #1 where █ alleged mistreatment from over 2 months ago. This was the first time Glen Mills Schools staff were made aware of this allegation. In response, Staff Member B was immediately placed on a plan of supervision where █ was not to have contact with Child #2. Child #2 was also transferred to another living unit for █ safety and wellbeing. The Glen Mills Schools takes this violation very seriously. The Team Leaders of Jefferson/Fillmore addressed all of their staff in each of their weekly team meeting following the incident in question. They discussed the importance of providing a safe and healthy environment for our students. In addition, all of the staff members in Jefferson/Fillmore were given a booster Behavioral Intervention Training course on November 30, 2016 and December 7, 2016. Please see Attachment A for the sign in sheets from the booster training for all the staff in Jefferson/Fillmore. The Glen Mills Schools will continue to train our staff on the importance of this regulation and will encourage the safety and well-being of our children.			
Repeat Violation: No	Date(s) of Previous Violation(s):		
<b>Signature of Legal Entity Representative</b> (Required on EVERY Page) <span style="float: right;"><i>Randy Ireson</i></span>			
<b>Printed Name and Title of Legal Entity Representative</b> (Required on EVERY Page) <span style="float: right;">Dr. Randy A. Ireson</span>		<b>Date</b> <span style="float: right;">February 17, 2017</span>	
<b>DEPARTMENT USE ONLY - FACILITIES MAY NOT WRITE BELOW THIS LINE!</b>			
The above plan of correction is approved as of <u>2/24/17</u> (Date)	Plan of correction implementation status as of <u>2/24/17</u> (Date)		
The above plan of correction was approved by <u>YMM</u> (Initials)	<input type="checkbox"/> Fully Implemented <input checked="" type="checkbox"/> Partially Implemented - Adequate Progress <input type="checkbox"/> Partially Implemented - Inadequate Progress <input type="checkbox"/> Not Implemented		



Licensing Inspection Summary: 11296 - 12/05/2016 - Taylor, Kahisha  
Facility Name: JEFFERSON FILLMORE HALL

**1. REGULATION 55 Pa.Code §3800**

3800.32(k) - A child has the right to appropriate medical, behavioral health and dental treatment.

**2a. DESCRIPTION OF VIOLATION**

Child #1 was physically assaulted by peers on [REDACTED] at approximately 2:30pm. Child #1 sustained a laceration over [REDACTED] that was continuously bleeding. The facilities nurse was notified and asked staff to send her a picture of the laceration. The facilities nurse made the decision not to treat Child #1 at that time. Child #1 was not treated by nursing until 7:00pm that evening. The laceration bleed continuously throughout the day. Child #1 was sent to the ER a few days later to be accessed by the ER. It was determined that Child #1 sustained a mild concussion, a laceration that needed stitches and an injury to [REDACTED] right hand.

**3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)**

*Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.*

The Glen Mills Schools understands the importance of Pa Code Title 55 3800.32(k) and will not tolerate the withholding of appropriate medical, behavioral health and dental treatment. It was determined through an internal investigation on [REDACTED] that Child #1 was involved in a fight that resulted in a laceration above [REDACTED] right eye. Due to the injury from the fight, first aid was administered by a staff member present by applying pressure to the laceration and by contacting the on call nurse. Although it was shared with Bureau of Human Services Licensing Representative by Child #1 that the laceration bled throughout the day, it was determined by Glen Mills Staff that the laceration stopped bleeding after pressure was applied. The on call nurse arrived on campus where she applied 4 steri-strips to close the laceration, provided ice, administered 600 mg of Ibuprofen, and performed a neurological check that was determined to be within normal limits. The same on call nurse evaluated Child #1 on [REDACTED] where the student was offered off campus medical attention. Due to Child #1's age (18), [REDACTED] was able to and did decline any further treatment. On Monday [REDACTED] per our Glen Mills Schools Restraint Policy Child #1 was seen at the Glen Mills Schools Health Center by one of the Doctors for a physical examination. It was during the physical examination where Child #1 first alleged to the Doctor that [REDACTED] was kicked in the head by another student. The Doctor immediately recommended that Child #1 be taken to Riddle Hospital Emergency Room to be evaluated. Child #1 was transported to Riddle Hospital by a Glen Mills Schools Counselor/Teacher and was seen by Emergency Room medical staff. Child #1 was discharged by [REDACTED] committing jurisdiction and never returned to the Glen Mills Schools campus. The Glen Mills Schools takes this violation very seriously as the on call nurse has been terminated due to this incident, as well as other work performance issues. In response the Glen Mills Schools Head Nurse has addressed all of her staff on the importance of providing appropriate medical treatment and arriving on campus within a reasonable timeframe. It is the responsibility of the on call nurse to assess the situation and determine the appropriate medical treatment.

Repeat Violation: No

Date(s) of Previous Violation(s):

Signature of Legal Entity Representative  
(Required on EVERY Page)

*Randy Ireson*

Printed Name and Title of Legal Entity Representative  
(Required on EVERY Page)

Dr. Randy A. Ireson

Date February 17, 2017

**DEPARTMENT USE ONLY - FACILITIES MAY NOT WRITE BELOW THIS LINE**

The above plan of correction is approved as of

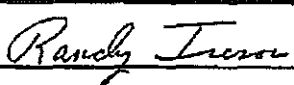
2/21/17  
(Date)

Plan of correction Implementation status as of 2/24/17  
(Date)

- ☐ Fully Implemented  
☒ Partially Implemented - Adequate Progress  
☐ Partially Implemented - Inadequate Progress  
☐ Not Implemented

The above plan of correction was approved by

KMM  
(Initials)

<b>Licensing Inspection Summary: 11296 - 12/05/2016 - Taylor, Kahisha</b> <b>Facility Name: JEFFERSON FILLMORE HALL</b>	
<b>1. REGULATION 55 Pa.Code §3800</b> 3800.142 - If the health and safety assessment in § 3800.141 (relating to health and safety assessment) identifies a health or safety risk, a written plan to protect the child shall be developed and implemented within 24 hours after the assessment is completed.	
<b>2a. DESCRIPTION OF VIOLATION</b> Staff Member A did not create a plan of safety for Child #1 after Child #1 reported to Staff Member that [redacted] did not feel safe around peers. Child #1 was physically assaulted by those peers a few days later.	
<b>3. PLAN OF CORRECTION (POC)</b> (Attach pages as necessary. Remember that you must sign and date any attached pages.) <i>Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.</i>	
<p>The Glen Mills Schools understands the importance of Pa Code Title 55 3800.142 which states that if the health and safety assessment in 3800.141 (relating to health and safety assessment) identifies a health or safety risk, a written plan to protect the child shall be developed and implemented within 24 hours after the assessment is completed. Child #1 shared with the BHSI during [redacted] interview that [redacted] told Staff Member A [redacted] did not feel safe. This contradicts the information Staff Member A had previously received from Child #1, where [redacted] only shared [redacted] was not getting along with [redacted] peers. It was determined by Staff Member A that Child #1's health and safety was not in jeopardy, so Staff Member A did not develop a written plan. In addition, an internal investigation performed by the Glen Mills Schools a few days later determined that Child #1 was involved in a fight not an assault and that Child #1's out of control, aggressive, and a threat to [redacted] and others, which resulted in [redacted] being physical restrained. It is the practice at the Glen Mills Schools that if a health and safety assessment identifies a health or safety risk, a written plan to protect that child shall be developed and implemented within 24 hours after the assessment is completed. It is also the practice at the Glen Mills Schools to have a working knowledge of the Child Abuse Recognition and Reporting Training. The Team Leaders of each licensed building are ultimately responsible to make sure that if necessary a written plan to protect the child is implemented within 24 hours. The Assistant Group Living Director reiterated these processes with all the Team Leaders of the licensed buildings on campus. The Team Leader of each licensed building discussed the health and safety assessment/plans as it pertains to student safety in the weekly team meeting following receiving this violation. The Director of Admission also reiterated this process with all of his medical staff.</p>	
Repeat Violation: No	Date(s) of Previous Violation(s):
Signature of Legal Entity Representative (Required on EVERY Page)	
	
Printed Name and Title of Legal Entity Representative (Required on EVERY Page)	Date
Dr. Randy A. Ireson	February 17, 2017
<b>DEPARTMENT USE ONLY - FACILITIES MAY NOT WRITE BELOW THIS LINE!</b>	
The above plan of correction is approved as of <u>2/24/17</u> (Date)	Plan of correction implementation status as of <u>2/24/17</u> (Date)
The above plan of correction was approved by <u>HMM</u> (Initials)	<input type="checkbox"/> Fully Implemented <input checked="" type="checkbox"/> Partially Implemented - Adequate Progress <input type="checkbox"/> Partially Implemented - Inadequate Progress <input type="checkbox"/> Not Implemented



**pennsylvania**  
DEPARTMENT OF HUMAN SERVICES

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**  
**MAILING DATE: March 2, 2017**

Dr. Randy A. Ireson  
Glen Mills Schools  
P.O. Box 5001  
Concordville, PA 19331

RE: Jeffereson / Fillmore Hall  
License #112960

Dear Dr. Ireson:

As a result of the Department of Human Services' licensing inspection on December 5, 2016 of the above facility, the violations with 55 Pa.Code Ch. 3800 (relating to Child Residential and Day Treatment Facilities) specified on the enclosed License Inspection Summary were found.

All violations specified on the enclosed License Inspection Summary must be corrected by the dates specified on the License Inspection Summary and continued compliance with 55 Pa.Code Ch. 3800 must be maintained.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Miller'.

Kevin Miller  
Child Residential Licensing Manager

Enclosure  
Licensing Inspection Summary