



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF HEALTH AND HUMAN SERVICES
LANSING

ELIZABETH HERTEL
DIRECTOR

July 29, 2022

Bruce Mossburg
Bethany Christian Services - Refugee Program
1050 36th St S.E. Ste 400
Grand Rapids, MI 49508

RE: License #: CB410200974
Investigation #: 2022C0212019
Bethany Christian Services - Refugee Program

Dear Mr. Mossburg:

Attached is the Special Investigation Report for the above referenced facility. Due to the violations identified in the report, a written corrective action plan is required. The corrective action plan is due 15 days from the date of this letter and must include the following:

- How compliance with each rule will be achieved.
- Who is directly responsible for implementing the corrective action for each violation.
- Specific time frames for each violation as to when the correction will be completed or implemented.
- How continuing compliance will be maintained once compliance is achieved.
- The signature of the responsible party and a date.

If you desire technical assistance in addressing these issues, please feel free to contact me. In any event, the corrective action plan is due within 15 days. Failure to submit an acceptable corrective action plan will result in disciplinary action.

Please review the enclosed documentation for accuracy and contact me with any questions. In the event that I am not available, and you need to speak to someone immediately, please contact Jessica VandenHeuvel, the area manager at (616) 204-6992.

Sincerely,

A handwritten signature in dark ink, appearing to read "Heather Reilly". The signature is written in a cursive, flowing style.

Heather Reilly, Licensing Consultant
MDHHS\Division of Child Welfare Licensing
22 Center Street
Ypsilanti, MI 48198
(734) 660-8309

enclosure

**MICHIGAN DEPARTMENT OF HEALTH AND HUMAN SERVICES
DIVISION OF CHILD WELFARE LICENSING
SPECIAL INVESTIGATION REPORT**

I. IDENTIFYING INFORMATION

License #:	CB410200974
Investigation #:	2022C0212019
Complaint Receipt Date:	06/24/2022
Investigation Initiation Date:	06/24/2022
Report Due Date:	08/23/2022
Licensee Name:	Bethany Christian Services Inc
Licensee Address:	901 Eastern Avenue NE Grand Rapids, MI 49503
Licensee Telephone #:	(616) 224-7610
Administrator:	Bruce Mossburg, Administrator
Licensee Designee:	George Tyndall, Designee
Name of Facility:	Bethany Christian Services - Refugee Program
Facility Address:	1050 36th St S.E. Ste 400 Grand Rapids, MI 49508
Facility Telephone #:	(616) 224-7540
Original Issuance Date:	07/01/1992
License Status:	REGULAR
Effective Date:	10/19/2020
Expiration Date:	10/18/2022
Capacity:	Unknown
Program Type:	CHILD PLACING AGENCY, PRIVATE

II. ALLEGATIONS

	Violation Established?
Youth is in Independent Living Placement. In February 2022, a staff member was contacting youth via social media and requesting nude photos and sharing inappropriate photos of themselves. Staff member visits youth at their apartment complex and talks to other female youth there, making youth uncomfortable. Staff member slept with 18-year-old youth that was recently moved to a new placement.	Yes

III. METHODOLOGY

06/24/2022	Special Investigation Intake, 2022C0212019
06/24/2022	Special Investigation Initiated – Letter, Notified CA
06/24/2022	Contact - Document Sent, Email to assigned DHHS worker
06/27/2022	Contact - Face to Face, Interviews with youth on-site
06/27/2022	Contact - Face to Face, Interviews with Director, and staff on-site
06/28/2022	Contact - Document Sent, Emails with DHHS regarding additional allegation
06/28/2022	Contact - Document Sent, Emails with program manager regarding safety plan and additional interviews.
06/28/2022	Contact - Telephone call made, Phone call to Case Worker to schedule additional interviews.
06/29/2022	Contact - Document Received, Documents reviewed.
07/07/2022	Contact - Face to Face Interviews completed on-site
07/08/2022	Contact - Telephone call made, Phone call to caseworker to schedule additional interviews.
07/08/2022	Contact - Document Sent, Email with Director
07/08/2022	Contact - Document Sent, Email with DHHS
07/11/2022	Contact - Telephone call made; Phone interviews attempted
07/12/2022	Contact - Telephone call made, Video conference with Area Manager to discuss findings
07/13/2022	Contact - Telephone call made; Phone interviews completed.
07/13/2022	Contact - Document Sent, Email with Director
07/13/2022	Contact - Telephone call made, case conference with DHHS and DCWL Area Manager.
07/14/2022	Contact - Telephone call made, Pre-exit with Director to discuss findings

ALLEGATION:

Incident #1

Youth is in Independent Living Placement. In February 2022, a staff member was contacting youth via social media and requesting nude photos and sharing inappropriate photos of themselves. Staff member visits youth at their apartment complex and talks to other female youth there, making youth uncomfortable.

Incident #2

Staff member slept with 18-year-old youth that was recently moved to a new placement.

INVESTIGATION:

Incident #1

On 6/24/22 the allegation was reported to DCWL. The complainant was contacted by phone for additional information and reported the agency just became aware of the allegation, although it reportedly happened several months prior. In approximately February 2022 Staff 1 reportedly messaged Youth A on “WhatsApp” stating the youth could contact him at any time if she needed anything. Staff 1 then sent Youth A a friend request for “SnapChat”. Staff 1 then asked Youth A to send nude photos via SnapChat. Youth A did not send any photos. However, Staff 1 sent a photo of himself in his underwear. It was further reported that on an unknown date Staff 1 text Youth A requesting “cuddles” after the death of his grandmother and breakup with his girlfriend. Youth A declined any contact with Staff 1. Staff 1 then blocked Youth A on SnapChat. Since that time, Staff 1 went to Youth A’s apartment and spoke with the other girls that live there. Youth A was uncomfortable with this. The girl’s apartment is a staffed Independent Living Plus (ILP) placement.

Program Director

Program Director was contacted by phone on 6/24/2022. Director was aware of the allegations and reported Staff 1 was placed on leave pending investigation. Director reported DHHS was notified of the allegation. DHHS completed a safety check at the IL house that afternoon and did not report any concerns.

House Manager

An interview was conducted on-site by DHHS and DCWL on 6/27/22. House Manager reported that she had contact with Youth A after hearing of the allegation. House Manager asked Youth A if she was ok and inquired on why she waited so long to report the incident to anyone. Youth A said it happened in February 2022, but she felt the problem would just go away. Youth A reported to House Manager that Staff 1 had messaged her on social media, asked for nudes, and sent a photo of himself without a shirt. Youth A also reported feeling uncomfortable with Staff 1 being at her house. House Manager clarified that Staff 1 does not work in the “girls house” where Youth A lives with three roommates. Staff 1 works two doors down in the “boys house”. However, as this is ILP, staff and youth have contact with one another and occasionally plan activities together.

Youth A

An interview was conducted on-site by DHHS and DCWL on 6/27/22. Youth A reported in February 2022 Staff 1 text her “if you ever need anything, I’m here for you”. Youth A responded, “ok, thank you”. Staff 1 then asked her to add him on SnapChat, which she did. Youth A stated she did not know the rules about staff and youth having contact. After adding him on SnapChat, Staff 1 immediately messaged her. The messages were friendly in the beginning. Then he began

sharing personal information, such as the fact his grandmother died. Youth A replied with condolences. Staff 1 then sent her a message stating he needed “cuddles” to feel better and wanted to see her. Youth A replied no. Staff 1 then apologized to her, through a video message in which he was wearing boxers and no shirt. Youth A did not respond. Staff 1 then asked Youth A to send nude photos; she replied no. Staff 1 then blocked Youth A on the SnapChat app. Youth A could not provide any of these messages as SnapChat messages disappear after reading. However, Youth A did show the message from Staff 1, requesting that she add him on SnapChat. Youth A stated that after he blocked her from the app, she confronted him using another app, but he pretended not to know what Youth A was talking about. Youth A showed the texts to DHHS and DCWL. In the messages, Youth A told Staff 1 he was being inappropriate. Staff 1 indicated he did not know what she meant. Since that time, Staff 1 has avoided her, but he does talk with other girls in her house. Youth A reported she has been confrontational toward Staff 1 as she is upset about the incident and does not want him to do that with any of the other girls in the house. Youth A recalled that she began arguing with Staff 1 recently, after he made a comment to another youth about Youth A being disrespectful. Staff 2 was present during the argument and asked Staff 1 to leave the house. Youth A reported the incident to Staff 3. Youth A also informed Staff 3 about the messages Staff 1 had previously sent. Youth A did not want to tell anyone before, as she felt she handled it and did not want him to get fired over it. After the argument, Youth A changed her mind and felt someone should know what happened.

Youth B

An interview was conducted on-site by DHHS and DCWL on 6/27/22.

Youth B reported she never observed any staff act inappropriately with youth. Youth B was unaware of any text or social media contact that was inappropriate or sexual in nature. Youth B reported Staff 1 has not worked in their house. However, she knew him as he worked in the boys IL house, which is part of their housing complex. The groups occasionally plan activities together. Youth B reported there is a group chat with all of the youth and staff to coordinate these activities. Staff 1 has not text Youth B individually. However, he has told youth in the group chat that they can contact him if they need anything.

Youth C

An interview was conducted on-site by DHHS and DCWL on 6/27/22.

Youth C reported she never observed any staff to act inappropriately with youth or to text or use social media for anything sexual in nature. Youth C reported being part of the group chat with youth and staff, which included Staff 1. Youth C was not aware of Staff 1 contacting any youth individually. However, Youth A once told Youth C that Staff 1 was upset with her for refusing to go out with him. Youth C did not know any other details and felt Youth A was lying about the situation. Youth C reported knowing Youth A for a long time, stating that Youth A exaggerates and is not truthful.

Youth D

An interview was conducted on-site by DHHS and DCWL on 6/27/22.

Youth D moved to the ILP house March 2022. Therefore, she was not part of the house at the time the incident allegedly occurred. Youth D denied observing any inappropriate actions by staff. Youth D did not have any concerns regarding Staff 1.

Youth E

An interview was conducted by phone with Youth E on 7/12/22. Youth E is placed in the boys ILP house and has worked closely with Staff 1. Youth E denied seeing Staff 1 have a close or inappropriate relationship with any youth.

Staff 2

An interview was conducted on-site by DHHS and DCWL on 7/7/22.

Staff 2 confirmed Staff 1 never worked at the girl's house. However, he did have contact with staff and youth at the house, as he worked at the boy's house, two doors down. Staff 2 stated she was not present when Staff 1 and Youth A were in an argument recently. However, she heard about it from Youth A. After telling Staff 2 about this incident, Youth A also told her about the text messages from Staff 1. Staff 2 did not see any of the messages from SnapChat. However, Youth A did show Staff 2 the texts with Staff 1, where Youth A said he was being inappropriate, but Staff 1 indicated he did not know what Youth A was talking about. Staff 2 reported that she did not have any concerns about Staff 1 and had not witnessed him being inappropriate with any youth. Staff 2 noted that Staff 1 seems close with all of the youth. However, she noticed he has been particularly helpful with Youth D lately, as Youth D is new to the program, has a baby, and does not speak English. Staff 2 did not find this suspicious but stated she will pay more attention and report if any interactions seem inappropriate.

Staff 3

An interview was conducted on-site by DHHS and DCWL on 7/7/22.

Staff 3 reported she is the supervisor of staff that work in the boys ILP home. Staff 3 was aware of the allegation but had never observed any inappropriate actions by Staff 1. Staff 3 did not have any concerns about Staff 1's behavior toward the youth in the girl's home. However, Staff 3 noted that Staff 1 had been very active in helping Youth D with her child. While this was unusual, it did not seem concerning. Staff 3 stated Staff 1 was on a corrective action plan as of March 2022 due to attendance issues. But there were no other concerns. Staff 1 worked well with youth and was very supportive. Regarding boundaries between staff and youth, Staff 3 stated the staff handbook outlines what is/is not acceptable. Staff and youth cannot be friends outside of agency work/activities and no social media contact except for the group chat with staff and youth. Staff 3 noted the agency is working on clarifying this policy.

Staff 4

An interview was conducted on-site by DHHS and DCWL on 7/7/22.

Staff 4 reported working several shifts with Staff 1. Staff 4 never observed any inappropriate behavior or relationships between Staff 1 and any youth. Staff 4 had not heard any youth report feeling uncomfortable around Staff 1.

Staff 5

An interview was conducted on-site by DHHS and DCWL on 7/7/22

Staff 5 reported being present during the incident where Youth A became upset and began yelling at Staff 1. Youth A was out of the room, then suddenly came in, yelling at Staff 1 for talking about her to a peer. However, Staff 1 was not talking about Youth A. Staff 5 stated Youth A frequently accuses people of talking about her, even when they are not. Staff 5 reported that Staff 1 did tell Youth A she was being immature and rude to staff. Which further upset Youth A. Staff 1 was not yelling or being rude when he said this. Staff 1 was trying to coach Youth A about how her behavior was seen by others. However, Youth A then began yelling about Staff 1 being “weird” with girls online. Staff 5 messaged her supervisor for assistance. Staff 5 denied witnessing any inappropriate action or relationships between staff and youth. Staff 5 reported Staff 1 has been very helpful with residents as he speaks Spanish, which helps him connect with youth. When asked about agency policy about staff/youth having contact on social media, Staff 5 reported the policy is unclear.

Staff 7

Staff 7 denied witnessing or hearing of any inappropriate contact between youth and staff. Youth A reported to Staff 7 that Staff 1 made her uncomfortable by some messages they exchanged. However, Staff 7 did not see the messages and had no other information.

Staff 1

An interview was conducted at Staff 1’s apartment by DHHS and DCWL on 7/7/22. Staff 1 was aware of the allegations and denied sending any inappropriate or sexual messages, or photos of himself in his underwear. Staff 1 reported there is a big group text on WhatsApp for staff and youth to communicate. However, some youth have used his phone number from the group chat to look him up on other social media apps and add him. Staff 1 reported he and Youth A were friends on SnapChat. Staff 1 stated Youth A sent him the request. However, after DHHS showed the screenshot of the request from him to Youth A, he agreed that he was the one who requested Youth A add him. Staff 1 did not have a reason for why he asked Youth A to connect via this app. However, he stated that the youth in the boy’s home, and other youth that have moved on from the program, contact him on SnapChat and Instagram as they are the most popular apps right now. Staff 1 stated he tries to connect with the youth in different ways and be available to them, as they are all refugees and do not have a support system. Many youth do not speak English, so he also helps them when there is a language barrier. When asked about Youth D, Staff 1 reported he has a good rapport with Youth D. Youth D has struggled with some staff and with the language barrier. Staff 1 has tried to help Youth D with understanding school, the IL program, and watching her child at the ILP house on occasion, so Youth D can have some time to herself. Staff 1 stated the agency does not have any clear rules about any of that, so he did not believe it was a problem. Staff 1 felt that Youth D was more comfortable with asking for him to

help, as he speaks her language and it is easier to communicate. Staff 1 stated he is only being helpful and nothing more. Staff 1 denied any type of relationship with Youth D or any youth.

Regarding Youth A, Staff 1 denied the allegations. Staff 1 reported Youth A always seemed upset with him and other staff, because she felt they were showing favoritism toward other youth, and not her. Youth A frequently seemed agitated and spoke rudely to staff. Staff 1 indicated she was more “entitled” with male staff and would swear at staff and tell them what to do. There was one incident recently where Youth A began yelling at Staff 1, in front of other youth. Staff 1 asked Youth A to stop, but she kept escalating the situation. Staff 1 told Youth A she was being disrespectful. Youth A became more upset, yelling, swearing, making rude comments. Staff 1 left the house to end the situation. Youth A later made this allegation about Staff 1. Staff 1 again denied the allegations. Staff 1 stated that he and Youth A had messaged briefly on SnapChat a few months ago. Youth A initiated the conversation, by asking him to take her shopping. Staff 1 told Youth A it would have to be during work hours. Youth A asked again and Staff 1 responded he was busy with work, college, and family obligations as the great-grandmother passed away. Youth A told him that she was there for him if he wanted to talk. Staff 1 said thank you, ended the conversation. Later that night Youth A text him again, asking what he was doing. Staff 1 answered he was going to bed. Youth A asked if he was still upset about his grandma, then again said she was there for him. Staff 1 denied sending any messages about cuddling. As SnapChat is a video messaging app, Staff 1 did send one reply to Youth A while sitting on his bed, but it only showed his face and shoulders, and he had a shirt on. Staff 1 stated there was nothing sexual or inappropriate about the messages. Staff 1 denied requesting nude photos from Youth A. Staff 1 stated he has not messaged with Youth A since that time.

Staff 1 reported the agency policy about social media is not clear. The employee handbook mentions relationships not being allowed but did not detail what type of contact was or was not ok, as staff build these supportive, mentoring relationships with refugee youth. Staff 1 reported being on leave from work and did not know when he would be returning. DHHS wrote a safety plan, which Staff 1 agreed to: no social media contact with youth, no photos to youth, and to notify supervisor of any perceived flirtation or weird contact from youth.

Documents reviewed

On 6/27/22 a site visit occurred at the agency. HR documents for Staff 1 were reviewed. Staff 1's file did not have documentation of any prior concerns related to this allegation. However, he was on a corrective action plan due to attendance issues. It was also noted Staff 1 signed agency policies/procedures from the employee handbook on 12/30/21.

The agency employee handbook was reviewed regarding staff and youth contact on social media. On page 12, the policy states “employees are responsible to use good judgement and exercise personal responsibility when posting online”. The policy

further stated that staff must not be “friends” with current or former clients on personal social media sites.

DHHS

A conference call occurred on 7/13/22, in which DHHS reported no findings regarding this allegation.

Incident #2

Program Director

Program Director was informed of allegation in person on 6/27/2022. Staff 6 was immediately placed on leave pending investigation.

Youth A

During the interview on 6/27/22, Youth A reported hearing information that a male youth (Youth E) in Independent Living, had sex with an employee (Staff 6). Youth A stated that the boys and girl’s houses had a skating event in June 2022. Youth E was invited to the event, even though he had recently moved out of the ILP house and into his own apartment with Youth F. During the skating event, Youth E told Youth A that he had sex with Staff 6. Youth E reportedly said they were going to have sex again that night after the skating event. Staff 6 was then observed giving Youth E a ride to his apartment after the event. Youth A stated she did not tell anyone as she thought they would not believe her. Youth A also reported that she did not get along well with Staff 6, as she felt Staff 6 did not like her and favored other youth. Staff 6 was Youth A’s assigned life skills coach, but never made time to meet with her. Staff 6 also told Youth A that she was rude and had an attitude, which made Youth A unwilling to work with Staff 6 anymore. Youth A also reported she did not get along well with Youth E due to some conflict they had several months ago. Youth A and Youth E were friends, until Youth E was rude towards her. Youth A stated she did not have any proof about a relationship with Staff 6 and Youth E but felt it should still be reported.

Youth B, C and D

Youths B, C and D did not report any concerns regarding Staff 6 and Youth E. Two of the youth were not placed in the ILP home until after Youth E left the program.

Staff 2

Staff 2 reported she did not observe any inappropriate behavior with Staff 6 and Youth E. Staff 2 stated Staff 6 was always assigned to work in the girl’s home. Youth E and Youth F were placed in the boys ILP house, but not willing to work with their assigned coach. Therefore, Staff 6 agreed to help Youth E and F find an apartment, sign a lease, gather items to furnish the apartment, and complete some other tasks. At the same time, Youth A was not getting along with Staff 6 and refused to participate in activities planned by Staff 6. Youth A felt she was not getting enough of the Staff A’s attention but would not acknowledge her part in the problem. Staff 2 stated she can see how Youth A may have felt at the time that Staff 6 was spending too much time with Youth E.

Staff 3, 4 & 5

During the interviews on 7/7/22, Staff 3, 4 & 5 did not report any concerns regarding Staff 6 or Youth E.

Staff 1

During the interview on 7/7/22, Staff 1 reported he had not heard anything regarding a relationship or inappropriate contact with Staff 6 and Youth E. However, he then recalled a time that seemed unusual, where he ran into Youth F at a taco stand one night. Youth F told Staff 1 that he had to get out of the apartment because he felt uncomfortable with Staff 6 being there with Youth E. Staff 1 stated this was on a weekend, late at night. Youth F did not provide any further details. Staff 1 stated he was aware that Staff 6 was not working that night. Staff 1 had just finished a shift and knew Staff 6 was not on duty. Staff 1 further stated there was another night when he drove by Youth E and F's apartment and observed Staff 6's car there, between 5-6PM. Staff 1 was unsure if Staff 6 was working that night. Staff 1 stated that the more he thought about it, Staff 6 and Youth E did seem close. Youth E would only accept help from Staff 6 and not any other staff. When Youth E graduated, he insisted on sitting with Staff 6 at dinner. Youth E would even refer to Staff 6 as his "girlfriend", although it was perceived as a joke. Staff 1 clarified that he never saw any inappropriate contact or conversation. However, Staff 6 and Youth E did seem close.

Staff 6

An interview was conducted by phone, by DHHS and DCWL on 7/12/22. Staff 6 reported being a Life Coach for the ILP program since November 2021. Staff 6 denied witnessing, hearing of, or participating in any inappropriate relationships with youth in the program. Staff 6 reported the agency does not explicitly state staff and youth cannot communicate via social media. Staff 6 reported asking agency leadership about adding youth on Facebook or maintaining contact after youth graduate the program. However, leadership did not have a concrete answer. Staff 6 stated the agency needs to clarify expectations because some youth need more attention and support as they do not have any friends or family in this country. Staff 6 clarified that she does not spend time with youth outside of her work hours. Staff 6 works 40 hours a week and flexes those hours to incorporate the time she assists youth that may be outside of the typical business hours.

Staff 6 was aware of an allegation towards her and indicated she was on leave pending investigation. Staff 6 denied the allegation, stating she was not sure why someone would say that. Staff 6 reported she and Youth E are close in a professional way. Youth E had a conflict with his assigned life coach, therefore Staff 6 stepped in to help with some tasks, since they had a good rapport. Staff 6 gave Youth E her personal phone number after he graduated and left the ILP program, as she felt he could use continued support. Youth E reached out to Staff 6 on her work phone to ask for help finding an apartment and other things. He once contacted her on her personal phone to ask for a ride when leaving a party, where his friends had been drinking. Staff 6 picked Youth E up and took him home around 11-11:30PM,

counting that time as work time. This occurred on a Saturday night in June 2022. Staff 6 stated Youth E initially called the ILP house staff for a ride, even though he was no longer in ILP, but no one answered. Which was why he called Staff 6. Staff 6 denied ever going to Youth E's apartment socially. Staff 6 helped Youth E and F obtain their apartment and move in one evening until approximately 11:00PM. Staff 6 reported that all of her contacts with Youth E were professional.

Staff 6 did not believe anyone thought she and Youth E had a relationship other than professional. Although she felt that Youth A may say this in an attempt to cause a problem. Youth A and Youth E do not get along. They were initially friends, until something unknown happened and Youth A's demeanor changed. Staff 6 stated Youth A is not someone to forgive and forget. Youth A will get a bad first impression and hold on to it. Staff 6 has observed Youth A yelling, swearing, and speaking rudely to Youth E and about him when he was not present. Staff 6 was also assigned as Youth A's life coach, but Youth A did not like the way that Staff 6 tried to coach her. Staff 6 tried to put responsibility on Youth A, while providing guidance to achieve tasks. Youth A seemed to not like Staff 6 or interacting with her. However, Staff 6 continued trying to work with Youth A. Staff 6 stated that it may appear she did not spend as much time with Youth A, as Youth A refused to engage in services.

Youth E

An interview was conducted by phone, by DHHS and DCWL on 7/13/22, as Youth E is unavailable in person most days from 5:00am to 5:30pm due to work. Youth E reported living in the ILP home for about a year. Youth E denied knowledge of, or involvement in any inappropriate relationships with staff and youth. When specifically asked about Staff 6, Youth E denied any type of relationship other than professional. Youth E denied any calls, texts, or photos on social media, outside of the agency group chat. Youth E denied having Staff 6 or any staff at his apartment socially. Youth E recalled Staff 6 helped him move in, and once gave him a ride home from a party when his friend at the party had been drinking. Staff 6 was at the apartment briefly to drop him off, but she did not stay long. Youth E stated he did not have a car at the time and tried calling ILP house staff, but they did not answer. Youth E has since obtained a car and does not need to ask staff for help. Youth E stated he occasionally spent time with other youth from the ILP house. Although he noted he did not have a good relationship with Youth A. Youth E and Youth A were friends previously, but she "changed". Youth E would say hello to Youth A and she would ignore him or become angry with him. Youth E stated he avoids Youth A because he does not want to argue with her. Youth E indicated he would never tell Youth A anything personal as they are not close that way. Youth E denied ever telling Youth A about a relationship with Staff 6.

Youth F

An attempt was made by DHHS and DCWL to complete a phone interview with Youth F on 7/12/22, as he was out of state. A message was left and Youth F later contacted DHHS. Per the DHHS worker, Youth F denied any knowledge of an inappropriate relationship between Staff 6 and Youth E, or any other youth and staff.

Youth F denied observing any staff or youth pushing boundaries; staff have always been professional and respectful with youth. Staff 6 helped Youth E and Youth F move into their apartment. But otherwise, no staff have been there. Youth F denied Staff 6 ever going to the apartment other than when she helped them move. Youth F denied telling any staff that Staff 6 was at his apartment or made him uncomfortable.

Staff 7

A phone interview was conducted on 7/12/22 by DHHS and DCWL. Staff 7 reported she did not have any knowledge of inappropriate relationships between youth and staff. However, Staff 7 stated she witnessed something unusual. Staff 7 recalled attending a beach outing with youth and staff, in which she observed Staff 6 and Youth E sharing a blanket. The blanket was spread out on the sand and they were both laying on it, close to one another. Although no improper contact was observed. Staff 7 thought it was unusual at the time but it did not seem inappropriate. After hearing of the allegation, Staff 7 reconsidered the situation and felt it may have been more than what she initially thought.

Documents reviewed

On 6/27/22 the human resources file for Staff 6 was reviewed at the agency. Staff 6 was hired in November 2021. Staff 6 did not have any disciplinary action, or documentation of concern regarding her performance. Staff 6 completed all new hire requirements and signed agency policies on 11/1/2021.

On 6/29/22 the Facebook profile for Staff 6 was reviewed. It was found Staff 6 and Youth E were “friends” on the app. Youth E had “liked” some of Staff 6’s photos and posts in May and June 2022.

The agency employee handbook was reviewed regarding staff and youth contact on social media. The policy states “employees are responsible to use good judgement and exercise personal responsibility when posting online”. The policy further stated that staff must not be “friends” with current or former clients on personal social media sites.

DHHS

A conference call occurred on 7/13/22, in which DHHS reported no findings regarding this allegation.

APPLICABLE RULE	
R 400.12206	Staff qualifications
	(1) An agency shall require a staff member who has ongoing contact with children or parents to be a person who has the ability, experience, education, and training to perform the duties assigned.

ANALYSIS:	No violation was found as there was no evidence to support staff had inappropriate relationships with youth.
CONCLUSION:	VIOLATION NOT ESTABLISHED

APPLICABLE RULE	
R 400.12202	Policy and procedures
	An agency shall have and follow written policies and procedures for all of the following: (e) Staff Responsibilities
ANALYSIS:	<p>Incident #1: Staff 1 violated agency policy by requesting Youth A as a friend on SnapChat.</p> <p>Incident #2: Staff 6 violated agency policy by having Youth E as a "friend" on social media.</p> <p>TECHNICAL ASSISTANCE: The agency was advised to review their policy regarding staff/youth contact and social media, to ensure it is clear and encompasses all aspects of their mentorship role and boundaries. The agency was advised to review this policy with youth on a regular basis and provide clarification for staff as needed. The agency was also advised to provide reminders to youth to contact the afterhours on-call staff, when they need assistance, and not to contact individual staff.</p>
CONCLUSION:	VIOLATION ESTABLISHED

IV. RECOMMENDATION

Upon receipt of an acceptable corrective action plan, I recommend no change in the license status.



Heather Reilly
Licensing Consultant

July 29, 2022

Date

Approved By:



July 29, 2022

Jessica VandenHeuvel
Area Manager

Date