

**Review**  
**of**  
**New England Kurn Hattin Homes**

**REPORT**

**May 12, 2021**

**Report to the Secretary of Education**

Submitted by:

AOE Review Team

Robert B. Stafford, Jr., AOE Investigator



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### **Exhibits**

- Exhibit 1 – Approved Independent School: General Education Application signed on May 8, 2017 by Executive Director Stephen Harrison**
- Exhibit 2 – New England Kurn Hattin Homes – Table of Organization – March 2021**
- Exhibit 3 – 2019 Residential Treatment Program Licensing Report**
- Exhibit 4 - VT Digger Article**
- Exhibit 5 - White Paper by Mark Bodin**
- Exhibit 6 - KH Child Experience Committee Description**
- Exhibit 7 – NEASC Letter**

## **Background**

In 1894 the New England Kurn Hattin Home for Children (KH) was founded by the Reverend Charles Albert Dickinson, who wanted to create a place of care and nurturing for children in difficult family situations. Since its founding, KH has become a year-round charitable, residential and day program, and home and school serving children in grades kindergarten through eight (ages 5 through 15) from throughout the Northeastern United States. Admission is based on a child's potential to benefit from a structured and supportive residential and educational program. KH's primary goal is to prepare children to rejoin their families and set them on a path for a successful and fulfilling future.

KH is a Vermont State Board of Education (VSBE) Approved Independent School and was last approved in 2017. (See Exhibit 1)

KH's current enrollment is 11-day students and 47-residential students. They report that most of their students attend the school at little to no cost, because approximately 95% of their operations are covered by some sort of charitable cause.

KH is located on 280 acres in Westminster, Vermont and has family style cottages that house groups of students based on gender and age. In addition, KH has an educational building, a gymnasium, recreational and athletic facilities, an outdoor pool, a farm, hiking trails and other outdoor educational areas that are located on school property. KH employs 80 staff, who are categorized into the following:

- |                       |                                     |
|-----------------------|-------------------------------------|
| ➤ Administration - 4  | Admissions - 2                      |
| ➤ Counseling - 2      | Development - 5                     |
| ➤ Education - 17      | Facilities - 8                      |
| ➤ Family Outreach - 1 | Farm - 1                            |
| ➤ Food Service - 8    | Health Services - 4                 |
| ➤ Horse Program - 1   | Human Resources - 1                 |
| ➤ IT - 1              | Program Services Administration - 1 |
| ➤ Residential - 24    |                                     |

KH is led by an Executive Director, whose responsibilities are to direct and coordinate all operational, administrative, and financial functions and who reports to the Board of Trustees. The Executive Director is responsible for all personnel decisions, to include hiring, staff discipline, and termination of employment. Reporting to the Executive Director is an Assistant Executive Director, who is responsible for the operation of the Children Services Department, which includes Academic Program, Accreditation, Admissions/Outreach, Athletics, Counseling, Food Services, Health Services, Residential Life, and Volunteer Programs. (See Exhibit 2)

Governance comes from a volunteer and elected 18-member Board of Trustees and up to 51 Incorporators. The five-member Executive Committee provides direction, guidance, and oversight to the Executive Director, who is the Board's sole employee.

### **Methodology**

AOE's rigorous review included collecting information through interviews, reviewing 3,500 plus documents, and directly accessing KH records management programs. The Review Team met weekly to discuss inputs received and determined next steps. This review was a work in progress until all information had been analyzed and summarized in this document.

### **Scope of Review**

In June of 2020 the Agency of Education (AOE) learned from the Department for Children and Families (DCF) that Kurn Hattin was no longer going to be licensed as a Residential Treatment Program (RTP). On September 10, 2020, DCF sent the KH Board President a letter indicating that KH's RTP License was closed. On September 20, 2020 VT Digger published an article titled, *'Culture of Abuse' Alleged at Kurn Hattin over 80 Years*. This news story chronicled historical sexual abuse that had occurred over decades.

After reviewing DCF's RTP Licensing Report (See Exhibit 3), the AOE learned from the report that KH was not complying with the following assurances required of an Approved Independent School:

9. Pursuant to 16 VSA § 563a, adults employed within your school have received orientation, information or instruction related to the prevention, identification, and reporting of child sexual abuse and sexual violence. Parents, guardians, and other interested persons have also been provided with opportunities to receive this information.
11. Pursuant to 16 VSA § 255, your school has filed a criminal records request for:
  - a. Any person a superintendent or headmaster is prepared to recommend for any full-time, part-time, or temporary employment;
  - b. Any person directly under contract to an independent school or school district who may have unsupervised contact with school children;
  - c. Any employee of a contractor under contract to an independent school or school district who is in a position that may result in unsupervised contact with school children;
  - d. Any student who is working toward a degree in teaching who is a student teacher in a school within the superintendent's or headmaster's jurisdiction.

The DCF report also noted a concern for lack of leadership for and supervision of Residential staff and students during their time in the residential setting. AOE independently verified these reports through an information sharing agreement with DCF.

In their RTP licensing report DCF said, “For example, three incidents occurring in February of 2019 and were not reported to licensing or Centralized Intake or Emergency Services (CIES) until April 2019.” DCF went on to say, “There are multiple incidents reviewed within 10 student files on SWIS (records management system) that should have been reported...,” indicating non-compliance with Assurance 9 above.

Further, DCF reported, “RTP Regulation 412 was rated as noncompliance because of the 18 background checks reviewed only 6 had current and completed fingerprint supported background checks,” indicating non-compliance with Assurance 11 above.

These reports of non-compliance by DCF, reports of inadequate supervision of staff and students, lack of contemporary operational policies, and the VT Digger article (See Exhibit 4) raised serious concerns about the ability of KH to ensure a healthy and safe environment for students. This led AOE Secretary Daniel French to appoint a Review Team to determine whether the identified concerns warranted action against KH’s independent school approval status by the VSBE.

This review was conducted pursuant to 16 V.S.A. § 166(b)(5) and VSBE Rule 2222.8, in response to the concerns referenced above. 16 V.S.A. § 166(b)(5) provides the VSBE with authority to revoke or suspend approval of an approved independent school, after the opportunity for hearing, for substantial failure to comply with the minimum course of study, for failure to comply with the Board’s rules for approved independent schools, or for failure to fulfill certain reporting requirements. Rule 2222.8 allows the Secretary of Education to appoint a Review Team in the event that the Secretary receives reports or complaints about an independent school concerning matters related to the approval standards and investigate such reports if warranted.

Pursuant to SBE Rule 2225.7, as part of the approval process, independent schools are required to provide evidence of compliance with local, state and federal requirements pertaining to the health and safety of pupils. The AOE’s authority is limited to the approval of an independent school’s educational program.

The Review Team members appointed by Secretary French to conduct this review included the following individuals:

- Twiladawn Perry, Lyndon Institute Head of School
- William Bates, AOE CFO

- Debora Ormsby, AOE Independent School Coordinator
- Clare O'Shaughnessy, AOE Legal Counsel
- Robert B. Stafford, Jr., AOE Investigator

In his January 6, 2021 letter to Review Team members, Secretary French identified two areas to be addressed by this review in light of the information received, particularly pertaining to KH being out of compliance with the requirements for reporting allegations of child abuse and neglect to DCF and being out of compliance with conducting background checks. Due to concerns we received about the lack of leadership and supervision of staff and students in the Residential setting, and the lack of staff training, the Review Team decided to include these additional areas of concern in our review. Even though AOE's authority is limited to the approval of an independent school's educational program, the Review Team believed in the context of a residential school where the majority of the students are residential students the educational program necessarily includes the Residential Program. After all, the residential students continued their studies during the afternoon and evening hours and in many cases used school issued information technology, such as Chromebooks, to aid them in their homework. The Team also decided that it was appropriate to review the time frame during the current Executive Director's tenure, which began in 2015. The scope of our review was from 2015 to current. The Team did not feel it was appropriate to hold current leadership responsible for legacy issues prior to 2015, if leadership was not in place at the school.

Because of restrictions brought on by COVID, the Review Team was not able to travel to KH for an onsite visit. Throughout this investigation KH was cooperative and responsive to the Review Team's requests.

This Report represents the work performed in connection with the requested review and summarizes the Review Team's findings and conclusions. It should not be considered or used as a comprehensive assessment of all aspects of KH's programs.

### **Findings**

The following was requested of KH:

1. Proof that prior to the arrival of students for the 2015/2016 through 2020/2021 school years and pursuant to Title 16 V.S.A. §563a, adults employed within Kurn Hattin received an orientation, information and instruction related to the prevention, identification, and reporting of child sexual abuse and sexual violence and that parents, guardians and other interested persons were provided with opportunities to receive this information.

2. Proof that prior to the arrival of students for the 2015/2016 through 2020/2021 school years, all Kurn Hattin teachers, staff and employees were trained in their roles as mandatory reporters, consistent with Title 33 V.S.A. §4913 and §4914.
3. All electronic and hand-written documents of physical and emotional abuse to students that were reported to Kurn Hattin's administration during the 2015/2016 through 2020/2021 school years, to include adult on student and student on student sexual assault and reports made to the Vermont Division for Children and Families (DCF). If the documents cannot be emailed to the AOE, then we will work with Kurn Hattin for Bob Stafford to gain access to Kurn Hattin's records management system to read (only) the requested information
4. Names of the designated employees for Kurn Hattin for the 2015/2016 through 2020/2021 school years who receive complaints of hazing, harassment, and bullying (HHB) as required by 16 V.S.A. §166(e) and 16 V.S.A. §570a.
5. Copies of Kurn Hattin's written policies for the 2015/2016 through 2020/2021 school years on the prevention of HHB of students and reporting abuse of children.
6. Proof that prior to the arrival of students to Kurn Hattin for the 2015/2016 through 2020/2021 school years, all teachers, staff, and employees participated in mandatory training on HHB, to include sexual harassment and sexual assault, consistent with Title 16 V.S.A. §570.
7. Proof that for the 2015/2016 through 2020/2021 school years Kurn Hattin provided their HHB Policy to students, custodial parents, and guardians.
8. Proof that for the 2015/2016 through 2020/2021 school years Kurn Hattin developed and initiated age-appropriate programs to inform students about the substance of their HHB policy and procedures in order to help prevent harassment, hazing and bullying.
9. Proof that for the 2015/2016 through 2020/2021 school years Kurn Hattin implemented the State Board of Education (SBE) Rule 4500-compliant policy for the use of restraint and seclusion, or Kurn Hattin's practices comply with Rule 4500 in the use of restraint and seclusion.
10. Proof for the 2015/2016 through 2020/2021 school years that Kurn Hattin followed the requirements in Title 16 V.S.A. §255. The AOE recognizes that Kurn Hattin cannot statutorily provide us with documents indicating whether or not a school employee has a criminal record. However, we know that we can audit (review) records that Kurn Hattin possesses to prove that they have conducted background checks on all individuals mandated by statute. The AOE will work with Kurn Hattin to provide Bob Stafford access to Kurn Hattin's computer system to read (only) the requested information requested in this paragraph.
11. A complete list for the 2020/2021 school year of Kurn Hattin's staff, to include a resume or curriculum vitae for each instructional staff member and a job description that includes the required degree, training, and experience for each instructional and support position.

12. A complete list of the residential support staff by name and their responsibilities assigned to each residential living facility, identifying the name of each building.
13. The number of students, including their grade level, assigned to each residential living facility.

KH provided the AOE with all the documents requested above and did so on all future requests. As previously mentioned, KH was cooperative and forthcoming throughout this review.

In preparing their responses to the aforementioned request, KH recognized the need to develop new policies and revise current policies to clearly direct staff as to roles, functions, responsibilities, and reporting requirements as mandatory reporters. These new and enhanced policies also provided direction to, and expectations of, students and their parents/guardians. These policies will address human errors around obtaining fingerprint background checks for staff and following State statute when complying with the requirements for reporting allegations of abuse and neglect to DCF. For example, KH's incident reporting system did not include a column to indicate whether the incident was reported to DCF. KH has added a column for the reporter to designate if they did report to DCF or any other agency, and to document the DCF Intake number. They also added a column in which to document who in management was notified of the incident and an obligation to provide a copy of the DCF report to the Assistant Executive Director. After reviewing DCF Intake reports and reviewing KH's incident reports, the Review Team independently verified DCF's finding that they were not in compliance with the reporting requirements for reporting child abuse and neglect.

The Review Team also independently verified DCF's finding that KH did not follow State statute by obtaining background checks on some employees. As already mentioned, KH's revised policies should address and prevent this issue from occurring in the future. They are currently up to date on their background checks. The Review Team acknowledges that KH has developed a process that will prevent future failure to assure that background checks are completed for staff. This will be accomplished through verification by administration and delineated in policy. The Review Team acknowledges policy changes alone are insufficient, but require consistent implementation and oversight.

In addition, KH identified the need to better memorialize its training program in writing and to develop a written plan to provide quality training to its staff. This policy included a list of mandatory trainings that employees are required to take, to include taking DCF's online Mandatory Reporter Training every year.

KH also developed and adopted a new written policy for training House Parents, who go through eight weeks of training prior to having unsupervised contact with children.



KH has reduced the student to Residential staff ratio to better supervise children in the Residential setting and to improve their safety and quality of the child's experience.

KH's staff training begins prior to the start of the school year with a five-week mandatory training. Upcoming training will include a session on Life Space Crisis Intervention, which is part of Positive Behavioral Intervention and Supports (PBIS) and speaks to effective de-escalation strategies, improving staff/student relationships, and diagnostic skills. Residential staff will also be included in this training. The instructor for the course will be Ken Kramberg, who is one of the few Master Trainers in Life Space Crisis Intervention. He will be assisted by Rutland Northeast Supervisory Union Superintendent Jeanne Collins.

During his interview for this review and in his *Governance and Oversight Enhancement Program* white paper (See Exhibit 5) that he submitted to the Review Team, KH's Board of Trustee's President Mark Bodin spoke to implementing organizational change at KH. He discussed strengthening governance by diversifying and strengthening the talent base of Trustees, who have expertise in higher education, independent schools, youth leadership, development, and legal issues. He spoke about raising the salaries and improving the benefits of current staff, so that KH is able to recruit and retain appropriately trained and qualified staff. He was instrumental in creating the Assistant Executive Director's position, which reduced the direct reports to the Executive Director and enhanced focus on other areas. He described mentoring the Executive Director and Assistant Executive Director on organizational structure, operational changes, strategic planning, culture, and morale. He discussed the renaming of the Child Experience Committee, which is involved in developing measures for key areas impacting the child's experience (See Exhibit 6). It appears that the Board President, if he stays in this position long enough, will be the catalyst and agent for organizational change.

Prior to the revelation of historical sexual abuse at KH and this review, KH was deeply invested in the Accreditation process with the New England Association of Schools and Colleges, Inc. (NEASC). Because of ongoing investigations, NEASC tabled the school's application for Accreditation. This means that unless these issues are resolved by September 2021, the NEASC Commission could take action to close KH's application, which could possibly mean that KH would have to begin the Accreditation process all over again (See Exhibit 7). As NEASC says "Member schools benefit from a structured process, grounded by research-based Standards, which helps them identify and prioritize areas for improvement, build on existing strengths, and map out short- and long-term plans for the future." NEASC Accreditation would be an additional layer of review on KH's ability to adhere to best practices for an independent school.

## **Limitations**

The Secretary has the discretion, where warranted, to investigate matters related to approval standards for independent schools. In this case, the allegations were related not to approval standards, but to reliance on assurances by KH in its renewal application related to “evidence of compliance with local, state and federal requirements pertaining to the health and safety of pupils.” As mentioned above, AOE investigated allegations by DCF regarding the failure of KH to conduct fingerprint supported background checks on employees and allegations of failure to comply with mandatory reporting of child abuse.

There was jurisdictional overlap and interplay between DCF’s regulatory authority over a RTP and AOE’s review of an independent school’s noncompliance with background checks and mandatory reporting requirements. This overlap is not delineated in statute or rule. The review revealed the vast majority of qualifying incidents (both reported and unreported incidents) occurred in KH’s residential program. When it comes to a failure to comply with mandatory reporting requirements, AOE’s regulatory authority is limited to licensed educators and administrators. Using the independent school’s assurances to the State Board in its approval application as the basis of AOE’s review required KH to prove it had adequate policies, procedures, and training for staff in place. In addition, KH had to prove they were appropriately supervising its staff to act in accordance with those policies, procedures, and training to comply with the law requiring background checks and mandatory reporting requirements.

The approval process for independent schools does not delineate an enforcement mechanism for an independent school’s failure to follow its own policies and procedures other than to report such to the VSBE for action on the school’s approval status.

During this review process, the AOE identified the requirements and KH administration recognized the failure to implement safeguards to ensure all employees with unsupervised contact with children completed background checks. KH administration also recognized its failure to adequately train and supervise employees on their duties as mandatory reporters. In response, KH instituted remedial measures to correct identified deficiencies in its policies, procedures, training, and supervision of its staff.

## **Conclusion**

The Review Team found increased scrutiny motivated KH to revise policies and procedures, reduce residential student to staff ratios, add additional oversight of day-to-day operation through the Assistant Executive Director’s position, and increase involvement of the Board of Trustees through active leadership by the Board Chair. The

Review Team found, with consistent implementation and ongoing oversight, KH can provide a safe and healthy environment for its students. Based on the evidence considered during the review, KH is playing an important role for students by providing an important blend of quality education and a responsive environment for children.

Respectfully submitted by:

*Bob*

May 12, 2021

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Robert B. Stafford, Jr., on behalf of Review Team members.

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Date



Attn: Independent Schools  
219 North Main Street, Suite 402  
Barre, VT 05641 (p) 802-479-1030 | (f) 802-479-1835

## EXHIBIT 1

### Approved Independent School: General Education Application

The *Approved Independent School: General Education Application* is required for all persons and entities desiring to operate an approved independent elementary or secondary school, pursuant to State Board of Education (SBE) Rule 2222. This application is specifically for:

- All first-time applicants for approval and
- All applicants seeking a general education-related amendment (additional grades or ages served, etc.)
- Applicants seeking renewal of approval who are **not currently accredited** by New England Association of Schools and Colleges (NEASC).

**Special Education Applicants:** All applicants who are also seeking Special Education approval, renewal, or amendment must complete and submit the *Approved Independent School: Special Education Application* concurrently with this document.

**NEASC School Applicants:** Please use the *Approved Independent School: NEASC Application*.

#### Completing the Application

The completed application may be submitted electronically and emailed as a Word document to [pat.pallasgray@vermont.gov](mailto:pat.pallasgray@vermont.gov); or may be printed, completed by hand, and sent by US mail using the above address. Please retain a copy for your records. Incomplete applications will not be processed.

Application must include:

- A completed copy of this form;
- A completed Table 7.1 describing the qualifications of your school's staff members (see section 7.1 for more information); and
- One or more of the SBE-required documents that provide evidence of financial capacity (see section 8 for more information).

**This application may be subject to disclosure under the Vermont Public Records Act, as codified at 1 V.S.A. § 315 et seq.**

#### Questions about the Application Process

Contact Pat Pallas Gray, [pat.pallasgray@vermont.gov](mailto:pat.pallasgray@vermont.gov), (802) 479-1199 for assistance.

1. School Information		Vermont Rule 2225.1	
School Name:	<u>New England Kurn Hattin Homes</u>	Head of School:	<u>Stephen Harrison</u>
Address:	<u>128 Mayo Rd.</u>	Title:	<u>Executive Director</u>
City/State:	<u>Westminster, VT</u>	Phone:	<u>(802) 722-3336</u>
Zip:	<u>05158</u>	Fax:	<u>(802) 722-3174</u>
Website:	<u>www.kurnhattin.org</u>	Email:	<u>sharrison@kurnhattin.org</u>

2. School Philosophy and Educational Objectives		Vermont Rule 2225.2, 2225.5
2.1	<p>2225.2: Briefly state the school's philosophy:  Our <b>Mission</b> of New England Kurn Hattin Homes for Children is:  <i>Kurn Hattin Homes transforms the lives of children and their families forever.</i></p> <p>Our <b>Core Values</b> are:  <i>Hope, Perseverance, Sense of Worth, Compassion, Nurturance</i></p> <p>Our <b>Vision</b> is:  <i>Given the uncertainty and lack of stability for so many children in the Northeast, Kurn Hattin seeks to provide children in need unparalleled wrap-around services and care to meet the social, physical, intellectual, cultural, emotional, and spiritual needs of children who attend. Kurn Hattin strives to be a place of healing, hope, and home – offering our children an alternative life trajectory toward personal fulfillment, success, and wholeness.</i></p>	
2.2	<p>2225.5: Briefly state the school's educational objectives:</p> <p>NEKHH seeks to provide a rich, child centered, and rigorous educational program for students with complicated family and socio-economic backgrounds. NEKHH believes that this “whole child” approach can be the foundation for a fulfilling and self-actualized life. To accomplish this goal the school utilizes an integrated academic program based on the Common Core State Standards (CCSS) and a wraparound residential program with many opportunities for enrichment and support.</p>	

For AOE Use Only
Reviewer notes:
Requests for additional information and/or revisions:

3. Student Enrollment	Vermont Rule 2225.3, 16 VSA §166(b)(4)

Briefly describe the school's enrollment. This could include any or all of the following information: enrollment by grade, enrollment by gender, total enrollment, DCF-licensed maximum enrollment, or any other demographic information that the school believes would provide student enrollment insights. If requesting an amendment to a current approval, include desired changes to enrollment.

Current Census:

98 total students. 88 Residential: 39 boys; 49 girls. There are 10 day students: 5 boys; 5 girls.

Grades: Num. enrolled:

K-1	8
2-	8
3-	6
4-	10
5-	12
6-	17
7-	17
8-	17

Is the school designed to serve children with a particular disability or with disabilities generally?

Yes No X

**For AOE Use Only**

*Reviewer notes:*

*Requests for additional information and/or revisions:*

#### **4. Governance**

**Vermont Rule 2225.4**

4.1	<p>Briefly describe your school's plan of organization, including its governance , faculty, and the student body:</p> <p><b>Administration</b> Kurn Hattin's daily operations are led by an Executive Director who is responsible for the direction of all administrative and staff functions including: Academics, Admissions and Family Outreach, Counseling, Development, Facilities and Grounds, Farm and Fleet, Health Services, Finance, Human Resources, Public Relations, and Residential Services. The Executive Director is ultimately responsible for all personnel decisions including hiring, staff discipline, and termination of employment.</p> <p><b>Governance</b> A volunteer, elected Board of Trustees and Incorporators, including an Executive Committee, provide direction, guidance, and oversight to the Executive Director within defined roles and functions. There are up to 18 members of the Board of Trustees augmented with around 35 Incorporators comprised of diverse expertise and geographical representation. While the Executive Director provides support, direction, and guidance to the Board of Trustees, the Executive Director is the Board's sole employee and answers to the Board.</p> <p>The Executive Committee is responsible for developing job performance criteria for the Executive Director and evaluating his/her performance annually. Additionally, the Executive Committee provides oversight, direction, and support to the committees and task forces endorsed by the Board of Trustees. Task Forces are created to</p>
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	<p>implement the various functions required by the institution and the strategic plan. Task Force membership is comprised of Trustees, Incorporators, Kurn Hattin staff, selected subject matter experts, and alumni.</p> <p><b>Student Body:</b> Kurn Hattin serves children (Grades K-8) who are affected by tragedy, social or economic hardship, or disruption in family life.</p>
4.2	<p>Provide the name and mailing address for the head of your governing board:</p> <p>Head of Governing Board: Janet Wilson – Board Chair Address of Governing Board: 208 Barnett Hill Road, Walpole, NH</p>
<b>For AOE Use Only</b>	
<i>Reviewer notes:</i>	
<i>Requests for additional information and/or revisions:</i>	

## 5. Minimum Course of Study and Required Assessments

*Vermont Rule 2225.5*

*16 VSA §§166, 906*

16 VSA §906 describes the minimum course of study as learning experiences adapted to a pupil's age and ability in the fields of: basic communication skills, including reading, writing, and the use of numbers; citizenship, history, and government in Vermont and the United States; physical and comprehensive health education including tobacco, alcoholic drinks, and drugs on the human system and on society; English, American, and other literature; the natural sciences; and the fine arts.

SBE Rule 2225.5 asks that an application for independent school approval or renewal include a description of the curriculum, methods of instruction, evaluation procedures, and special services which a school designed to achieve its educational objectives and to provide a minimum course of study in the following fields.

**With this in mind, briefly answer the questions below.**

Please note that the VT Agency of Education (AOE) is seeking to ensure that Vermont's independent school minimum course of study requirements are being met, without mandating independent school curriculum or instructional methodology.

Briefly describe your curriculum—what it is, and/or what it is derived from (examples: Common Core State Standards, the Vermont Framework of Standards, etc.) —for each of the following fields:

The following descriptions are intended to serve as brief overviews of the respective curriculum areas. The NEKHH school curriculum is based in large part on the Common Core State Standards (CCSS) and teacher/administrator designed programming. Central to the curriculum is the integration of academic disciplines and skills based class groupings. Further detail in all curriculum areas is available upon request.

a. Basic communication skills, including reading, writing:

ELA Curriculum

Our ELA curriculum is formulated to teach students to be responsive readers, thoughtful and articulate writers, and effective speakers.

5.1 Students write often and are encouraged to revise their work. Writing skills are emphasized through the use of text to support ideas. Creative writing opportunities allow students to write about personal experiences as they investigate various genres. Students learn to be more confident speakers through class discussions and public speaking presentations. Also, students learn and review grammar, mechanics, and vocabulary in each ability group. The No Excuses Writing Rules are utilized at all levels.

Core Curriculum Components:

Language - Grammar & Punctuation

Sentence Writing

Paragraph Writing

Essay Writing

Vocab - Wordly Wise/Spelling City Computer Program

Literary Elements

Poetry, Short Stories, Novels, Drama, Mythology



b. Mathematics:

The mathematics curriculum is rooted in the CCSS and utilizes many curriculum resources including the CPM Core Connections series (4<sup>th</sup> – 8<sup>th</sup> +) and Investigations (K-3, 17-18 school year). The curriculum is designed to develop the prerequisite skills needed for understanding in mathematics.

These include:

- Sequencing
- Spatial orientation/space organization
- Pattern analysis/recognition
- Visualization
- Estimation, (quantitative and qualitative)
- Deductive and inductive reasoning

Key Mathematics Milestones:

- Number conceptualization
- Place value
- Fractions
- Integers
- algebraic thinking
- geometry and spatial sense

(Based on the work of Mahesh Sharma)

c. Citizenship, history, and government in Vermont and the United States:

The social studies and history curriculum of the NEKHH School is based on Common Core State Standards (CCSS). The school provides a social studies curriculum for students that includes instruction in the history and culture of Vermont, the United States, and the world including major historical events, and the forces and personalities that shaped them. The social studies curriculum draws from the fundamental concepts of history, geography, economics, and government. The disciplines of psychology, anthropology, and sociology are used as frameworks for understanding.

Reasoning, civic participation, research, interpreting maps and globes, understanding time and chronology, analyzing controversial issues, composition, critical reading, and decision-making are taught and assessed. The content is drawn from local, state, national, and World areas. Methods and evidence include the use of small and large group discussions, simulation, case studies, role-play, media, questioning, independent study, and texts.

d. Physical education and comprehensive health education, including the effects of tobacco, alcoholic drinks, and drugs on the human system and on society:

Physical education is an integral part of the total educational process reflecting the belief that a sound mind exists in a sound body. Physical education is concerned with the development and growth of the “whole” individual- the intellectual, the physical, the social, and the emotional. Physical education goals include concern for the psychomotor, cognitive, and affective potential.

Students are made aware of the fact that they are responsible for their own actions so that they do not interfere with the learning of others, that they must actively listen, that participation takes team work, cooperation, consideration of others, and that they are to follow through with what they start

Through a varied curriculum in physical education an individual will have experience in movement, sports, games, gymnastics, physical fitness, lifetime recreational activities, and rhythm and dance. The ultimate goal is that physical activity will become a way of life.

Health Education is integrated into the NEKHH social skills curriculum. Kurn Hattin utilizes a social skills program for all grade levels based on National Health Education Standards (NEHS) and other social skills curriculum. This course is a full year class taught one a week by a team of community adults that include; teaching faculty, counseling staff, nursing staff, and house parents.

e. English, American, and other Literature:

Our ELA curriculum is formulated to teach students to be responsive readers, thoughtful and articulate writers, and effective speakers. Reading and literature instruction is tailored to the skill group and is based on the CCSS.

Students who have more needs in language receive 1:1 and small group reading intervention from 1-5 times per week (Title I and other reading intervention). The use of the Accelerated Reader Program and a Technology/Library curriculum (17-18 school year) are used at all grade levels.

Grade/skills level breakdown not included in this synopsis.

f. Science:

The CCSS based science curriculum covers the natural and physical sciences, including the principles of genetics, evolution, nutrition, life cycles, chemical elements and compounds, matter and energy, electricity, and Earth and space science. Instruction is centered on the scientific method and emphasizes the processes of observation classification, measuring, inferring, hypothesizing, problem solving and reasoning. Methods include experimentation, practical applications, the use of the natural and physical environment, and the use of Technology.

g. Fine Arts:

The K-8 Visual and Applied Arts curriculum is designed to promote a comparability of art experiences, development of small and large muscles, hand eye coordination, a finer sensitivity to tactile experiences, further right brain activity, inventiveness exploration, and emotional release.

The Art Curriculum is anchored by the concepts:

*Line*

*Color*

*Shape*

*Form*

*Texture*

*Pattern*

*Balance*

*Composition*

The above concepts are exercised by the following techniques and schema:

	<p> <i>Drawing</i>  <i>Painting making</i>  <i>Jewelry</i>  <i>Ceramics</i>  <i>Theater</i>  <i>Puppetry</i>  <i>Collage</i>  <i>Sculpture</i>  <i>Art History</i> </p>
5.2	<p>Briefly describe any additional special services (ex: supplemental instruction, enrichment or extracurricular activities, etc.) that you use to support the following content areas:</p> <p>a. Basic communication skills, including reading and writing:</p> <p>Kurn Hattin utilizes many additional supports to augment classroom instruction including Title I reading tutor support, SLP services through WNESU, various grant funded reading programs including the summer CLiF programs. In addition to these supports Kurn Hattin is fortunate to have many incredible and highly qualified volunteers to support the instructional program and library. Many of these volunteers are former teachers.</p> <p>b. Mathematics:</p> <p>Kurn Hattin utilizes flex scheduling to provide some small group and 1:1 math intervention groups for students in need. Various technology platforms are also used for extension activities and remediation.</p> <p>c. Citizenship, history, and government in Vermont and the United States:</p> <p>Individual support is available every day during teacher office hours. In addition to instructor time, many volunteers and administrators are available for extra support for all subjects.</p> <p>d. Physical education and comprehensive health education, including the effects of tobacco, alcoholic drinks, and drugs on the human system and on society:</p>

	<p>Kurn Hattin utilizes a social skills program for all grade levels based on National Health Education Standards (NEHS). This course is a full year class taught one a week by a team of community adults that include; teaching faculty, counseling staff, nursing staff, and house parents. School nurses and counseling staff are available to further assist student health education needs.</p> <p>e. English, American, and other Literature:</p> <p>Individual support is available every day during teacher office hours. In addition to instructor time, many volunteers and administrators are available for extra support for all subjects.</p> <p>f. Science:</p> <p>Individual support is available every day during teacher office hours. In addition to instructor time, many volunteers and administrators are available for extra support for all subjects.</p> <p>g. Fine Arts:</p> <p>Individual support is available every day during teacher office hours. In addition to instructor time, many volunteers and administrators are available for extra support for all subjects.</p>
5.3	<p>Briefly describe the methods of instruction that your school designed in order to achieve its educational objectives:</p> <p>The NEKHH utilizes small-skills based groupings with available individual support to help students engage with the curriculum. In addition to the school based educational model and interventions, NEKHH students benefit greatly from the consistency of the residential boarding school model. Each residential cottage has a consistent staff of house parents with established routines and structures surrounding the completion of, and engagement with independent work and reading time. Students are also able experience rich extracurricular activities that integrate with the school program including engagement with, a working farm, horse therapy program, sports programming, and creative arts. Every student at KHH is also assigned an individual counselor that provides guidance and as needed therapeutic support. The integration of this service is a crucial piece of the NEKHH model in working with at-risk K-8 youth.</p> <p><i>Counseling</i></p> <p>Individualized counseling is provided to children based on the level of need for each using empirically validated forms of treatment. Qualified counselors meet with each child and coordinate clinical and supportive services.</p> <p><i>Health Services</i></p> <p>Health care is provided based on individual needs as well. Children receive care from licensed nursing staff who meet with any child with medical needs; there is also a local pediatrician on call.</p> <p><i>Wide array of child-centered programs</i></p> <p>The children of the Homes participate in a wide array of strong, high-quality enrichment programs including music (both instrumental and voice), athletics, therapeutic horseback riding, numerous after-school offerings, the farm program (gardens, orchard, making apple cider, sugaring, etc.), and more. Additionally, there are extensive opportunities for events and activities on weekends, vacations, and particularly around the holidays</p>

	<p>(especially Christmas) that enrich the lives of our children and provide them with lifelong fond memories and useful skills.</p> <p><i>Family outreach</i></p> <p>Kurn Hattin provides an extensive family support service program that includes a full-time Outreach Coordinator, support group opportunities, a monthly informational newsletter, several on-campus family days each year, and short-term housing for family member visitation.</p> <p><i>Summer program</i></p> <p>A comprehensive eight-week summer program is offered each year. On-campus facilities are utilized along with other Northeast sites and programs to ensure children and their families of year-round service and support. This program takes full advantage of the outdoor recreational and farm program opportunities of Kurn Hattin.</p>
5.4	<p>How do you adapt your methods of instruction to reflect differences in students' ages and abilities?:</p> <p><i>Differentiated academic curriculum</i></p> <p>Our objective is to recognize each child's learning style and achieved level of learning to apply appropriate approaches to maximize their learning. Consequently, we utilize multi-aged skills grouping, hands-on learning techniques, differentiated lessons, and student-learning enhancement programs for our students.</p>
5.5	<p>Briefly describe the evaluation procedure your school designed in order to achieve its educational objectives:</p> <p>The NEKHH school utilizes many assessment tools to determine program effectiveness, student progress, individual student academic needs, and class groupings/schedules. Formative and on-going classroom assessment in small groups remains a key measure for determining needs and directing instruction for all KHH students. Additionally many classes utilize in-house assessments to determine skill needs and content mastery. Each spring the entire student body takes the California Achievement Test (CAT) to measure yearly progress and to aid in making class placement decisions for the following academic year.</p>
5.6	<p>How do you adapt students' learning experiences to reflect differences in students' ages and abilities?:</p> <p>The NEKHH school uses skills based groupings to better meet the needs of our students. Many KHH students do not have grade level skills in many academic areas and have often missed significant amount schooling due to family circumstances. Therefore the school uses formal and informal assessments in addition to school records to create age/grade groups with similar skills needs. Programming is then tailored to the group so that educational remediation and increased challenge can be added when and where needed.</p>
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Reviewer Notes:	
Requests for additional information and/or revisions:	

6. Facilities		Vermont Rule 2225.6
6.1	<p>Briefly describe your school's physical facilities. This could include a description of the facilities themselves, and/or a description of how they will be used in the provision of educational services and supports:</p> <p><i>Location and Campus</i></p> <p>Our 280 acres on a hillside in Vermont, overlooking the Connecticut River Valley offers an idyllic setting for our life together. Modern family-style cottages, an expansive educational building, recreational and athletic facilities, an outdoor pool, a farm, hiking trails and other outdoor education areas all combine in a campus designed to present children with tremendous opportunities for growth and development. The physical plant is monitored closely and is well-maintained in good to excellent condition.</p>	
6.2	<p>Briefly describe your school's materials and equipment. For example, this could include materials designated for educational use by staff and students: computer equipment and electronic tablets; books; science or lab equipment; recreational equipment; etc.</p> <p>The NEKHH school maintains the following equipment for the educational use of its students:</p> <ul style="list-style-type: none"> <li>-Science lab</li> <li>-Library and Media center (computer lab and several thousand books)</li> <li>-iPad program (approx. 20)</li> <li>-Laptop program (25)</li> <li>-Chromebook program (15)</li> <li>-In class desktop computer stations (approx 20)</li> <li>-Gym building with full complement of recreational equipment</li> <li>-Outdoor pool</li> <li>-Horse program associated equipment</li> <li>-Farm program associated equipment</li> <li>-School owned musical instruments (approx. 35)</li> <li>-Music Library</li> </ul>	
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Reviewer Notes:		
Requests for additional information and/or revisions:		

7. Professional Staff		Vermont Rule 2225.8
7.1	<p>Complete Table 7.1 at the end of this application, addressing the qualifications of each of your current professional staff members.</p>	

	(please see attached table)
7.2	<p>Briefly describe your school's expectations for the professional growth of its staff. This could include descriptions of how professional development opportunities are identified, approved, and evaluated for efficacy:</p> <p>Professional development is a highly valued and integral part of the NEKHH school. Faculty engage in many whole group and individual trainings each year to stay current in educational best practices. Generally, professional development needs are identified by faculty and administrators based on the short and long term needs of the school program and strategic plan. Individual teachers also have the opportunity to seek outside trainings to improve their practice and fulfill licensure requirements. Post-training processing and surveys have been used to determine the programs efficacy and alignment with stated goals.</p>
7.3	<p>Describe your school's in-service training(s). This could include information about in-service frequency, length, and/or content:</p> <p><i>Staff training and competency</i></p> <p>Kurn Hattin provides regular training to staff during the academic year plus five pre-session training days in August for the academic and residential staffs. A residential training program for new houseparent's lasts approximately six weeks. Our commitment to comprehensive initial and ongoing training and professional development ensures a competent and dedicated team of employees.</p> <p>Teaching faculty attend a week of in-service training before the school year begins in August. In-service is selected to meet program needs and is generally planned with faculty and administration input.</p>
7.4	<p>Describe the professional development of staff in the prior two years:</p> <p>During the 16-17 school year the school faculty have engaged a full educator institute delivered by the Upper Valley Educators Institute (UVEI). This PD was funded in part by a Title IIa grant. This year long institute has been focused on teacher collaboration and differentiated instruction. In the last two years faculty and staff also engaged in CPI training, CPR/First Aid, and a NEKHH hosted behavior training by Ross Greene, CPM Common Core math training, and various other PD trainings.</p>

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*Reviewer Notes:*

*Requests for additional information and/or revisions:*

## 8. Financial Stability and Capacity

**Vermont Rule 2225.9**

Provide evidence of financial capacity by attaching one or more of the following:

(Please see attached – Independent Auditors Report)

- An audit letter by a certified accounting firm from the present or prior year describing financial capacity;
- A notarized letter summarizing the financial status within the present or prior fiscal year signed by the board of directors or governing body;
- An audit from the present or prior fiscal year performed by a certified accounting firm;
- A statement of financial capacity of a private, state, or regional agency recognized by the State Board for accrediting purposes concerning the school's financial capacity

For more information about meeting this requirement, please consult the Secretary of Education's fiscal memo to independent schools, dated July 9, 2015. This memo is available to download from the Independent Schools page of the AOE website at [Secretary Holcombe memo regarding State Board action on independent schools](#)

**For AOE use only**

*Reviewer Notes:*

*Requests for additional information and/or revisions:*

## 9. School Calendar

**Vermont Rule 2225.10,  
2226.10**

Complete the following table and provide a copy of the school calendar and the weekly schedule.

**Number of days in session per school year**

179 (please see attached calendar)

**Total number of instructional hours offered per school year**

1074 hours

**For AOE use only**

*Reviewer Notes:*

*Requests for additional information and/or revisions:*

## 10. Assurances

Head of School: please sign below to assure the State Board of Education that:



1. Your school shall use the assessment or assessments required under 16 VSA §164(9) to measure attainment of standards for student performance for all publicly-funded students (16 VSA §166(g));
2. Your school shall provide the AOE data related to the assessment or assessments as required by the Secretary of Education (16 VSA §166(g));
3. Your school shall provide to the Secretary of Education, on October 1 of each year, the names, genders, dates of birth, and addresses of your enrolled students (Rule 2225.3; 16 VSA §166(b)(4));
4. Within seven days of the termination of a student's enrollment, the approved independent school shall notify the Secretary of Education of the name and address of the student (Rule 2225.3; 16 VSA §166(b)(4));
5. Your school has adopted a Harassment, Hazing, and Bullying Policy that is at least as stringent as the most current model policy or policies published by the Secretary of Education. This requirement is described further in 16 VSA §570;
6. Pursuant to 16 VSA §570, annually, prior to the commencement of curricular and co-curricular activities, notice of your school's policies for Harassment, Hazing, and Bullying are provided to students, custodial parents or student guardians, and staff and included in any publication that sets forth the comprehensive rules, procedures, and standards of conduct for the school.
7. Your school has implemented a Discipline Plan that includes, at a minimum, each of the following components:
  - a. The school's approach to classroom management and response to disruptive behavior;
  - b. The provision of information and training to students concerning conflict resolution, peer mediation, and anger management;
  - c. Procedures for informing and working with parents;
  - d. The school's response to significant disruptions, such as threats or use of bombs or weapons;
  - e. The periodic training of staff and contractors who routinely have unsupervised contact with students on the maintenance of the safe, orderly, civil, and positive learning environment;
  - f. A description of behaviors on and off school grounds that constitute misconduct;
  - g. Due process procedures for student suspension and expulsion.

These requirements are described further in 16 VSA §1161a;

8. Your school has implemented a State Board of Education (SBE) Rule 4500-compliant policy for the use of restraint and seclusion, or your school's practices comply with Rule 4500 in the use of restraint and seclusion;
9. Pursuant to 16 VSA §563a, adults employed within your school have received an orientation, information, or instruction related to the prevention, identification, and reporting of child sexual abuse and sexual violence. Parents, guardians, and other interested persons have also been provided with opportunities to receive this information;

10. Pursuant to 16 V.S.A. §255, your school has a current User's Agreement with the Vermont Crime Information Center (VCIC);
11. Pursuant to 16 VSA §255, your school has filed a criminal records request for:
  - a. Any person a superintendent or headmaster is prepared to recommend for any full-time, part-time, or temporary employment;
  - b. Any person directly under contract to an independent school or school district who may have unsupervised contact with school children;
  - c. Any employee of a contractor under contract to an independent school or school district who is in a position that may result in unsupervised contact with school children;
  - d. Any student who is working toward a degree in teaching who is a student teacher in a school within the superintendent's or headmaster's jurisdiction.
12. If your school offers student athletics programs, that it has developed and implemented a concussion action plan that is aligned with 16 VSA §1431, along with all other related requirements described in 16 VSA §1431;
13. Pursuant to Title 18 §1121 and Rule 2225.7, each student enrolling in your school, regardless of whether the student has been enrolled in the school during a previous school year, has provided the school with a record or certificate of immunization issued by a licensed health care practitioner or a health clinic that the person has received required immunizations appropriate to age as specified by the Vermont Department of Health. Exemptions to this Rule apply as described in VSA 18 §1122;
14. Pursuant to Rules 2225.7 and 2226.8, your school shall annually, on or before January 1, submit its standardized form containing the student body's aggregated immunization rates to the Department of Health;
15. Pursuant to Rule 16 VSA §1481, your school shall drill students so that they are able to leave the school building or perform other procedures described in the school's emergency preparedness plan;
16. Pursuant to Rule 16 V.S.A. §1481, a drill shall be held at least once a month during the school year, and a record of the date and time of the drill, together with the time consumed in completing the procedure, shall be open at all times for inspection by representatives from the Fire Safety Division of the Department of Public Safety or the Agency of Education.
17. If your school is a residential school, that it:
  - a. has a current copy of an annual fire safety inspection by the Department of Public Safety or its designee;
  - b. has a certificate executed by the inspecting entity, declaring satisfactory completion of the inspection and identifying the date by which a new inspection must occur, posted at the school in a public location;
  - c. shall provide a copy of the certificate to the Secretary of Education after each annual inspection;
  - d. shall pay the actual cost of the inspection unless waived or reduced by the inspecting entity;

18. Your school has a current Certificate of Occupancy for any facility(s) used for educational purposes (Rule 2225.6);
19. Table 7.1 represents a complete list of your school's current professional staff members (Rule 2225.8);
20. A resume or vita for each staff member are available for review by the AOE, upon request (Rule 2225.8);
21. A job description, including degree, training and experience required, for each professional staff position, are available for review by the AOE, upon request (Rule 2225.8);
22. Your school provides financial and other support to staff for professional development including inservice trainings (Rule 2225.8.2(2));
23. School staff meetings support your school in meeting its educational objectives (Rule 2225.8);
24. Copies of all publications distributed to applicants for admissions, including public relations materials, parent student handbooks, staff handbooks, policy manuals, informational brochures, etc., will be available for review by the AOE upon request (Rule 2225.11);
25. Pursuant to Rule 2225.11, if your school is a renewal applicant, that the following appear in at least one of the publications described in assurance 24 of this application, as required under 16 VSA §166 (b)(3), and that this information has been provided to parents and legal guardians:
  - a. A statement of the school's approval status
  - b. A copy of 16 VSA §166 (b)(3)

Name: [Click here to enter text.](#)

Signature: [Click here to enter text.](#)

Date: [Click here to enter text.](#)

## 11. Signatures

Head of School: by signing below, I hereby affirm I am an authorized officer or administrator of the applying school, and certify the information contained herein is true and accurate to the best of my knowledge.

Name: [Click here to enter text.](#)

Signature: [Click here to enter text.](#)

Date: [Click here to enter text.](#)

### For AOE use only

This school has met all of its state requirements for approval or renewal, and is ready to proceed to the SBE for review.

Name: \_\_\_\_\_

Initial: \_\_\_\_\_

	Date: _____
--	-------------



Attn: Independent Schools  
219 North Main Street, Suite 402  
Barre, VT 05641 (p) 802-479-1030 | (f) 802-479-1835

18. Your school has a current Certificate of Occupancy for any facility(s) used for educational purposes (Rule 2225.6);
19. Table 7.1 represents a complete list of your school's current professional staff members (Rule 2225.8);
20. A resume or vita for each staff member are available for review by the AOE, upon request (Rule 2225.8);
21. A job description, including degree, training and experience required, for each professional staff position, are available for review by the AOE, upon request (Rule 2225.8);
22. Your school provides financial and other support to staff for professional development including inservice trainings (Rule 2225.8.2(2));
23. School staff meetings support your school in meeting its educational objectives (Rule 2225.8);
24. Copies of all publications distributed to applicants for admissions, including public relations materials, parent student handbooks, staff handbooks, policy manuals, informational brochures, etc., will be available for review by the AOE upon request (Rule 2225.11);
25. Pursuant to Rule 2225.11, if your school is a renewal applicant, that the following appear in at least one of the publications described in assurance 24 of this application, as required under 16 VSA §166 (b)(3), and that this information has been provided to parents and legal guardians:
  - a. A statement of the school's approval status
  - b. A copy of 16 VSA §166 (b)(3)

Name: Click here to enter text.

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Signature: Click here to enter text.

*Stephen B. Harrison*

Date: Click here to enter text. 05/08/2017

## 11. Signatures

Head of School: by signing below, I hereby affirm I am an authorized officer or administrator of the applying school, and certify the information contained herein is true and accurate to the best of my knowledge.

*STEPHEN B. HARRISON*

Name: Click here to enter text.

*Stephen B. Harrison*

Signature: Click here to enter text.

05/08/2017

Date: Click here to enter  
Lt:XL

For AOE use only

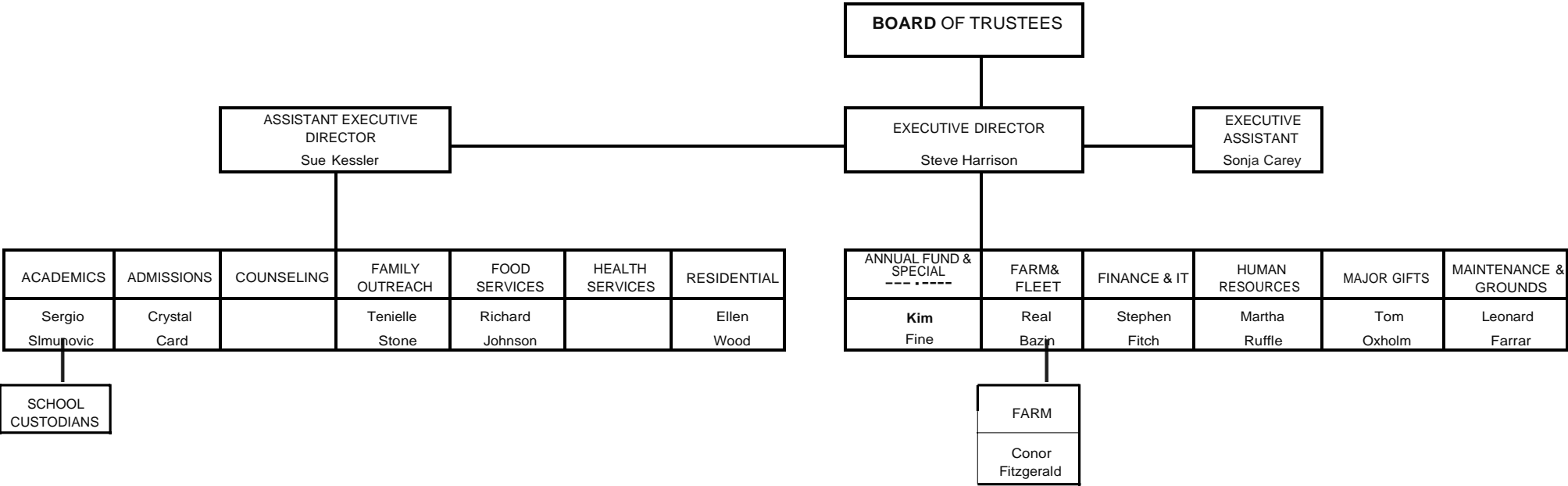
**This school has met all of its state requirements for approval or renewal, and is ready to proceed to the SBE for review.**

Name:

Initial:

EXHIBIT 2

New England Kurn Hattin Homes - Table of Organization - March 2021



## EXHIBIT 3

### RESIDENTIAL TREATMENT PROGRAM Licensing Report

Name:	New England Kurn Hattin Homes for Children	Original:	
Address:	PO Box 127; 708 Kurn Hattin Road	First Relicense:	
	Westminster, VT 05158	Renewal:	X
Telephone:	802-722-3336		
Website:	<a href="http://www.kurnhattin.org">www.kurnhattin.org</a>	Licensed Capacity:	108
		Gender:	M & F
Date(s) of Site Visit:	10/30/19; 11/1/19; 11/4/19; 11/6/19; 11/8/19; 11/21/19; 12/20/19	Age:	5 – 15yo
Licensors(s):	Lauren Higbee & Chris Ward		
<b>Methodology</b>			
Review: X Application Documents X Fire Safety Inspection documents X Minutes of Board Meetings X Communication logs X Medication logs X Evacuation drill logs X Secretary of State Website	Review: X Program Description X Program Policies & Procedures X Organizational Chart X Staff Roster/files/background Checks X Staff Schedules X Staff Training Records/Supervision X Client files	Interview: X Children/Youth X Parents X Supervisory & Direct Care Staff X Clinicians X Administrators X Collateral agencies/departments X Inspect physical facility(ies)	



## Program Summary:

New England Kurn Hattin Homes (Kurn Hattin) has been licensed as a Residential Treatment Program (RTP) since 1997. Residential Licensing and Special Investigations (RLSI) is tasked, in collaboration with Kurn Hattin, to determine the appropriate licensing body to provide oversight to the program. During this licensing review, the summary of Program Descriptions from various brochures and agency literature is included in this section to begin to answer that question.

Kurn Hattin's 2018 – 2019 Program Description describes themselves as, "A program of assessment, planning and service provides each child a chance to attain a life of civic and social responsibility through education, structured residential care, social skills training, recreational opportunities, and counseling. This is achieved through the collaborative efforts of administrators, educators, counselors, nurses, house parents, and other caring adults."

Kurn Hattin's Executive Director, Steven Harrison, provided RLSI with a copy of the agency's self-study report that was submitted to the New England Association of Schools and Colleges' (NEASC) Commission on Independent Schools as part of their accreditation process. This thorough self-study provided additional contextual information about the programming at Kurn Hattin. For example, in Standard 2 titled *Governance*, Kurn Hattin states, "The governance structure provides for a continuity of mission as each department works together to provide adequate services to help our children experience, safe, stable, nurturing environment in order to transform their lives into successful young adults." There was consistency in staff interviews to intentionally use the term "services" or to say the program provides services to children in their care as opposed to "treatment."

In Standard 4 regarding *Programming*, it states, "Kurn Hattin provides a comprehensive program of academic, social, and physical activities that foster the development of the whole child at each developmental stage. The program is designed to meet the needs of the children who are enrolled. It is planned, developed and researched by staff members who receiving training in trauma-informed care, attachment disorder, skills-based learning, and many other concepts that take into consideration the children we serve and their backgrounds."

Standard 5, *Experience of the Students*, explains "Kurn Hattin's target population is geared toward families of lower socioeconomic status and children who have likely experienced one or more adverse childhood experiences [ACES]. Direct care staff members are aware of the home situations that students have experienced and have received training in ACES and CPI [Crisis Prevention Intervention] in an effort to help them know how to best respond to students." In the section *Resources to Support the Program*, the discussion explains that "Many of our students arrive with profound social, emotional, and/or academic needs and significant trauma backgrounds." In the *Residential Program* section, the self-study states, "Kurn Hattin is a home for children first, and the school is part of the support system."

In the 2019 Annual Report, Mr. Harrison writes, "We seek to transform cycles of poverty, dysregulation, and dysfunction in children's lives, instilling in them the ability to enter the adult world as balanced, contributing members of civil society. We accomplish this through care and nurture, consistent structure, predictable treatment, de-escalation techniques, logical consequences, celebrations of success, and restorative practices —along with great fundamental education tailored for each child's needs as much as possible."

Through careful review of available information, RLSI concludes that Kurn Hattin operates in form and function as an educational program with boarding options rather than a traditional treatment-oriented RTP. However, as exemplified in the above program descriptions and review of admission records during this licensing term, the lines are blurred between what is advertised as "residential care" and what is construed by many as the provision of treatment for children with known trauma histories. It is precisely this intersection that has justified the ongoing regulatory oversight of Kurn Hattin as an RTP until this licensing review when program administration expressed a desire to function solely as an educational institution rather than RTP. In order for the cessation of DCF regulation to occur, Kurn Hattin must make clear and specific changes to their web-based advertising of their program description; admit only children and youth whose needs can be met within the program; notify primary referral sources of no longer being licensed by DCF; and continue to practice as mandated reporters with any incidents of suspected child abuse and neglect per Vermont statute.

## REGULATORY OVERSIGHT

	Compliance	
<b>101</b> A Residential Treatment Program shall not be operated without the formal prior approval of the Department for Children and Families, Residential Licensing Unit (hereafter "Licensing Authority").	C	
<b>102</b> A program, which was already operational before the need for a license was determined, may be considered to be in compliance if the program has applied for and is making satisfactory progress toward licensure.	C	

<b>103</b> A Residential Treatment Program shall allow the Licensing Authority to inspect all aspects of a program's operation which may impact children/youth.	C	
<b>104</b> A Residential Treatment Program shall allow the Licensing Authority to interview any employee of the program and any child/youth in the care of the Residential Treatment Program.	C	
<b>105</b> These regulations are not meant to supersede State or Federal mandates.	C	
<b>PROCEDURES</b>		
<b>106</b> An applicant shall apply for a license on a form provided by the Licensing Authority and provide requested information.	C	
<b>107</b> When a Residential Treatment Program has made timely and sufficient application for licensing renewal, the existing license does not expire until the application for renewal has been acted upon by the department.	C	
<b>108</b> A license may be issued with conditions when regulations have not been met, provided that the non-compliance does not constitute an unsafe situation or a major programmatic weakness and the program acts immediately to address the identified non-compliance.	C	
<b>VARIANCE</b>		
<b>112</b> A Residential Treatment Program shall comply with all applicable regulations unless a variance for a specific regulation(s) has been granted through a prior written agreement with the Licensing Authority.	C	
<b>113</b> A variance for specific regulation(s) shall be granted only when the Residential Treatment Program has documented that the intent of these regulation(s) will be satisfactorily achieved in a manner other than that prescribed by the regulation(s).	C	
<b>114</b> When a Residential Treatment Program fails to comply with the variance agreement, the agreement shall be subject to immediate cancellation.	C	
<b>RENEWAL</b>		
<b>115</b> Application for renewal of a Residential Treatment Program license shall be made in accordance with the policies and procedures of the licensing authority.	C	The application for this licensing period was received on 9/28/2018. Supplemental and collateral documentation has been updated since that date.
<b>CHANGES</b>		
<b>116</b> A Residential Treatment Program shall notify the Licensing Authority at least 60 days before any of the following: A substantial change in services provided or population served; A planned change in staffing pattern; A planned change in the Administration; A planned change of ownership and/or governance; A planned change of location; A planned change in the name of the Residential Treatment Program.	NC	See Comments Below
<b>117</b> A Residential Treatment Program shall notify the licensing authority as soon as the change is known, if any of the above-mentioned changes occur without prior planning.	C	
<b>REPORTING</b>		
<b>118</b> A Residential Treatment Program shall report any suspected or alleged incident of child abuse or neglect within 24 hours, to the Department for Children and Families, Centralized Intake Unit. (33 V.S.A., Chapter 49, §4913).	NC	See Comments Below
<b>119</b> A Residential Treatment Program will supervise and separate the accused individual(s) and the victim(s) whose behavior caused report to the Department for Children and Families unless or until otherwise instructed by the Special Investigation Unit and/or Residential Licensing Unit.	C	
<b>120</b> A Residential Treatment Program shall report incidents of sexual activity between residents, as defined in these regulations, within 24 hours to the Department for Children and Families, Centralized Intake Unit; (800) 649-5285.	NC	See Comments Below
<b>INVESTIGATIONS</b>		
<b>121</b> A Residential Treatment Program shall cooperate fully in investigations of any complaint or allegation associated with the program. This may include, but is not limited to the Department for Children and Families Special Investigations Unit, and the Licensing Authority.	C	
<b>NOTIFICATION</b>		
<b>122</b> A Residential Treatment Program shall immediately, or as soon as reasonable, report to the Licensing Authority incidents that could potentially affect the safety, physical or emotional welfare of children/youth within the program. Written report shall follow verbal report within 24 hours.	NC	See Comments Below
<b>123</b> Incidents of restraint which result in injury to a child/youth or staff member, requiring medical attention shall be reported in writing to the Licensing Authority as soon as possible, and not later than within 24 hours. (see regulation 657)	C	
<b>124</b> Incidents of seclusion which result in injury to a child/youth or staff member, requiring medical attention shall be reported in writing to the Licensing Authority as soon as possible, and not later than within 24 hours. (See regulation 666).	C	
<b>125</b> Residential Treatment Program shall report, verbally and in writing, within 24 hours to the Licensing Authority incidents where the program knowingly or negligently violates licensing regulations.	C	

**COMMENTS:**

RTP Regulation 116 is rated as noncompliance because RLSI was not notified when Nancy Richardson, Director of Residential Services was hired in June of 2018. RLSI first met Ms. Richardson as a result of an investigation commencement. She explained at that point that she was unaware of any regulations to be followed but was eager to learn and follow them. RLSI was made aware of an organizational change during a routine licensing visit. Sue Kessler, previous Director of Admissions, became the Assistant Executive Director in July 2019 to directly oversee all direct care and services to the students of Kurn Hattin. RLSI was also made aware of the expected changes in the Director of Residential Services position during a licensing debrief meeting.

RTP Regulations 118, 120, and 122 are all rated in noncompliance. Of the 17 child abuse and regulatory investigations during this licensing period, at least three were not reported within the required timeframe. For example, three incidents occurring in February 2019 and were not reported to licensing or Centralized Intake and Emergency Services (CIES) until April 2019. Staff interviews illuminated an instance in October 2019 where information was intentionally withheld from licensing regarding the division of Parent Cottage students into other cottages due to the inadequate staffing coverage. Multiple staff interviews have alleged that significant incidents within residential programming and timing had not been documented. At least two separate scenarios were noted. School-wide Information System (SWIS) began to hold all the Kurn Hattin School's incident reports as of 2015. There are multiple incidents reviewed within 10 student files on SWIS that should have been reported to RLSI but were not. These include incidents of sexual touching between students and other incidents that directly impact the health and safety of the students.

Most recently, licensing became aware of an intake where two siblings were placed at Kurn Hattin and the younger sibling alleged the older sibling raped her. These allegations were historical and did not occur at Kurn Hattin. However, these allegations and new investigation were not reported to licensing even though it clearly falls under RTP Regulation 120 and 122. During the licensing visit, RSLI reiterated that when disclosures are made, a call to CIES, the child's guardian, and licensing are three separate calls that all should be made consistently.

**200 GENERAL PROVISIONS**

THE RIGHTS OF CHILDREN/YOUTH AND FAMILIES		
<b>201</b> A Residential Treatment Program shall ensure children/youth the following rights: to be served under humane conditions with respect for their dignity and privacy; to receive services that promotes their growth and development; to receive gender specific, culturally competent and linguistically appropriate service; to receive services in the least restrictive and most appropriate environment; to access written information about the providers policies and procedures that pertain to the care and supervision of children, including a description of behavior management practices; to be served with respect for confidentiality; to be involved, as appropriate to age, development and ability, in assessment and service planning; to be free from harm by caregivers or others, and from unnecessary or excessive use of restraint and seclusion/isolation; to file complaints and grievances without fear of retaliation.	NC	See Comments Below
<b>202</b> A Residential Treatment Program shall ensure families and custodians the following rights: to access written information about the providers policies and procedures that pertain to the care and supervision of children, including a description of behavior management practices; to receive services with respect for confidentiality; to be involved in assessment and service planning; to give and to withhold informed consent; to be notified immediately or as soon as reasonable of any runaway, attempted suicide, suicide, or medical emergency requiring the services of an Emergency Room or hospitalization, death or any other seminal event in the life of their child/youth; to be notified within 24 hours following the restraint or seclusion of their child/youth; to file complaints and grievances without fear of retaliation.	C	
<b>203</b> A Residential Treatment Program shall document prohibitions and limitations regarding parental involvement in the child/youth's Plan of Care and review such prohibitions and limitations at least every 90 days.	C	

**COMMENTS:**

RTP Regulation 201 was found in noncompliance as a result of child and staff interviews, policy reviews, and incident reports. Kurn Hattin provided 5 students to be interviewed during this routine licensing visit. This number is a small proportion compared to their census of approximately 70 - 74 students, but licensing has interviewed many students over the last two years during regulatory and child abuse investigations. The students in the interviews said they feel safe at Kurn Hattin but there is a lot of bullying and "mean peers" that "hurt them." One student was hesitant to say they feel safe and explained that "when people say they are going to kill themselves, it makes me worry a lot." Most students interviewed had issues with the dress code policy, saying it was too strict and unfair. There were further issues with the hair policy that dye and extensions have to be within the "natural" hair color spectrum. All students had the belief that males are "forced to get haircuts" unless their parents take them home on Sundays or they get permission not to. One

student said that it is “easier to cooperate [and get the haircut] because I don’t want to get in trouble.” RLSI reviewed the Community Handbook and there is a policy about haircuts, but it did not seem to be as strict as the children interpreted.

The majority of the students we spoke to said they like Kurn Hattin and the trips they take and the opportunity to earn things. However, many students said they “look forward to leaving Kurn Hattin” both on the weekends and at the end of the school year. The students described many sports and afterschool activities to participate in, though described having limited time to do homework if they participate in sports. The students had positive remarks about accessing and seeing their counselors once per week. Older students who talked about counseling in their schedules also demonstrated great insight about their anxiety levels, stress levels, and managing their anger. One student said that they “blackout when angry” but listed their house parent, counselor, and school staff as people they can talk to for help. The feedback about house parents varied depending on cottages. Some students expressed being afraid of their house parent and this information was reflected back to Kurn Hattin Administration.

Child interviews also gave the impression that “you have to go to church unless you go home on the weekends.” This was reiterated by house parent interviews. Kurn Hattin provides religious education classes for Protestant and Catholic faiths 2x/month. Their Community Handbook states they will make arrangements for other classes or services for students with other faiths.

As of June 2019, the Kurn Hattin Board of Trustees approved a policy titled, “Gender-fluid Residential Placement Policy.” The policy concludes, “It is the considered opinion at Kurn Hattin that the primary determining factor is the privacy and safety of our children, both individually and collectively. With this in mind, the policy to be followed is that gender-fluid children will be placed according to biological gender rather than by potential gender-identity.” This directly connects to the noncompliance rating for RTP Regulation 201 because there needs to be greater education on what the best practices are for serving LGBTQ youth. The phrase “birth gender” is not supported by current research. It can be interpreted that Kurn Hattin is referring to the sex of the child at birth. Best practices support children being placed in cottages and programming where they feel most comfortable and safe in their current gender expression and Kurn Hattin’s policy does not reflect that flexibility.

Staff interviews identified an alarming instance where two house parents of color were told by other staff members that Mr. Harrison said they could not be house parents together because you have to “spread the black around.” RLSI followed up with the house parents and Mr. Harrison and this potentially occurred at the start of the 2018 – 2019 school year. There are some discrepancies in the stories each party provided and there are details and dynamics to investigate that go beyond RLSI’s role. RLSI recommends the Board of Trustees complete the investigation given that the concerns involve Executive Director. The noncompliance rating takes into consideration interviews with staff members who explained an unsaid occurrence that children are placed in certain cottages based on their racial identity. RLSI could not reconcile or confirm the reports of segregating practices in the cottages since Kurn Hattin’s policy places children in cottages based on age and sex.

Kurn Hattin’s NEASC self-study surveying resulted in the findings, “...that 21 percent of the students strongly disagreed that they felt safe at Kurn Hattin.” The program appears committed to exploring and greater understanding what this percentage means. However, staff members were candid to explain that children say they don’t feel safe when they are escalated or they do not feel safe based on the actions of their peers.

The totality of the student interviews, staff interviews, review of internal policies and self-study survey results all contribute to the noncompliance rating for RTP Regulation 201. The gender-fluid residential placement policy and rate of bullying and peer-to-peer regulatory and child abuse investigations limits Kurn Hattin’s ability to provide “gender specific, culturally competent and linguistically appropriate service” and for students “to be free from harm and caregivers or others.” These issues within Kurn Hattin and the findings that 21 percent of students strongly disagree that they feel safe at the program inhibits the students from being “served under human conditions with respect for their dignity and privacy.”

### 300 THE GOVERNING AUTHORITY

<b>301</b> A Residential Treatment Program shall be incorporated. If incorporated outside the State of Vermont, it shall secure authorization from the Secretary of State to do business in Vermont.	<b>C</b>	New England Kurn Hattin Homes is listed on the Secretary of State website with a Business ID of 0043694 in active status.
<b>302</b> The Governing Authority is ultimately responsible for all aspects of the Residential Treatment Program.	<b>C</b>	
<b>303</b> The Governing Authority shall make available to the Licensing Authority, upon written request, a list of directors and officers of the board.	<b>C</b>	
<b>304</b> The Governing Authority shall: Review major operational decisions; Have	<b>C</b>	

provisions which preclude both the fact and appearance of conflict of interest; Specify the terms of appointment or election of members, officers, and chairperson(s) of committees; Specify the frequency of meetings and attendance requirements; Prohibit board members from being paid members of the staff.		
<b>305</b> The Governing Authority of a Residential Treatment Program shall appoint a qualified administrator.	C	Steve Harrison, Executive Director
<b>306</b> The Governing Authority is responsible for ensuring the writing of an annual evaluation of the Program Administrator, based on the job description which delineates the responsibilities and authority of the Program Administrator.	C	
<b>307</b> The Governing Authority is responsible for assuring the Residential Treatment Program's continual compliance and conformity with the following: The program's stated goals and objectives; Relevant laws and/or regulations, whether federal, state, local or municipal, governing the operation of the Residential Treatment Program. This may include, but is not limited to Zoning; Department of Public Safety, Fire Prevention; Department of Health; Interstate and International Placement of Children; The Prison Rape Elimination Act of 2003.	C	
<b>308</b> The Governing Authority shall ensure: Development and on-going review of program policies and procedures; Development and review of annual budgets to carry out the objectives of the Residential Treatment Program; Any fund raising, community activity, publicity or research involving children/youth is conducted in a manner which respects the dignity and rights of children, youth and their families and complies with all relevant state and federal laws regarding confidentiality.	C	
<b>309</b> The Governing Authority shall require and review an annual report, written by the administrator of the program which evaluates the program in relation to the program description, with the goal of continuous quality improvement.	C	Kurn Hattin provided RLSI with their NEASC self-study report.
<b>310</b> The annual assessment shall identify indicators that measure the program's ability to deliver the services described in the program description. These indicators may consider (but are not restricted to) the following: The number and circumstances of planned discharges; The number and circumstances of unplanned discharges; Consumer feedback; Provision of adequate supervision as evidenced by all reports of child abuse, sexual contact between children/youth; Grievances heard, resolved and unresolved; Personnel actions taken; Staff turnover; and Employee satisfaction surveys.	C	

#### COMMENTS:

Kurn Hattin is private, non-profit institution that has ongoing committees to update their community handbook, policies and procedures. This year has been particularly self-reflective for the agency since they are applying for the New England Association of Schools and Colleges (NEASC) accreditation. This process generated a thorough self-study of the agency as a whole. The self-study was provided to RLSI by Mr. Harrison and RLSI was able to attend one day of the NEASC on-site review. There are preliminary findings from the site visit but the accreditation status of Kurn Hattin is not known at this time.

#### 400 PERSONNEL

GENERAL		
<b>401</b> A Residential Treatment Program shall not hire, or continue to employ, any person whose health, behavior, actions or judgment might endanger the physical or emotional well-being of the children/youth served.	C*	See Comments Below
<b>402</b> A Residential Treatment Program shall not hire, or continue to employ, any person substantiated for child abuse or neglect.	C	
<b>403</b> There shall be a sufficient number of personnel qualified by education, training and experience with sufficient authority to adequately perform the following functions: Administrative; Financial; Supervisory; Clinical; Case Management; Direct child care; Housekeeping; Maintenance; Food service; Maintenance of records.	C	
<b>404</b> A Residential Treatment Program shall have written job descriptions for all positions within the program, including lines of authority, which are accessible to all employees.	NC	See Comments Below
<b>405</b> A Residential Treatment Program shall ensure that direct child care employees have regularly scheduled hours of work.	C	
<b>406</b> A Residential Treatment Program shall establish policies governing employee conduct. These policies shall be designed to promote: Good role modeling; Adequate supervision of children/youth; The development of healthy relationships between adults, children/youth.	C	
QUALIFICATIONS		
<b>407</b> The credentials of the program administrator, directly responsible for the therapeutic milieu within the residential treatment program, regardless of job title will include at minimum: Master's degree in a relevant field <u>and</u> , Four years direct care, including supervisory experience in a residential treatment program or therapeutic setting for children and/or youth. <u>or</u> , Bachelor's degree in a relevant field <u>and</u> , Five years direct care, including two years supervisory experience in a residential treatment program or therapeutic setting for children and youth.	C	Steven Harrison, BA & Masters of Divinity

<b>408</b> The credentials of those providing supervision of direct care staff, regardless of job title will include at minimum: Master's degree in a relevant field <u>and</u> , One year experience providing direct care in residential treatment programs for children/youth. <u>or</u> , Bachelor's degree <u>and</u> , Two years experience providing direct care in residential treatment programs for children/youth. <u>or</u> , High School Diploma or GED <u>and</u> , Four years experience working with children/youth in residential treatment programs.	C	Sue Kessler, Assistant Executive Director, MS in Elementary Education; Nancy Richardson, Director of Residential Services, PhD in Germanic Studies
<b>409</b> The credentials of those providing direct care for children/youth, regardless of job title will include at minimum: Bachelor's degree <u>and</u> , 21 years of age <u>and</u> , Experience working with children/youth. <u>or</u> , High School Diploma or GED <u>and</u> , 21 years of age <u>and</u> , Two years experience interacting with children/youth. This may include, but is not restricted to camp counselor, coach, babysitting.	C	
<b>410</b> Individuals providing clinical services for children/youth and families shall have experience working with children/youth and families shall meet current Vermont licensing and certification requirements and professional standards.	C	Christine Reid, MSW, LICSW
<b>HIRING</b>		
<b>411</b> A Residential Treatment Program shall have written personnel policies and procedures for the hiring, orientation, training, supervision, evaluation, recognition, discipline and termination of employees.	C	
<b>412</b> Residential Treatment Program shall conduct background checks, upon hire and every three years thereafter, on all employees, board member/trustees, volunteers, student interns, and others who may have unsupervised contact with children/youth in the program. Minimally, the background checks shall include the Vermont Criminal Information Center, Vermont Child Protection Registry and the Adult Abuse Registry.	NC	See comments below.
<b>413</b> The results of background checks must be received and evaluated by the program administrator prior to the individual being hired and prior to having any unsupervised contact with children/youth. Documentation of completed background checks and administrative review must be maintained and available to licensing upon request.	C	
<b>EMPLOYEE ORIENTATION AND TRAINING</b>		
<b>414</b> A Residential Treatment Program shall have written policies and procedures for the orientation of new staff to the program. This orientation must occur within the first 30 days of employment and include, but is not limited to: Program description and population served; A tour of the facility; Overall program treatment philosophy and approach; Program philosophy of behavior management; Child/youth grievance process; Basic information about behavior children/youth may exhibit; Identification of early warning signs that indicate child/youth may become disruptive or aggressive and how these observations are to be reported; Professionalism in dealing with children/youth, families, and others; Confidentiality; Program policies and procedure relating to interventions employed by staff to prevent, deescalate, safely manage child/youth acting out behaviors; Roles and expectation of various personnel in preventing and responding to crisis situations; Documentation requirements; Working as part of a team; Policies regarding zero-tolerance for sexual abuse; Procedures for reporting suspected incidents of child abuse and neglect; Policies and procedures regarding runaway children/youth Policies and procedures regarding the acquisition, storage, administration, documentation and disposal of medication; Emergency response procedures; Emergency evacuation procedures; Residential Treatment Program regulations.	C	
<b>415</b> During orientation, each employee should be made aware of the plan for his or her particular on-going training and professional development. Plans should be developed between the employee and supervisor, and should be based on their roles and responsibilities in the program.	C	
<b>416</b> Staff who may work with children/youth shall receive training in the prevention and use of restraint prior to participating in the use of restraint. Staff will be competent in (but not limited to) the following: Relationship building, group processes, restraint prevention, de-escalation methods, avoidance of power struggles, and threshold for use of restraint; The physiological effect of restraint, monitoring physical distress signs and obtaining medical assistance, and positional asphyxia; Legal issues and idiosyncratic conditions that may affect the way children/youth and staff may respond to restraint (e.g., cultural sensitivity, age, gender, developmental delays, history of trauma, symptoms related to substance abuse, health risks, etc.), and; Escape and evasion techniques, time limits, the process for obtaining approval for continued restraints, the procedure to address problematic restraints, documentation, debriefing with children/youth, follow-up with staff, and investigations of injuries and complaints.	C	
<b>417</b> A Residential Treatment Program shall ensure supervisors and those who provide direct care receive on-going training and develop competencies relevant to the population served including (but not limited to): Relationship Building; Listening and communication; Family Engagement; Understanding and analyzing problem behaviors; Trauma informed practices; Positive behavior support; Designing and implementing routines; Setting clear limits; Praising and reinforcing behavior; Early detections of conflict situations; Interventions to minimize potential conflicts; Designing and implementing activity programs; Teaching social and anger management skills; Managing transitions; Managing personal boundaries; Harassment; Conflict resolution; First Aid and emergency medical procedures; Administration of medication and the documentation thereof.	C	The house parent training has been enhanced to reflect the changes in the program and to provide more support to the staff and more tools for them to use when managing the children in their cottages.

<b>418</b> A Residential Treatment Program shall ensure annual training for every employee responsible for direct child care effective de-escalation techniques, appropriate use of restraint, seclusion and expectations regarding the documentation of the use of restraint and seclusion.	C	
<b>EVALUATION</b>		
<b>419</b> A Residential Treatment Program shall conduct, at minimum, an annual performance evaluation based on performance expectations in the context of each employee's' job description and plan for on-going profession development.	NC	Performance evaluations for 2018 are mostly missing.
<b>420</b> The evaluation will identify areas of competence and document targets for growth and development to be reviewed at established intervals.	C	
<b>421</b> The evaluation will be signed by the employee and his/her immediate supervisor. There must be an opportunity for the employee to express his/her agreement or disagreement with the evaluation in writing. The employee shall be given a copy of his/her evaluation.	C	
<b>PERSONNEL FILES</b>		
<b>422</b> A Residential Treatment Program shall maintain a personnel file for each employee containing: The application for employment and/or resume; Documentation of reference checks; Employee's starting and termination dates; Applicable professional credentials/certifications; A signed job description, acknowledging receipt; Employee's plan for on-going training and professional development; Documentation of training; All annual performance evaluations; Commendations and disciplinary actions relating to the individual's job performance.	NC	Personnel files were missing resumes and job descriptions. Some job descriptions were used as performance evaluations but forms were inconsistent. See additional comments below.
<b>STAFF COMMUNICATIONS</b>		
<b>423</b> A Residential Treatment Program shall establish procedures to assure adequate communication and support among staff to provide safety, continuity and integration of services to the children/youth. This may include logs, shift notes, minutes of meetings, etc.	C*	See Comments Below
<b>VOLUNTEER SERVICES AND STUDENT INTERNS</b>		
<b>424</b> A Residential Treatment Program may utilize volunteers and student interns to work directly with a particular child/youth or group of children/youth under the supervision of an employee of the program.	C	
<b>425</b> Volunteers will not provide essential services which would otherwise be unavailable.	C	
<b>426</b> A Residential Treatment Program shall ensure that the needs and learning experiences of volunteers and student interns do not interfere with the care of children/youth.	C	
<b>427</b> Volunteers and interns are subject to the same background, character and reference checks as employees.	C	
<b>428</b> Volunteers shall receive training relevant to the work they will be doing and issues of confidentiality.	C	
<b>429</b> Student Interns shall receive training relevant to the work they will be doing, including (but not limited to) the training provided employees within the first 30 days of hire. See regulation 415	C	

#### COMMENTS:

RTP Regulation 401 was rated as Compliance with Reservations because of the concerns identified in the personnel file reviews, staff interviews, and child interviews. In documentation of personnel actions, at least four house parents were noted demonstrating concerning judgement and other staff had questioned their ability to appropriately manage student behavior and incidents that have occurred. The concerns of specific house parents were reiterated across Kurn Hattin departments. Performance evaluations of the house parents in question and review of documentation known to RLSI outlined a pattern of concerning behavior with children going back to at least 2015. The supervisor of one house parent shared that the house parent is "on our radar, but she's very strong." It is difficult to reconcile a house parent that is on the administration's radar for inappropriate behavior but still is considered a strong house parent. Another personnel concern demonstrated substantial negligence and the possible fraudulent documentation for administering medication. The totality of the personnel concerns was debriefed with Kurn Hattin leadership who provided additional contextual information and attested to further investigation into the matters.

The personnel files were generally in good order but content was inconsistent. RTP Regulations 404, 419, and 422 are rated as noncompliance because files were missing resumes and job descriptions and some performance evaluations (mostly from 2018). Some of the documented performance evaluations used a form titled Job Descriptions to evaluate staff performance but actual job descriptions were not always found in the file. There were also many medication errors documented in individual personnel files. This practice of documenting individual child medical information in personnel files will need to be reviewed.

RTP Regulation 412 is rated as noncompliance because of the 18 background checks reviewed only 6 had current and completed fingerprint-supported background checks. Out-of-state child abuse registry checks were not checked for any

employee in order to be in compliance with FFPSA. The NEASC self-study noted, "It regularly takes 30-45 days to receive fingerprinting results from the Sheriff's Department, which means that employees sometimes begin working before their background check is complete, but most problems are discovered via the on-line VCIC system before the employee begins work." This lends RLSI to infer that staff are potentially alone with children before their full background check results are received. RLSI spoke with the Director of Human Resources, Martha Ruffle, to begin a process of obtaining information from current and prospective employees of any state they have lived in within the last 5 years. It was shared with RLSI that HR received directive from the Executive Director not to follow the background check changes of FFPSA. Yet, in a meeting to start this licensing visit iteration, Mr. Harrison said he had not received notification about the background check requirement changes.

The House Parents have recently received a substantial raise in their compensation and an enhanced introductory training process as explained by Assistant Executive Director, Sue Kessler. This is aimed at retaining high quality staff and recruiting better candidates for the house parent role. All staff interviewed presented an overwhelming concern about the leadership and supervision house parents are receiving which lends a rating of compliance with reservations for RTP Regulation 423. Most staff connected a lower census at the Kurn Hattin to the "staffing issue" and "house parent situation." House parents were excited about the additional training offerings by the Counseling Department and raved about the increase in compensation. When asked about the supervision they receive 1:1, the majority responded that they have to ask for 1:1 time. When RLSI met with house parents in mid-November, one said they had 1:1 supervision with their supervisor three times since the school year started.

## 500 TREATMENT AND CASE MANAGEMENT SERVICES

### PROGRAM DESCRIPTION

<b>501</b> A Residential Treatment Program shall have a written program description, accessible to prospective residents, parents, custodians, placing agencies and the general public upon request.	C	
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<b>502</b> The program description shall include: Description of the population served; Criteria for admission; Exclusionary criteria; Description of the milieu; Description of the treatment modalities; Description of the clinical services provided; Description of the educational services provided.	C*	See Comments Below
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### CASE RECORDS

<b>503</b> A Residential Treatment Program shall have written policies and procedures for protection of the confidentiality of all children/youth's records.	C	
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<b>504</b> A Residential Treatment Program shall maintain record(s) for each child/youth. The content and format of these records shall be uniform within the program and minimally include: The name of the child/youth; Gender; Date of birth; Date of Admission; Legal custody and custodianship status; Informed consent signed by the parent(s) and custodian to provide emergency medical treatment and for the administration of medication; Contact information for the parent(s), caretakers; Documented acknowledgement from the child/youth, parent(s) and custodian that they have been informed of the program's policies and procedures regarding the use of restraint and seclusion; Informed consent signed by parent(s) and custodian regarding the policies and procedures guiding the use of restraint and seclusion that may occur while the child/youth is in the program; De-escalation intervention plan; Referral and Intake information; Treatment/clinical records; Education records; Cumulative medical records including date and results of last physical and dental examinations; Plan of Care, amendments and reviews; Incident Reports; Discharge Plan; Date of Discharge; and Contact information of the person or program to which the child/youth was discharged.	C*	See Comments Below
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<b>505</b> When information is in the possession of another person or agency and unavailable to the program, the program shall document attempts to acquire that information.	C	
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<b>506</b> A Residential Treatment Program shall establish policies and procedures regarding the retention, storage and disposal of records.	C	
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### REFERRAL/ADMISSION PROCESS

<b>507</b> A Residential Treatment Program shall accept a child/youth into care only when a current intake evaluation has been completed. The evaluation shall include information and assessments regarding the family, the child/youth's developmental, social, behavioral, psychological, and medical histories, allergies and any special needs.	C	
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<b>508</b> A Residential Treatment Program shall accept and serve only those children/youth whose needs can be met by the services provided by the program.	NC	See Comments Below
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<b>509</b> A Residential Treatment Program shall have written referral and admission policies and procedures.	C	
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<b>510</b> A Residential Treatment Program shall ensure that the child/youth, his/her parent(s) and custodian are provided reasonable opportunity to participate in the admission process and decisions, and that due consideration is given to any questions/concerns.	C	
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<b>511</b> A Residential Treatment Program shall provide children, youth, families and	C	
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custodians upon placement a clear and simple written statement that includes: The procedure used to report complaints or grievances, including timelines and accessible reporting formats; Assurance that the complaint may be submitted to someone other than the individual named in the complaint; Assurance that retaliation will not be tolerated; An opportunity for the child, youth, family member, custodian or staff member to present his or her version of events and to present witnesses; A process for informing the complainant of the results; A process for appeal; Contact information for the licensing authority; and Contact information for the State-designated protection and advocacy system.		
<b>512</b> A Residential Treatment Program shall ensure that upon placement, each child/youth is asked if he/she has any physical complaints and is checked for obvious signs of illness, fever, rashes, bruises and injury. The results of this interview shall be documented and kept in the child/youth's record.	C	
<b>513</b> Depending on the age, gender and needs of the child/youth an inventory and/or search of a child/youth's belongings as part of the admission process activity will be conducted by a same gender staff person as the child/youth being admitted and in the child/youth's presence.	C	
<b>514</b> A Residential Treatment Program shall obtain the written informed consent of a child or youth, their parent(s) and custodian before the child or youth is photographed and/or recorded for research and/or program publicity purposes.	C	
<b>515</b> A Residential Treatment Program shall assign a staff member to orient the child/youth and his/her parent(s) and custodian, to life at the program; including a verbal review of emergency evacuation procedures, the child/youth's rights and program expectations.	C	
<b>516</b> A Residential Treatment Program shall make available to each child/youth, parent(s), and custodian, a simply written list of rules and expectations governing children/youth's behavior.	C	
<b>517</b> The program will inform the child/youth, parent(s) and custodian of the policies and procedures regarding the use of restraint and seclusion. While this orientation will include the following content, the mode of delivery is dependent on the population served. Explanation of de-escalation techniques staff members may employ to defuse the situation in an attempt to avoid the use of restraint or seclusion; Description of situations and criteria for the use of restraint or seclusion; Who is authorized to approve and initiate the use of restraint or seclusion; A description of the restraint techniques authorized for use; A viewing of rooms used for seclusion; The protocol for the monitoring of the child/youth's health and well-being during the restraint, including time frames; The protocol for supervision and monitoring of the child/youth's health and well-being while secluded, including time frames; The decision-making process used by staff for the discontinuation of the use of restraint or seclusion; The internal grievance procedure to report inappropriate use restraint or seclusion; and Contact information for the Licensing Authority.	C	
<b>518</b> A Residential Treatment Program will obtain written acknowledgement from the child/youth, parent(s) and custodian that they have been informed of the program's policies and procedures regarding the use of restraint and seclusion.	C	
<b>519</b> A Residential Treatment Program that uses restraint or seclusion shall offer the child/youth, parent(s) and custodian the opportunity to provide information about the child/youth that may help prevent the use of restraint and seclusion.	C	
<b>520</b> A Residential Treatment Program shall gather and assess the following information to develop an individualized de-escalation plan for each child/youth to avoid the use of restraint and seclusion. The child/youth's history of violence; The child/youth's history of suicidal ideation or attempts; Events that may trigger aggressive or suicidal behavior; Techniques to regain control, self regulate, self-sooth that have been successful in the past; Preexisting medical conditions or physical disabilities that place the child/youth at increased risk of harm, and History of trauma that places the child/youth at increased risk of psychological harm if he/she is restrained or secluded.	NC	See Comments Below
<b>PLAN OF CARE</b>		
<b>521</b> A Residential Treatment Program shall develop a Plan of Care based on the review of the referral information and input from the referral source, the child/youth, parent(s) and custodian within seven days.	C	Student Support Plans are generated within the appropriate timeframes.
<b>522</b> The Plan of Care shall include: Reason for Admission, Preliminary Goals and Objectives; Services/Interventions to be provided, by whom, and frequency; How progress will be measured; Family contact and level of involvement; Mental Health status; Physical Health status; Social Skills; Family relationships; Recreation/Activities/Interests; Education; Activities of daily living/Independent living skills; De-escalation Intervention Plan; Plan for discharge; Aftercare planning.	NC	See Comments Below
<b>523</b> Plans of Care shall be signed by the administrator of the program (or designee).	C	
<b>524</b> A Residential Treatment Program shall demonstrate child/youth, parental and custodial participate in the development of the Plan of Care.	C	
<b>525</b> A Residential Treatment Program shall review and revise the Plan of Care at least once every 90 days and shall evaluate the degree to which the goals have been achieved, identify successful interventions, progress toward discharge planning and recommendations.	C	

<b>526</b> A Residential Treatment Program shall ensure that the Plan of Care and subsequent revisions are explained to the child/youth, his/her parent(s) and custodian in language understandable to everyone.	C	
<b>527</b> The current Plan of Care shall be available upon request at the time of discharge.	C	

**COMMENTS:**

RLSI focused on the admissions process and child file reviews due to the ongoing practice that Kurn Hattin is admitting students that need a higher level of treatment than what is provided at the program. The admissions committee has a representative from nursing, residential, school, counseling, and admissions. Student file reviews indicated that not all admission recommendations from student interviews are followed. For example, a recommendation of the Director of Counseling to not admit a 6-year-old with significant attachment issues was overturned by the former Director of Admissions and the child was admitted. One student had 28 incidents within 9 months of admission. The incidents included defiance, assault of another student, assault of a staff, and self-harm statements. The admission packet had two reviewers recommending no admission and that the student would "not be a good fit with a 1:10 ratio" but she was still admitted.

RTP Regulation 504 is found in compliance with reservation because gaps were identified in the main children files reviewed. Topical information is housed in different locations on campus, for example, medical information remains with the nursing department, educational information is kept with the school and incident reports remain online. Student Support Plans (SSPs) are routinely updated within the 90-day requirement. However, RTP Regulations 520 and 522 are noted in noncompliance because all SSPs list that de-escalation plans are not needed. In March 2018, Executive Director, Steve Harrison stated de-escalation plans are not needed and he saw "...no need to waste my staff's time writing unnecessary individualized plans..." Additionally, discharge information is repetitive and every student's is the same and places responsibility on the parent to plan accordingly.

A document dated September 2018 titled, "Reasons for Student Placements" of the student census, 72 were listed as having a "challenging home environment," 29 students had "mentally or physically ill parent or relative," and 20 students had "substance abuse at home." In the New England Kurn Hattin Homes for Children 2018 – 2019 Program Description's Criteria for Admission states, "ability to interact positively with peers and function well in a residential setting with no overnight awake supervision...Children with demonstrated significant anti-social behaviors (fire-starting, running away, etc.) or educational needs outside of the scope of our academic program generally are not admitted." There are multiple examples where children were exhibiting behaviors that are "outside the scope" of the program but were admitted and relates to RTP Regulation 508 noncompliance finding.

Significant child file review examples are detailed here to outline the noncompliances in this section. Of the child files reviewed, diagnoses listed were ADHD, ODD, CD, MPDD, depression, and anxiety and were prescribed psychotropic medications. Some challenging behaviors listed in admissions packets described anger issues, externalizing problems, runaway tendencies, suicidal ideations, rule-breaking, and a history of school suspensions for touching other kids. The children and families reported histories of sexual abuse, physical abuse, and witnessing domestic violence. Multiple students have placement histories at Howard Center's Jarrett House and the Brattleboro Retreat psychiatric inpatient unit. One student file reviewed demonstrated a psychiatric hospitalization in April and the child was admitted in June. This information along with that listed above lends a rating of in compliance with reservations to RTP Regulation 502, because the program is not adhering to its own program descriptions.

The new Director of Counseling, Christine Reid, holds a small caseload of clients since counselor, Kathy Allen, retired and the administration decided not to fill that position. This further highlights the incongruence between the ongoing recommendations by RLSI to balance the treatment and service criteria for children admitted with that of the treatment and services Kurn Hattin is providing. Staff are saying that they cannot adequately meet the needs of students, children are saying they do not feel safe, the profile to the child files reviewed are of children with complex trauma and substantial mental health needs. Kurn Hattin acknowledges the imbalance of accepting youth whose needs they cannot meet in the *Enrollment* section of the self-study stating, "In the effort to help as many children as we possibly can, sometimes children are enrolled who require a great deal of individual attention. This can take time away and resources away from other students."

**600 RESIDENTIAL LIFE**

SUPERVISION		
<b>601</b> A Residential Treatment Program shall provide adequate supervision appropriate to the treatment and developmental needs of children/youth.	NC	
<b>602</b> A Residential Treatment Program shall ensure that each child/youth has ready access to a responsible staff member throughout the night.	C	

<b>603</b> A Residential Treatment Program shall provide adequate overnight supervision consistent with the needs of the children/youth.	NC	
<b>FAMILY INVOLVEMENT</b>		
<b>604</b> A Residential Treatment Program shall make every possible effort to facilitate opportunities for children/youth to communicate with parent(s), siblings, and custodian to foster permanent relationships with family, in accordance with the Plan of Care.	C	
<b>605</b> Alternative visiting hours shall be provided for families who are unable to visit at the prescribed times, consistent with the Plan of Care.	C	
<b>606</b> A Residential Treatment Program shall not use family contact as an incentive to elicit desired behavior; likewise family contact shall not be withheld as a consequence for misbehavior.	C	
<b>607</b> A Residential Treatment Program shall have written procedures for overnight visits outside the program which includes; The child/youth's location; Length of stay; Plan for transportation; Plan for conveying medication; Discussion of medication regime; Recommendations for supervision; Name, address and contact information for person responsible for the child/youth while they are away from the program; Relationship to the person responsible for the child/youth; Plan for the unforeseen return of the child/youth, and Documentation of above activities.	C	
<b>608</b> A Residential Treatment Program shall not place a child/youth in a foster home unless the Residential Treatment Program is also a licensed Child Placing Agency.	C	
<b>EDUCATION</b>		
<b>609</b> A Residential Treatment Program shall ensure that every child/youth is provided an appropriate educational program in accordance with state law and approved by the Vermont Department of Education.	C	Kurn Hattin is an approved, independent school through the Agency of Education (AOE).
<b>DAILY ROUTINE</b>		
<b>610</b> A Residential Treatment Program shall follow a written daily routine, including weekends and vacations.	C	
<b>611</b> Daily routines shall not conflict with the implementation of a child/youth's Plan of Care.	C	
<b>COMMUNICATION AND PRIVACY</b>		
<b>612</b> A Residential Treatment Program shall permit children/youth to send and receive mail, make telephone calls and e-mail, consistent with the Plan of Care.	C	
<b>613</b> Program staff shall read a child/youth's mail and e-mail or listen in on telephone conversations only with the child/youth's full knowledge and understanding of the reasons for this action, consistent with the Plan of Care.	C	
<b>614</b> A Residential Treatment Program shall not bar contact between a child/youth and their parent(s), custodian, attorney, <i>guardian ad litem</i> , clergy and State-designated protection and advocacy system.	C	
<b>615</b> When the right of a child/youth to communicate in any manner with any person outside the program must be curtailed, or monitored a residential program shall: Document the decision, including who was involved in the decision-making process, reasons for limitations of his/her right to communicate with the specified individual(s); Inform the child/youth of the decision making process; Review this decision minimally at each review of the Plan of Care.	C	
<b>MONEY/FINES</b>		
<b>616</b> A Residential Treatment Program shall permit children/youth to access his/her own money consistent with his/her Plan of Care.	C	
<b>617</b> Fines shall not be levied except in accordance with a written Program Description which includes a description of how revenues from fines are used for the benefit of the children/youth residing in the program.	C	
<b>CHORES</b>		
<b>618</b> The Residential Treatment Program may assign chores that provide for the development of life skills and not used as punishment.	C	
<b>619</b> Children/youth participation in chores shall not be a substitute for housekeeping and maintenance staff.	C	
<b>RELIGION</b>		
<b>620</b> A Residential Treatment Program with religious affiliation(s) or expectations for participation shall include such information in the program description.	C	
<b>621</b> A Residential Treatment Program shall make every effort to accommodate a child/youth's desire to attend and/or participate in religious activities and services in accordance with his/her own faith.	C	
<b>PERSONAL BELONGINGS</b>		
<b>622</b> A Residential Treatment Program shall ensure that children/youth have his/her own adequate, clean, and appropriate clothing.	C	
<b>623</b> A Residential Treatment Program shall allow children/youth to bring his/her personal belongings to the program e.g. comfort items, memorabilia.	C	
<b>624</b> Limitations on the quantity of personal items shall be discussed during the referral/admission process.	C	
<b>625</b> Provisions shall be made for the protection of children/youth's personal property.	C	

<b>626</b> Any search of a child/youth's personal belongings for contraband deemed necessary for the safety of the child/youth or others within the program will be conducted in the presence of the child/youth, by same gender staff as the child/youth unless contraindicated and documented.	C	
<b>PERSONAL CARE AND HYGIENE</b>		
<b>627</b> A Residential Treatment Program shall ensure children/youth receive guidance in healthy personal care and hygiene habits.	C	
<b>FOOD SERVICES</b>		
<b>628</b> A Residential Treatment Program shall ensure that a child/youth are provided at least three nutritional meals, available daily at regular times.	C	
<b>629</b> There shall be no more than 14 hours between the evening meal and breakfast, unless nutritional snacks are offered during the evening.	C	
<b>630</b> No child/youth in a Residential Treatment Program shall be denied a meal for any reason, except by a documented doctor's order.	C	
<b>631</b> No child/youth shall be required to eat anything they do not want to eat, nor there be consequences for food preferences.		
<b>632</b> Special dietary needs shall be discussed during the referral/intake process and the Residential Treatment Program shall make healthy accommodations for children/youth with special dietary needs.	C	
<b>MEDICAL CARE</b>		
<b>633</b> A Residential Treatment Program shall ensure a routine physical examination by a medical practitioner for each child/youth within 30 days of admission unless the child/youth received such an examination within 12 months prior to admission.	C	
<b>634</b> A Residential Treatment Program shall have written procedures for staff members to follow in case of medical emergencies, including the administration of first aid.	C	
<b>635</b> A Residential Treatment Program must ensure that children/youth receive timely, competent routine and emergency medical care when they are ill or injured and that they continue to receive necessary follow-up medical care with parent(s) and custodians' consent.	C	
<b>636</b> A Residential Treatment Program shall maintain a cumulative record of medical care. This record shall include: The name of the resident; The reason for the visit; Name and contact information for the provider; Results of examination, tests and recommendations; Medication(s) prescribed; The time and date the medication is administered.	C	
<b>DENTAL CARE</b>		
<b>637</b> A Residential Treatment Program shall make reasonable effort to ensure each child/youth has had a dental examination by a dentist within 30 days of the child/youth's admission unless the child/youth has been examined within 6 months prior to admission and the program.	C	
<b>638</b> Residential Treatment Program shall make reasonable effort to ensure children/youth receive timely, competent routine and emergency dental care and that they continue to receive necessary follow-up dental care.	C	
<b>ADMINISTRATION OF MEDICATION</b>		
<b>639</b> A Residential Treatment Program shall have written policies and procedures governing the use and administration of medication to children/youth.	C	
<b>640</b> Policies and procedures governing the use and administration of medication shall be disseminated to all staff responsible for prescribing and administering medication.	C	
<b>641</b> These policies shall specify who can administer medication, under what circumstances and procedures for documenting the administration of medication.	C	
<b>642</b> A Residential Treatment Program shall ascertain all medication a child/youth is taking when coming into care and obtain parental and custodial consent for the administration of medication and any changes in medication(s).	C	
<b>643</b> Medication will be administered as prescribed by a licensed practitioner.	C	
<b>644</b> Medication errors shall be documented on an incident report.	C*	Medication errors are currently being held in personnel files.
<b>PETS</b>		
<b>645</b> A Residential Treatment Program shall have written policies and procedures address the presence and supervision of pets in the program.	C	Policies are outlined in the staff handbook.
<b>646</b> A Residential Treatment Program will ensure that the presence of any pet does not have an adverse effect on any child/youth residing in the program, for example allergies or fear.	C	
<b>647</b> A Residential Treatment Program will maintain a separate record on each pet that includes: Identifying information; Owner(s) contact information; Record of vaccinations; Record of registration; Statement of good health from a Veterinarian; Veterinarian's contact information and; Incidents involving the pet, for example if the pet is abused by a child/youth, or if the pet bites a child/youth or staff member.	C	
<b>BEHAVIOR MANAGEMENT</b>		
<b>648</b> A Residential Treatment Program shall prohibit all cruel, severe, unusual or unnecessary practices including, but not limited to: Strip searches; Body cavity	C	

searches; Restraints that impede a child/youth's ability to breathe or communicate; Chemical restraint; Mechanical restraint; Pain inducement to obtain compliance; Hyperextension of joints; Peer restraints; Locked buildings, rooms, closets, boxes, recreation areas or other structures from which a child/youth can not readily exit; Discipline or punishment which is intended to frighten or humiliate a child/youth; Requiring or forcing a child/youth to take an uncomfortable position, such as squatting or bending, or requiring or forcing the child/youth to repeat physical movements; Spanking, hitting, shaking, or otherwise engaging in aggressive physical contact (horseplay) with a child/youth; Physical exercises such as running laps or performing push-ups; Excessive denial of on-grounds program services or denial of any essential program services; Depriving a child/youth of meals, water, rest, or opportunity for toileting; Denial of shelter, clothing, or bedding; Withholding of personal interaction, emotional response or stimulation; Exclusion of the child/youth from entry to the residence; Any act defined as abuse or neglect by 33 V.S.A., Chapter 28, §4912.		
<b>649</b> A Residential Treatment Program shall ensure that behavior management is not delegated to persons who are not known to the child/youth.	C	
<b>PHYSICAL RESTRAINT</b>		
<b>650</b> A Residential Treatment Program shall not use any form of restraint without prior approval of the Licensing Authority.	C	Kurn Hattin uses CPI though restraints are very rare in the program.
<b>651</b> Restraint shall be used only to ensure that immediate safety of the child/youth or others when no less restrictive intervention has been, or is likely to be, effective in averting danger. Restraint shall be used only as a last resort.	C	
<b>652</b> Any restraint lasting more than 10 minutes requires supervisory consultation, approval and oversight.	C	
<b>653</b> Any restraint lasting more than 30 minutes requires clinical/administrative consultation, approval and oversight.	C	
<b>654</b> Restraint shall never be used for coercion, retaliation, humiliation, as a threat of punishment or a form of discipline, in lieu of adequate staffing, for staff convenience, or for property damage not involving imminent danger.	C	
<b>655</b> A Residential Treatment Program shall develop and implement written policies and procedure that govern the circumstances in which restraint is used. These policies and procedures shall contain and address the following: The threshold for initiating restraint; Forms of restraint that are permitted; Staff members authorized and qualified to order or apply restraint; Procedures for monitoring the child/youth placed in restraint for signs of discomfort and medical issues; Time limitations on the use of restraint; The immediate and continuous review of the decision to restrain; Documentation of the use of restraint; Record keeping of incidents of restraint; Debriefing with the child/youth; Debriefing with all witnesses; Debriefing staff; Notification of parent(s) and custodian; and Administrative review of all restraints.	C	
<b>656</b> Incidents of restraint shall be reported to the parent(s) and the person legally responsible for the child/youth as soon as possible, and not later than 24 hours.	C	
<b>657</b> Incidents of restraint which result in injury to a child/youth or staff member, requiring medical attention shall be reported in writing to the Licensing Authority as soon as possible, and not later than 24 hours.	C	
<b>SECLUSION</b>		
<b>658</b> A Residential Treatment Program shall not use any form of seclusion without prior approval of the Licensing Authority.	N/A	Kurn Hattin does not use seclusion.
<b>659</b> Seclusion shall be used only to ensure that immediate safety of the child/youth or others when no less restrictive intervention has been, or is likely to be, effective in averting danger.	N/A	
<b>660</b> Children/youth in seclusion will be provided constant, uninterrupted supervision by qualified staff, employed by the program and familiar to the child/youth.	N/A	
<b>661</b> Seclusion lasting more than 10 minutes requires supervisory approval and oversight.	N/A	
<b>662</b> Seclusion lasting more than 30 minutes requires clinical/administrative consultation, approval and oversight.	N/A	
<b>663</b> Seclusion shall never be used for coercion, retaliation, humiliation, as a threat of punishment or a form of discipline, in lieu of adequate staffing, or for staff convenience.	N/A	
<b>664</b> A Residential Treatment Program shall develop and implement a written policies and procedures that govern the circumstances in which seclusion is used. These policies and procedures shall contain and address the following: Circumstances under which seclusion may be used; Staff members authorized to approve the use of seclusion; Procedures for monitoring children/youth in seclusion; Time limitations on the use of seclusion; The immediate and continuous review of the decision to use seclusion; Documentation of the use of seclusion; Record keeping of incidents of seclusion; Debriefing with the child/youth; Debriefing with all witnesses; Debriefing staff; Notification of parent(s) and custodian; and Administrative review of all restraints and follow up actions taken.	N/A	
<b>665</b> Incidents of seclusion shall be reported to the parent(s) and person legally responsible for the child/youth as soon as possible, and not later than within 24 hours.	N/A	
<b>666</b> Incidents of seclusion which result in injury to a child/youth or staff member,	N/A	

requiring medical attention shall be reported in writing to the Licensing Authority as soon as possible, and not later than within 24 hours.		
<b>DOCUMENTATION</b>		
<b>667</b> Each incident of restraint and seclusion shall be documented separately by staff members directly involved in the intervention as soon as possible, not later than 24 hours.	C	
<b>668</b> This incident report written by the staff members shall include: Name, age, height, weight, gender and race of the child/youth; Date, beginning and ending time of occurrence; A description of what happened; including what activity the child/youth was engaged in prior to the escalation, the precipitating events; Description of de-escalation and less intrusive methods of intervention used and reasons for their use; Supervisory, clinical and/or administrative notification and approval; Staff involved, including full names, titles, relationship to the child/youth and if a restraint, date of most recent formal de-escalation and restraint training; Witnesses to the precipitating incident and subsequent restraint or seclusion; Preventative actions that may be taken in the future; Name of person making the report; Detailed description of any injury to the child/youth; Detailed description of any injury to staff members; Any action taken by the program as a result of any injury.	C	
<b>669</b> Incident Reports shall be reviewed and signed by the supervisor/administrator within 8 hours. Documentation of the administrative review must include follow up actions which may include: Debriefing with child/youth; Debriefing with witnesses; Debriefing with staff; Medical needs; Identified need for additional training; or Personnel action (if warranted).	C	
<b>RESTRAINT AND SECLUSION MONITORING</b>		
<b>670</b> A Residential Treatment Program will establish documentation and monitoring systems, enabling all incidents of restraint and seclusion to receive administrative review. The data and management systems will have the potential to monitor staff, individual, and critical programmatic involvement in incidents. The program shall track the following: Shift; Location; Day of the week; Time of day/night Incident antecedents; Length child/youth was held in restraint or seclusion; Type of restraint or seclusion; Age; Gender; Ethnicity; Number of incidents per child/youth; Staff members involved; Child/youth injuries requiring medical attention; and Staff injuries requiring medical attention.	C	

#### COMMENTS:

RTP Regulation 601 is rated in noncompliance based on child and staff interviews, results from regulatory and child abuse investigations, and reviews of incident reports. It is clear that there is inadequate supervision in the cottages. One house parent cannot meet the needs of all the students residing in their cottages. This remains true even with the cottages running below their census capacity. Historically, Kurn Hattin has been licensed for 108 students with a total of 9 cottages. It is important to note that equals a staff to child ratio of 1:12 in the cottages. Yet, probably did not occur at this rate since the census at Kurn Hattin has been lower the last few years.

In reviewing SWIS incident reports, children in crisis were left alone so a single house parent could manage other students in the cottage as back up staffing from the residential office returned. This was also shown in another incident where a student was showing so much aggression the house parent could not leave them alone, but the other 8 residents were alone in the living quarters. For another incident, and possibly most egregiously, one student was asked to watch another student in crisis while the house parent went to get the Director on Duty. This same incident report noted that the entire cottage is "effected by the trauma" of the crisis. This contributes to RTP Regulation 603 being rated in noncompliance because many of the incidents reviewed in SWIS have children sharing beds with other children, switching bedrooms, etc. There is not adequate overnight supervision to meet the needs of the children either. Kurn Hattin's self-study had two important quotes regarding supervision. "The residential staffing structure and the under resourced situation that has resulted from it over time does not adequately meet the needs of the children" and "The resources in terms of staff available on campus to respond to the needs of the students during the after school, evening, and weekend hours are not adequate."

Inadequate supervision is also an issue of concern shared by staff given recent reported events of Parent Cottage students being split among other cottages because coverage could not be found. They struggled with wanting to provide accurate information with keeping their job and ensuring that Kurn Hattin programming can continue. With that said, all house parents agreed that a staff to child ratio of 1:11 is too vast. Some waived and wanted to say it is manageable but eventually landed on that it was too much. It was interesting to hear house parents independently reach a ratio of 1:7 as the "sweet spot" where you can "reach each individual kid's needs a lot better." Veteran house parents noted that the "kids are different now; they're more difficult" and explained there is "much less family involvement" than there has been in the past. Additionally, there are currently 9 day students that program in the cottages until dinner time approximately. This adds to the supervision issue needing to be reconciled.

There are two new residential office staff members who are assisting with residential coverage and planning. They will

be able to provide back up to the house parents and work on scheduling, pick up and drop off of students, etc. The Residential Department is still implementing the After School Activity Block which began last year. This was an identified vulnerable time when additional staffing was needed. The counseling department has a positive relationship with the school staff. There are ongoing efforts to incorporate more of the school PBIS model and counseling screening tools into residential time. The counseling department has changed their schedules so a counselor is available until 7pm and on-call coverage is rotated. These changes were just made as the licensing visit commenced so the effectiveness of this switch is not known at this time.

As confirmed by the Agency of Education, Kurn Hattin is an approved independent school and the approval is in "good standing." There are exciting developments in the educational program and school at Kurn Hattin. They are implementing a new restorative justice model and continue to implement their PBIS model which can be applied to behavioral management in the cottages. Kurn Hattin is also part of a project to upgrade and remodel their library.

RTP Regulation 644 and 667 are rated as in compliance with reservations because of the current reporting system. Incident reporting needs to be streamlined so incidents occurring during school and residential hours are reported consistently and kept in the same location and make it to the child's file. RLSI was able to review the SWIS data which will need additional items and information gathered in order to keep aligned with RTP Regulations. The names of staff present, not just that of the reporting staff member, needs to be listed. It would be helpful to include the follow-up actions taken by staff and what the resolution to the incident was.

## 700 PHYSICAL ENVIRONMENT AND SAFETY

### GENERAL

<b>701</b> A Residential Treatment Program, including all structures and property shall be constructed, furnished, equipped, used and maintained so that the privacy, safety, health and physical comfort of all children/youth are ensured and in compliance with federal, state, local and municipal regulations.	C	
<b>702</b> A Residential Treatment Program shall pass and maintain documentation of an annual inspection of all buildings utilized by the program by an independent, qualified fire safety inspector.	C	State of Vermont, Department of Public Safety, Division of Fire Safety, Annual Inspection expires July 2020.
<b>703</b> A Residential Treatment Program shall have a designated space to allow private discussions and counseling sessions between individual children/youth and their family members, visitors and staff.	C	
<b>704</b> First Aid supplies shall be accessible in each living unit of a Residential Treatment Program.	C	
<b>705</b> A Residential Treatment Program shall keep medication, cleaning supplies and other potentially harmful materials securely locked. Keys to such storage spaces shall be available only to authorized employees.	C	
<b>706</b> A Residential Treatment Program shall ensure that there are sufficient and appropriate storage facilities.	C	
<b>707</b> Each separate living unit within a Residential Treatment Program shall have 24-hour telephone service.	C	
<b>708</b> A Residential Treatment Program shall not permit any firearm or chemical weapon on the property, including program and employee vehicles.	C	
<b>709</b> A Residential Treatment Program shall ensure that children/youth are not exposed to second hand smoke in the facility, on the property or in program vehicles used to transport children/youth.	C	
<b>710</b> Facility and staff vehicles shall be locked while on the property.	C	
<b>711</b> A responsible adult will provide continuous and uninterrupted supervision when children/youth are swimming or otherwise engaged in water sports/activities.	C	
<b>712</b> On-ground pools shall be enclosed and regularly tested to ensure that the pool is free of contamination.	C	
<b>713</b> A Residential Treatment Program shall have written procedures for employees and children/youth to follow in case of emergency or disaster.	C	
<b>714</b> A Residential Treatment Program shall conduct actual or simulated evacuation drills at least monthly and varied by shift. A record of such emergency drills shall be maintained including the date and time of the drill and whether evacuation was actual or simulated. All personnel in the building shall participate in emergency drills. The Residential Treatment Program shall make and document special provisions for the evacuation of any developmentally or physically disabled children/youth from the program.	C	
<b>715</b> A Residential Treatment Program shall ensure that children/youth are properly secured and adequately supervised in any vehicle used by the program to transport children/youth.	C	
<b>716</b> A Residential Treatment Program shall maintain, update and share with parent(s), custodians and the Licensing Authority the contact information of a specific individual to contact in the event of the emergency evacuation of children/youth.	C	

### SLEEPING AREAS

<b>717</b> A Residential Treatment Program shall ensure that all sleeping areas used by children/youth are of sufficient size to allow for a bed and to afford space for dressing and quiet activities.	C	
<b>718</b> No child/youth's bedroom shall be stripped of its contents and used for seclusion.	C	
<b>719</b> A Residential Treatment Program shall ensure that no room without a window shall be used as a bedroom.	C	
<b>720</b> A Residential Treatment Program shall not permit more than four children/youth to occupy a designated sleeping area or bedroom space.	C	
<b>721</b> A Residential Treatment Program will assign roommates taking into account gender, age, developmental and treatment needs.	C*	See comments below
<b>722</b> Each child/youth residing in a Residential Treatment Program shall have his/her own bed.	C	
<b>723</b> A Residential Treatment Program shall ensure that there is sufficient space between a mattress and another mattress (bunk bed) or ceiling for each occupant to sit up comfortably in bed.	C	
<b>724</b> A Residential Treatment Program shall provide each child/youth with his/her own dresser or other adequate storage space in his/her bedroom unless there is a documented safety concern.	C	
<b>725</b> The use of open flames shall not be allowed in sleeping areas of a Residential Treatment Program.	C	
<b>TOILET, SHOWER AND BATHING FACILITIES</b>		
<b>726</b> A Residential Treatment Program shall have available to children/youth a minimum of one wash basin with hot and cold water, one flush toilet and one bath or shower with hot and cold water for every six children/youth.	C	
<b>727</b> A Residential Treatment Program shall provide toilets and baths or showers which allow for individual privacy unless a child/youth requires assistance.	C	
<b>728</b> A Residential Treatment Program shall have bathrooms with doors which can be opened from both sides.	C	
<b>729</b> A Residential Treatment Program serving a co-ed population shall ensure private toileting, shower and bathing facilities.	C	
<b>KITCHEN/DINING AREA</b>		
<b>730</b> A Residential Treatment Program shall have a sufficiently well-equipped kitchen to prepare meals for the children, youth and employees.	C	
<b>731</b> A Residential Treatment Program shall be arranged and equipped so children, youth and employees can have their meals together.	C	
<b>LIVING ROOM</b>		
<b>732</b> A Residential Treatment Program shall have a living room/common area where children/youth may gather for reading, study, relaxation, conversation and entertainment.	C	
<b>SECLUSION ROOMS</b>		
<b>733</b> A Residential Treatment Program shall ensure all rooms used for seclusion meet all applicable state and local fire and safety codes.	N/A	
<b>734</b> A Residential Treatment Program shall ensure all rooms used for seclusion are safe, clean, and well-maintained.	N/A	
<b>735</b> A Residential Treatment Program shall ensure all rooms used for seclusion have adequate light, ventilation and maintain an appropriate room temperature.	N/A	
<b>736</b> A Residential Treatment Program shall ensure all rooms used for seclusion are designed for continuous supervision.	N/A	
<b>EMPLOYEE SPACE</b>		
<b>737</b> A Residential Treatment Program utilizing live-in employees shall provide adequate and separate living space for these employees.	C	
<b>738</b> A Residential Treatment Program shall provide office space which is distinct from children/youth's living areas.	C	

**COMMENTS:**

Kurn Hattin is a 280-acre campus with a residential school, cottages, and residences for employees who live on campus of apple orchards, hay fields and horse barns. They have gardens and grow a lot of their own food which is boasted by the administration who say Kurn Hattin started a farm-to-table food program before it was popular. The campus sits alongside a hill with the school situated up top with a view of New Hampshire and the Connecticut River Valley. Most of the cottages for girls are on the lower side of the campus, for which you have to cross a quiet, but paved road to access.

There are two cameras per cottage which are positioned in doorways and hallways. There are no cameras positioned to view bedrooms or bathrooms. Alarms are positioned on the bedroom doors in the cottages too. Cottages have single, double, triple and quad bedrooms. Rooms that accommodate four children are large and spacious. Each cottage has monthly fire drills performed at different times.

**COMMENTS:**



RTP Regulations 401, 423, 502, 504, 644, and 721 were rated as in compliance with reservations.

RTP Regulations 116, 118, 120, 122, 201, 404, 412, 419, 422, 508, 520, 522, 601, 603 were rated in noncompliance.

In conversations with your executive leadership, we understand you have an interest in closing your Residential Treatment Program (RTP) license with the Department for Children and Families (DCF) and instead operate a residential education program for children.

Based on the most recent licensing review of Kurn Hattin, we concur that your program does not meet the Licensing Regulations for Residential Treatment Programs. As such, DCF is willing to close your RTP license as of July 15, 2020 with affirmation in writing of completion of the following steps prior to closure:

- Kurn Hattin will remove any citation or reference of being licensed by the State of Vermont from the current website and in any future agency literature. This will include the removal of any programmatic advertising language that is treatment-related or would cause another state or community entity to believe you are a licensed residential treatment program.
- Kurn Hattin will notify primary referral sources in Vermont and out-of-state entities that Kurn Hattin is no longer a licensed RTP and RLSI will be cc'd on those notifications.
- Kurn Hattin will remind its staff members of their legal obligation to report incidents of suspected child abuse and neglect as mandated reporters in Vermont.
- Kurn Hattin will only accept children and youth whose social, emotional, behavioral, and educational needs can be met within your residential education program.

The alternatives to license closure by meeting the requirements above would be for RLSI to pursue the license revocation process or for your facility to remain licensed as an RTP and engage in a remediation plan that addresses RTP Regulations not in compliance and in compliance with reservation within six months of issuance of this letter. Should you choose to remain licensed, RLSI would be available to assist you in meeting regulatory compliance and would conduct a site visit to verify compliance at the end of the six months.




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Lauren Higbee, MSW  
Residential Licensing & Special Investigations

Approved by:




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Jennifer Benedict, MA, Director  
Residential Licensing & Special Investigations

## EXHIBIT 4

# **‘Culture of abuse’ alleged at Kurn Hattin over 80 years**

By Anne Galloway

September 20, 2020 – VT Digger

Growing up on the family farm in North Walpole, New Hampshire, Carolyn Blake Bradshaw lived on candy, scavenged apples and sandwiches from teachers. She remembers the constant, gnawing hunger.

Her mother put her into foster care, and by the time she reached the age of 10, she had lived in five different homes. At one point, Bradshaw was sent to the Weeks School, a reform school for children in Vergennes, even though she doesn’t recall having done anything wrong, except to have been born into a family with no means.

It wasn’t until she was sent to the New England Kurn Hattin Homes for Children that she ate three square meals a day.

But it was also there at the residential girls school in Saxtons River that for the first time, Bradshaw says, she was routinely abused.

The physical abuse began the day in November 1951 that her mother left her in the lobby. Ethel Ford, an employee, appeared and said, “Oh, it’s you. I want you to clean the stairs with a broom and a dustpan,” and she walked away.

The 12-year-old stood there, dumbfounded, then had the presence of mind to ask another girl in the room where she might find the broom and dustpan. Overhearing the question, Ford roared, “I told you to do that,” and slapped her hard on the face. Bradshaw started screaming. A few minutes later, another woman, the cook, came out of the kitchen and put tape over her mouth.

“I could hardly breathe,” Bradshaw recalled. “I was in a panic.” Eventually, the cook ripped off the tape. “That was my introduction to Kurn Hattin. It was very, very scary.”

From that moment forward, Bradshaw said she experienced some form of physical or psychological abuse nearly every day of the three years she lived at the school. For minor infractions like chewing gum or talking, girls at Kurn Hattin in the 1950s were ordered at bedtime to stand in line against a wall for eight hours at a time, Bradshaw recalls. When girls wet the bed, the houseparents made them stand all night wearing a diaper.

She thought about running away, but said she dispensed with the idea after another girl who left was dragged back to the school and went berserk, punching the walls and screaming. That girl was sent to the Brattleboro Retreat, a nearby mental health facility, she recalls.

Into the 1970s, children at Kurn Hattin, which included a boys’ campus in Westminster and a girls’ facility in Saxtons River, performed manual labor — raising and preparing their own food, cleaning, taking care of animals, haying, and hauling milk for the dairy and sap for sugaring.

Bradshaw remembers getting up at 5 a.m. to make breakfast for the 40 girls in her cottage every day for three months. If she talked back to the staff, she was made to wash all of the dishes, too. One of her chores was scrubbing the dorm stairs with a toothbrush and the kitchen walls with oakite, an acidic cleanser that burned and blistered her hands. Another time, she and other children stripped varnish from the floor of the gymnasium.

“They just worked you to the bone,” Bradshaw said. “I was like a slave there.”

Bradshaw and three of her siblings ended up at Kurn Hattin. One brother was injured in a sledding accident at the home for boys and never regained his mental capacity.

The eldest brother, Christian, was tormented by Deputy Director John Watson, who molested him five to six times in the 1940s, she said. The administrator would take two boys at a time on excursions to a campground or a motel where he would sexually assault them by turn, she said. Watson switched off with a different pair of boys for each trip, according to Bradshaw.

“He was married to the director’s daughter,” Bradshaw said. “No one would question what he did. He did what he wanted.”

In a taped interview about his experiences, Christian explained how he was abused by the deputy director, who is now deceased. “He said he was one of [the deputy director’s] favorites,” Bradshaw said. “Some boys [he] didn’t touch.”

In the 1990s, Christian confronted Kurn Hattin with the allegations and threatened a lawsuit. He gave an official at the school an original draft of his writings. She shredded the book, which he’d titled “No Ma, No Pa,” according to Bradshaw.

Pete Mayo, the longtime director of Kurn Hattin, made another brother, Harold, at age 10, spend the night in a dirt cellar under one of the buildings with the rats, Bradshaw recalls. Later, Harold cracked his head open when his sled hit a wall at Kurn Hattin. He did not receive medical treatment and never advanced past the mental age of a 12-year-old, she said.

“He was 16 when they finally let him out of there,” she said. “They kept him back because of that head injury. No one had to pay for that injury in any way, shape or form.”

Another boy, Max Lincoln, lost both legs when his pants were caught in a corn shucker in the early 1950s, according to a history of the school written by a former alumni, John Hurd. Kurn Hattin paid for his education and gave him a cash settlement of \$35,000.

Now 80, Bradshaw, along with more than a dozen plaintiffs represented by the firm Andrus Wagstaff, is preparing a civil lawsuit against Kurn Hattin for perpetuating a culture of child abuse over a period of nearly eight decades.

Victims allege residential school administrators knew about the abuse and did nothing to stop it. Child survivors say they were threatened by adults and peers who demanded that they keep the sexual assaults and other abuses secret.

“I look at it from the viewpoint, I hope and pray to God no other kids today are molested and abused,” Bradshaw said. “I’m sure there’s a lot of them who were. If they have, and, if they do, it’s time to bring it out into the open and expose it. I want the truth to come out.”

As Bradshaw suspected, the abuse did continue, for years. In every decade since the 1940s, when her brother Christian was molested by Deputy Director Watson, victims say they were molested by other students, bus drivers, teachers, houseparents and administrators.

Eerily similar patterns of sexual, physical and psychological abuse were covered up for decades, child survivors say. Documents, social media posts and interviews with victims describe how more than 60 children who were sent to Kurn Hattin to escape troubled homes were allegedly assaulted from the 1940s through 2019.

While Kurn Hattin faced a publicized criminal case in 1989, victims from the late 1960s recently came forward as part of a pending lawsuit. Other revelations of abuse from a period of 80 years have emerged only in the past several months.

In a statement on the front page of the school’s website, Kurn Hattin director Steve Harrison said the administration was “not aware of these additional, new allegations.”

“Given that most of the new alleged incidents occurred as much as 50 to 60 years ago, it is difficult to ascertain what happened, especially since most of the Homes’ leaders from that time are no longer alive,” Harrison said.

In several interviews, Harrison has declined to comment on these and more recent allegations, which occurred between 2015 and 2019. He referred inquiries to his attorney, [Gary Karnedy](#) at the Burlington firm Primmer Piper Eggleston and Cramer. In an interview on Sept. 4, Harrison said the attorney “has been clear about making sure we are sensitive to the situation and not putting the school or the homes in any kind of difficult position. We’re not trying to hide anything by any stretch.”

Child survivors say Kurn Hattin continues to deny any culpability. Three victims say they, or their siblings, confronted administrators in the 1990s about having been molested by adults and peers at the school. The administration refused to take the allegations seriously and rebuffed the former students, they say.

One alum, with the pseudonym Carter, says a boy who was the victim of a Kurn Hattin administrator in the 1950s went on to become a houseparent. That man, in turn, molested at least three boys in the late 1960s and early 1970s, Carter said, including another victim, John Doe, who also asked not to be identified.

John Doe said he was raped by the houseparent at least 50 times — in a school bus, cars and in the cottages where the boys lived — over four to five years. The molestation started when the boy was 7 years old and continued until he was 12, he said in an interview. Because of the trauma, John Doe suffers from severe memory loss, but he remembers being abused in locations all over the campus, and specifically that the man would give him Hostess pies “then start messing around with me.” The Kurn Hattin employee tried anal sex with him a number of times and made him perform a blow job as he was driving while they were traveling to Massachusetts to see the man’s girlfriend, John Doe said.

In eighth grade, he said he was pulled into the deputy director's office and asked to talk about the abuse. John Doe distinctly recalls his abuser fleeing the office.

In 1989, Mark W. Davis, a former employee who lived with a houseparent, was charged with molesting 17 boys and went to jail a year later. Davis appears to be the only perpetrator who has been charged.

According to Vermont Department of Public Safety spokesperson Adam Silverman, the Vermont State Police has received a number of complaints about Kurn Hattin over the years. "VSP has investigated those complaints as appropriate," he wrote in an email. "In all of these instances, due to the ages of those involved, we are unable to provide any further information about the investigations or their outcomes." (Troopers at the Westminster barracks, about a mile from Kurn Hattin, refused to speak with a reporter.)

Interviews with parents and new documents from the Department for Children and Families show that another 20 children were involved in peer-on-peer sexual assaults and exploitation between 2015 and 2019 in "hazing" behaviors that appear to have been passed along from previous residents, victims say.

Kurn Hattin has refused over the years to investigate claims, victims say, and the administration attempted to rebut the recent allegations in communications with the state. Harrison, who has served as executive director of Kurn Hattin since 2015 and holds a Masters of Divinity from Princeton Theological Seminary, described the Davis case as a "legacy" situation "that had been dealt with." As for allegations from 2019, he said, "We followed all of the policies of DCF. That would be the extent of my comment."

The school now faces two civil lawsuits. In 2019, Vermont became the only state to remove the statute of limitations on civil suits for child sexual assaults, [allowing victims to sue for abuse that happened long ago](#). The law gives victims, who are

often silenced by perpetrators and are too traumatized to seek justice as children and young adults, an opportunity to find resolution in the courts as adults.

Nathan Foote, lead attorney for Andreozzi and Foote law firm, is representing seven men who were abused by Davis. Foote [told the Brattleboro Reformer](#) that his clients are seeking financial damages and want an apology from Kurn Hattin.

Andrus Wagstaff attorney Kim Dougherty became involved in a separate pending civil action after Carter reached out to her in March. The firm announced in a press release issued July 2 that victims were coming forward “after decades of silence” to seek justice. Dougherty says the firm has documented dozens of survivor stories and is now representing more than 15 plaintiffs.

“While evidence suggests school leadership knew about the abuse over the years, little action was taken to stop it or remove the accused abusers,” Dougherty said. “A culture of abuse permeated the school and caused a decades-long cycle of child abuse that many of the school’s alumni are still dealing with today.”

Led by Dougherty, Andrus Wagstaff, a national firm based in Lakewood, Colorado, represented young gymnasts who were sexually abused by Dr. Larry Nassar in a lawsuit against Michigan State University. The firm also sued the U.S. Olympic Committee and USA Gymnastics. They also represent dozens of Boy Scouts and plaintiffs with claims against the Catholic Church.

Despite the recent statements made by Kurn Hattin, Dougherty said the “egregious” misconduct occurred at a “grand scale” and involved teachers and administrators. Hundreds of children, from the ages of 5 to 15, who were sent there to escape extreme poverty and abuse at the homes, cycled through the school over 80 years. “Pedophiles find the most vulnerable people to prey on and that’s what we have here,” she said.

She anticipates that more plaintiffs from all over the country are likely to come forward. Her clients range in age from 12 to 80 years old. “In order to become the safe



place it holds itself out to be, Kurn Hattin needs to stop their defensive denial and recognize these survivors and their suffering,” Dougherty said. “Without that acknowledgement, there will be little change.”

When news of the pending lawsuits broke, Harrison, the executive director of Kurn Hattin, pointed to the 1989 Davis case and would not comment on the more recent allegations, which are now part of an independent investigation. “We were aware of a group from the 1980s because the abuser was identified, convicted, and incarcerated in 1991,” Harrison wrote. “We fully investigated the incidents at the time, felt confident we knew the full scope, and are working to put that sickening chapter behind us.”

The school has hired an independent investigator recommended by the Council of Residential Excellence, Harrison said, who has “dealt with a fair number of cases of this sort and retired as an administrator from a similar kind of institution in Texas.” Comments on the Kurn Hattin Facebook page about abuse are part of the investigation, he said. “People are entitled to their own experience and relating those. I can’t speak to the context.”

In an interview, Harrison said he is looking for a public relations and reputation management firm to handle blowback from the allegations. He declined to comment on how the news has impacted enrollments and the school’s finances.

“We are a home for children with a 125-year history of quality care for children, and we continue to provide that same quality care today as when the school was founded,” Harrison said.

Last week, under pressure from the Department for Children and Families, Kurn Hattin [relinquished its license to operate a residential treatment program](#). The state worked with the institution for nearly a year but couldn’t get the school administration to comply with mandatory reporting requirements.

DCF Commissioner Sean Brown said that unwillingness to communicate with the state about abuses was a deal-breaker. “Obviously we’re concerned about the well-being of vulnerable children,” Brown said in an interview. “If we’re not aware of situations, we can’t ensure that children are protected. That’s an incredible concern for us.”

In the past, incidents involved staff, Brown said. More recently, the abuse has been “youth on youth.” “It’s a different dynamic, and it was pretty pervasive, too,” Brown said. “More pervasive than what DCF typically sees. This is an extraordinary case in that way, I think.”

VTDigger obtained documents from a 2019 investigation that show at least nine children and possibly as many as 15, according to a parent, molested each other. In addition, there have been significant threats of self-harm, violence or exploitation at the Westminster campus from 2015 to 2019. Harrison’s own 15-year-old foster child solicited “inappropriate” images of a 12-year-old girl and a 13-year-old Kurn Hattin student, according to records provided by DCF.

Nine boys, ages 7 to 11, were involved in a “touching club” for at least a year, investigators found. The boys groped each other and engaged in oral contact, documents show. The “club” was started by a boy in 2015 to 2016 who had since graduated, a mother of one of the boys told VTDigger.

Her son, who is developmentally delayed and had few friends, participated in the sexual activity after he was initiated by one of the perpetrators, she said, and believed he had to continue to keep his friends. The group gathered unsupervised at the Big Rock and also performed sex acts inside the Morrison Cottage. Her son was the only member of the group who was expelled from Kurn Hattin for participation in the club and was unfairly targeted, she said.

“My child was victimized by another child, and he had to go through specialized testing to make sure he’s not a threat to anybody,” the mother said. “He had to go to

two different child psychologists.” It was difficult to find another school that would accept him, and he has become socially isolated and struggles with peer relationships, she said.

In yet another series of incidents in 2019, three girls said a roommate engaged in “forced masturbation,” regularly sexually assaulting them with a toothbrush in the open shower room at Kurn Hattin, according to state officials. The school administration knew about the assaults in February 2019, but did not report them to DCF until April, records show.

Another girl said she felt pressured to perform sexual acts, such as oral stimulation and inserting her fingers into the vaginas of other girls, the records show. The behavior began as “hazing,” she told an investigator who identified four girls involved in the sex acts. That same year, a 12-year-old girl told a DCF investigator that she was raped by another student in an auditorium stairway.

Similarly, a boy reported to DCF that he was forced to perform oral sex on an older boy in 2017.

Also in 2017, a student “on different occasions offered \$10 to see another resident’s ‘dick’,” documents show. “He offered another resident \$75 to fondle or play with his ‘dick,’” according to the records. The allegations were reported on Oct. 20 that year, but it wasn’t until weeks later that Kurn Hattin officials reported the matter to DCF. “The incident simply wasn’t on the KH administration’s ‘radar,’” investigators wrote.

There have also been a number of self-harm incidents reported to authorities. In July 2019, a boy tied a sweatshirt string around his neck and threatened to kill himself and burn down one of the cottages at the school, records show. Another child that month tried to choke himself with a utility cord, according to documents. In September that year, a 7-year-old told other residents they were going to kill themselves with a gun the child had access to, state records show.

Kurn Hattin waited for months to notify the state of three of the incidents, violating state regulations. Under state law, all mandatory reporters (any one who is a child caregiver) must report abuse to DCF within 24 hours.

Brown says the results of the Residential Licensing and Special Investigations (RLSI) unit of DCF are “shocking.”

“We are in the child protection business and to think about kids being harmed there in these ways is incredibly challenging to think about. We were hoping that, as an established member of the community, they would take action to stop these behaviors.”

From 1989 to 2019, DCF placed a total of 64 children, largely from Rutland, Springfield and Brattleboro, in state custody at Kurn Hattin, an average of about three children a year out of a total census of about 100 residents.

DCF has provided the Vermont Agency of Education with the investigatory records and the agency is expected to review Kurn Hattin’s approval status as an independent residential school with the State Board of Education next month, according to Ted Fisher, director of communications for AOE.

In email exchanges with DCF in 2018 and as recently as last month, Kurn Hattin director Harrison disagreed with the findings of the investigators and claimed no violations had occurred. “I simply do not agree that this situation represented a licensure regulation on any count,” he wrote in response to a December 2019 investigatory report from DCF detailing the “touch club” and other incidents. The state followed up with a determination that Kurn Hattin needed to take corrective action.

Harrison wrote a “rebuttal” to the state’s determination in August, claiming Kurn Hattin had made significant improvements in the intervening six months. “The report

was an inaccurate and inadequate depiction of the Homes as we currently operate,” he said.

“We have never been perfect and without blemish in this work with children, but we have done, and continue to do, a terrific job with the vast majority of our children in a home environment that they desperately need,” Harrison told the RLSI unit. “Today, our expectation is that we will assess, evaluate, improve, and then reassess our practices and policies in order to make the experience positive for 100% of our children, contrary it seems, to the opinion of RLSI.”

In an interview with VTDigger, Harrison said DCF had recommended that Kurn Hattin relinquish the residential treatment program license because the school “really didn’t fit the parameters of what a residential treatment program was, and we might want to consider not continuing our licensure.” He insisted that the school had “followed all of the policies of DCF. That would be the extent of my comment.”

Hours before publication of this second story, Harrison upbraided VTDigger, saying it was “patently false” to report in the first article that the school was pressured to relinquish its residential treatment program license with DCF.

Harrison wrote that on their own initiative they “elected” to close the residential treatment program and will continue to operate a residential educational program. “The closure of the license is entirely unrelated to any issues of alleged abuse, and DCF never stipulated any such finding,” he said.

Brown said residential treatment programs “are not plentiful, and when you have a provider who’s been established and make commitments to make change, you want to support them and work with them to do that.”

“They were not able to implement changes and provide the level of supervision to ensure that kids weren’t harming each other, and that brought us to the ultimate conclusion,” Brown said in an interview. “We had concerns about their program,

given they couldn't make the changes. We need to move forward here. While they didn't agree with that, we're quite confident we've made the right decision."

David Hirshberg, the former director of Germaine Lawrence, a residential treatment center for girls in Arlington, Massachusetts, said the school had an ethical and moral duty to notify authorities immediately. "A minimally competent treatment center," he said, would have immediately stopped sexual activity between children.

"There is bad behavior at these places," Hirshberg said. "Kids sexually abuse other kids. You have to be supervising these kids. This is not a big surprise. When you think something happened, you have to investigate and get the authorities to investigate. Your own staff won't want to acknowledge these things happened.

"This place should be closed down," he continued. "What happened there shouldn't have happened."

Charles Dickinson, the founder of the school, was a Boston-based minister and reformer who wanted to create a safe haven for homeless boys in his hometown of Westminster. The name Kurn Hattin is Hebrew and refers to the twin mountains in Israel where Jesus delivered the Sermon on the Mount.

That strain of idealism is summed up by the school's mission, which is "to transform the lives of children and families forever." Kurn Hattin strives to "be a place of healing, hope and home" for children "with complicated family and socioeconomic backgrounds."

In the early days of the school, many of the children were orphans or had a single parent who was abusive or struggled to put food on the table because of an illness or addiction problem. Most of the residents were from New England.

The director, Pete Mayo, was "a man of action" and ran the place for the longest period from 1927 to 1962, according to a Kurn Hattin alum who wrote a history of the

school. During his tenure, the school expanded and developed a strong music program.

John Watson, Mayo's son-in-law and deputy, took over as director when Mayo died until 1976. Both men, who have been accused of abuse by survivors, are now deceased.

As Kurn Hattin evolved over the years, the school accepted children with learning disabilities and emotional behavioral diagnoses from all over the Northeast, especially soliciting residents from racially diverse families.

Harrison told the state that Kurn Hattin accepts boys and girls from "challenging home environments of dysfunction and poverty." The school provides children with "a stable, safe, secure, structured home environment first and a quality basic education second."

The idyllic setting seems to underscore Kurn Hattin's commitment to providing children with a sense of "fulfillment, success and wholeness." The 280-acre Kurn Hattin Homes for Children campus overlooks several prominent hills in the distance and is located less than a mile from I-91 in Westminster, about 24 miles from Brattleboro. The school property is divided by a paved road, with the Dean Mathey Center, a pink granite-style block gymnasium and a swimming pool on one side, and low-slung white "cottages" on the other.

Groups of up to 24 students live with houseparents in the nine cottages tucked into the landscape near pastures and playing fields that roll away toward the highway and the Connecticut River. Nearby is a white board fence penning handsome Palomino ponies and a 19th century barn with peeling red paint and a luminescent hipped roof.

Typically, Kurn Hattin has about 95 students enrolled in the residential program. In early September, the campus appeared to be practically empty. Only one small group of boys roamed the campus with a teacher. Maintenance workers trimmed the grass

and cleaned a gleaming blue pool with no children splashing in the hot sun. A few administrators, including Harrison, were in the Mathey Building.

The features of the campus loom large in the imagination of Kurn Hattin alums, whether they found solace there or faced abuse.

Many say the school has had a positive impact on their lives. They have fond memories and credit Kurn Hattin for their success as adults. On a Facebook alumni page, they mourn the passing of favorite houseparents and share memories of adventures on the farm. The school is credited with giving them moral fiber, a work ethic and lifetime connections with schoolmates.

The fundraising arm of Kurn Hattin has leveraged this loyalty to good effect — raising millions of dollars in charitable donations for its \$5 million annual operating budget and a healthy reserve. In 2016, the nonprofit had assets of \$47.8 million, according to financial statements provided by the Agency of Education. Plaintiffs say the school has received contributions in the hundreds of thousands of dollars from former alumni, including victims who generously support the school.

Carter who attended Kurn Hattin in the late 1960s and says he suffered years of physical, sexual and psychological abuse, also has a deep connection to his former classmates and has donated money to the school. But he is disappointed by the recent statement from Kurn Hattin, which does not acknowledge a culture of abuse that has gone on for decades, causing irrevocable damage to the victims.

He says he joined the lawsuit to break the grip of fear Kurn Hattin has had on his life. Carter has suffered from deep depressions caused by the pain and humiliation of childhood memories that constantly haunt him.

“I want the world to know the truth and the details of what happened,” Carter said. “It’s not my fault. It’s not the other survivors’ fault, it’s Kurn Hattin’s fault. They nurtured the abuse, whether they realized it or not.”



A victim from the mid-1980s whose pseudonym is Sally Smith was sexually abused by her biological father, starting at the age of 2. When he went to prison, she was sent to Kurn Hattin, where she was serially raped by a man in his mid-20s who drove the bus and worked at the school.

“I was put there to be removed from a sexual abuse situation and then it never stopped,” she said. “Sex was just life, that’s what I was taught.”

It wasn’t like she could leave.

“Home was not a good place,” Smith said. “There was no safe place. There was no place where I could be OK. Nobody ever protected me.”

Between the ages of 12 and 14, she recalls forced sex with the Kurn Hattin worker so many times the experiences run together. She was assaulted in the pool chemical room, on the bus, in the boiler room — wherever he could corner her, she said. “When we went to the Red Sox game, he made you give him a blow job on the bus,” she recalls. In her mind, the assaults are all “one big old blob.”

“It never stopped for me that’s all that was ever talked to me,” Smith said. “I thought sex was normal — I was f—ed at 2 years old. People picked up where he [her father] left off.”

What infuriates her is that she recalls the director, David Maysilles, and others asked her about the abuse and then “just ignored it.” Maysilles, recently deceased, came from a generation that didn’t talk about sex, she said.

“They all got away with it for so many years. They all knew,” Smith said. “There isn’t a piece of me that doesn’t believe that.”

In the middle of her eighth-grade year, she said, administrators took her to a gynecologist in Bellows Falls, where she was fitted with a diaphragm. When she

graduated, she said they gave her a present: A three-month supply of birth control pills. Smith was 14. A year later, she had her first child.

“Why would they give you a diaphragm halfway through the school year? They knew,” Smith said.

Smith says several years after she graduated, the Vermont State Police showed up out of the blue at her doorstep in New Hampshire and interviewed her about the perpetrator .

“I denied it,” Smith remembers. “Still in my head, I didn’t think it was wrong. In my mind, it was still OK. I didn’t understand being violated. I was scared to death with a young baby in my arms at my mother’s house.”

The former bus driver was not apprehended, and abuses at the school continued.

Time has passed, and Smith now feels able to come forward. She says she doesn’t want anyone else to get hurt. “We can’t prevent what happened to the rest of us, but we can make sure going forward nothing happens to them,” she said.

“It’s gotta stop,” she said. Smith compared the abuse at Kurn Hattin to the cycle of normalized abuse families carry forward for generations. “It took me to my mid-30s to learn that making love was just that. That I wasn’t just a f— machine.”

The sexual assaults were more than 30 years ago, but memories of the abuse came flooding back when she read about the Andrus Wagstaff lawsuit. Smith, who has been a nurse for the past 29 years and has children of her own now, says her life hasn’t been the same since the reports came out. She’s had to go back into therapy. In the interview with VT Digger, she was distraught and went directly to an appointment with her counselor afterward.

“I’m struggling hard,” Smith said. “It’s like it’s yesterday. Since July, I have constant nightmares. Things are coming into my head, little things that trigger the next thought.

“Your childhood is what you spend the rest of your life getting over,” she said. “I don’t remember toys. I don’t remember playing. I can’t conjure that at all. I remember sitting in a ball and crying. My depression is lifelong.”

Jenny Coleman, the executive director of Stop It Now!, a Massachusetts-based child sex abuse prevention group, says it is very common for survivors to delay disclosing abuse until years, even decades later.

Abused children are in survival mode, not knowing when it is safe to identify what happened, Coleman said. The abuse affects a child’s basic functioning. Adults aren’t trusted.

“For many folks, they don’t realize that what they’ve gone through isn’t what everyone goes through and there aren’t role models to contradict that,” Coleman said.

One of responses is, they don’t trust adults, said Hirshberg of the Massachusetts treatment center. “It’s not a stretch of the imagination to understand that,” he said.

Men, in particular, often delay disclosure for 20 years or more, [according to Psychology Today](#). Sexual activity between boys can undermine male identity and trigger fears that they’re gay, she said.

Victims often suffer from post-traumatic stress disorder or depression. And research shows that, when they do come forward, they are often subjected to victim-blaming.

One of the things that really struck Coleman about the Kurn Hattin abuse cases is that in many cases children did tell adults what was happening and their stories weren’t believed. “It’s not just abuse itself, but a lack of response to the abuse,” that can

damage a child's belief in self, she said. "It's just such a shame. Healing can happen immediately when we respond with belief and safety."

The culture of intense silence at Kurn Hattin likely further damaged the children psychologically, she said, because they grew up "without anyone believing them." The children were already vulnerable and had special needs. The layer upon layer of trauma in this situation is "really profound," she said.

"The place had no boundaries, no sense of respect for personal boundaries, the culture was riddled with abuse," Coleman said. "I was really struck by the pervasiveness across ages, across genders, across the years."

Childhood trauma can have a profound impact on educational success, professional success and the ability to support yourself, she said. Survivors are at high risk for physiological problems, including obesity, stress, anxiety, changes in brain development, and cardiopulmonary and gynecological diseases. They are also more likely to be revictimized and become addicted to drugs and alcohol.

"These kids often have gotten into deep trouble because they act impulsively," Hirshberg said. "They have never seen consistent consequences. They don't believe what they do matters. Things happen to them. They don't believe they have choices."

Victims of sexual assault [are 10 times more likely to take their own lives](#) than people who have not been victims of sexual assault, according to the National Sexual Violence Resource Center.

Carolyn Blake Bradshaw was so traumatized by physical and psychological abuse at Kurn Hattin that when she joined the Air Force at Lackland Air Base in the mid-1950s, she was triggered by the routine discipline and begged to be discharged.

"I couldn't take it," the 80-year-old said. "I had nightmares from Kurn Hattin. The Air Force was very rigid. They had stiff regulations and it brought back all the memories

— I had to go to the top brass and talk to her about getting out and that's when I realized I had some problems.”

Bradshaw had become accustomed to the normalized abuse at Kurn Hattin. “I didn't know what they were doing to me was bad,” she said. “I suffered through it. I tucked it away and went on.”

She had anxiety attacks in the classroom and to this day suffers from agoraphobia and needs to be near an exit in a crowded room.

Bradshaw buried her experiences at Kurn Hattin and as an adult she became emotionally attached to the place. She spent time with the children, served as a vice president of the alumni board and helped Kurn Hattin raise money.

“I jumped from marriage to marriage, but I always had this thing about Kurn Hattin that I owed them my life,” she said. “I went from a home where I was starving to death. I had a bed there, I had clothes there, I had food there. I owed them my life.”

Though Bradshaw has five children of her own, she wanted a connection with the children at Kurn Hattin.

“They were my abusers but I didn't hate them for it,” Bradshaw said. “I became family with the kids, that's why I've been back. I was searching for family. I wanted family so bad.”

Hirshberg says it's common for abused children to remain loyal to their families and to institutions that replace the family unit.

“There is nothing mysterious here — humans tend to defend, protect, and feel deeply connected to, their family,” he said. “Regardless of internal strife, the family remains the most basic institution of human life, providing a sense of safety, nurturance, and identity.

“We are a herd species and the thought of being alone in the world is horrifying; more horrifying than traumatic abuse is being alone in this scary, uncontrollable world,” Hirshberg continued. “How does this relate to feelings towards an abusive treatment facility? Residential homes are substitute families. Even when abuse occurs, residents form meaningful relationships, receive nurturance and emotional support, have shelter and food. The abuse is traumatic but it is hardly the full experience. The need for family is powerful and we humans find it wherever we can.”

Carter says when his own children reached the age of 6, memories from the school came flooding back. “It was a horrifying epiphany,” he said. “I saw my own precious children in that place and understood that what once was normal in all that I ever knew was not normal.”

Over the years, Carter has reached out to former abusers and alums of Kurn Hattin to make sense of the place and what happened to him there. Former students are all “deeply connected to that place” because it is where they made their first friends and forged their first memories, he says. Children clung to friendships forged in harsh circumstances.

The cognitive dissonance of deep-seated fear about “a place they hold dear” is difficult to manage, Carter says.

A number of his friends and acquaintances have died young of alcoholism, overdoses, by suicide and health ailments.

Carter remembers very little about his life before he was sent to Kurn Hattin. From the moment he was dropped off at the Westminster school and separated from his mother, his consciousness quickened. Before that day, he had few memories.

That day was “the start of the rest of my life,” as he describes it.

That Sunday the school held an assembly in the Main Building where reel-to-reel movies were played.

As they waited for the start of the film, the principal of Kurn Hattin, Henry Rodgers, was pacing back and forth, scowling at the boys.

Carter paid attention and sat quietly because “I knew I needed to behave.” Then the principal stopped in front of him and said, “Pick up that gum.”

Confused, Carter asked, “What gum?”

Rodgers pulled the 45-pound boy up by the hair, threw him on the floor and ground his face into the linoleum. Then he calmly said, “I didn’t ask if it was your gum.” Then the imposing former Boston cop pulled Carter back up by the hair and told him to pick up the wad of gum.

The other students watched as Carter, in a panic, scratched with his fingernails at the hardened deposit fused to the floor.

Rodgers was not only the principal; he was also the sports coach and an eighth-grade teacher. His office was at the end of a hallway near the first- and second-grade classroom. He kept the door open. There was an easy chair where he’d sit smoking and glowering at the kids. Carter says he also held court there, “getting little boys to do his bidding and holding little girls on his lap.”

“I dreaded walking past,” Carter said.

As an adult, Carter is still tormented by the memory of that first encounter with Rodgers, and the principal lives so large in his mind that he was surprised to learn that Rodgers died of a heart attack just a few months after the chewing gum episode.

When the first- and second-grade class was told about the principal’s death, a feeling of intense joy spread over him, and he convulsed in a fit of hysterical laughter. To

suppress the sound, he wrapped his arms around himself — afraid he'd be caught laughing. "I was free, I was free forever."

But the feeling of rapture didn't last long. While Carter's mind was eased temporarily, life at Kurn Hattin remained a harrowing experience.

On a daily basis, Carter said he experienced and watched other boys suffer psychological torment reinforced by acts of physical and sexual abuse that were meted out at random and with a frequency that filled him with horror and dread.

Boys who stuck out in some way — who had learning disabilities or were overweight — were persecuted, Carter says. Others, he said, were "pets" groomed by adults and given special treatment. These students often became the worst bullies.

Carter said a boy he considered a friend forced him to perform oral sex. "I found out why I was the recipient of his attention in the basement of the dorm," Carter said. In his head, he can still hear the perpetrator's New England accent. "'Caaaatah, you're f—king queer,' as if I was forcing a homosexual act on him."

Afterward, he said, the older boy threatened to kill him. He gave him a choice: by rifle, or bow and arrow. "I took that very seriously."

But the emotional blow was even more devastating. "I was so disappointed," Carter said. "I felt betrayed. He had been grooming me a long time."

A friend Carter tried to protect was forced to perform oral sex on an older boy in the showers, Carter said.

Afterward, the boy experienced mental distress, and on occasion would squeal and rock back and forth uncontrollably. To this day, Carter blames himself for not being able to stop the abuse and appears to be more traumatized by his inability to prevent the cruelty to his friend than he is by his own sexual abuse.



“To be a little boy far from home and to watch the suffering of another little boy and not to be able to do anything was terrible,” Carter said. “There are ways of dealing with your own pain.”

“The harsh reality of that place was that he shouldn’t have been there,” he said. “I couldn’t protect him and I couldn’t take care of him. But we were like brothers. That’s how I felt about him, like brothers in war.”

Another boy, who was overweight, was mercilessly taunted by a bully. At one point, Carter remembers coming across a group of boys standing in a circle in the corner of the gym. They were applauding and cheering, and at the center of the circle was the overweight kid with ropes around his ankles. The bully and his friends were tugging on his arms, too, pulling as hard as they could at both ends of the boy’s body, seemingly intent on ripping him apart.

“John was pale white, trembling and sweating profusely, he could not scream, he could not speak, only pitiful squeaks issued forth from his mouth. He looked like the victim of electric shock. It was f—ing terrifying to witness.”

Carter pushed the bully and he dropped the rope and turned away.

That same day, late in the afternoon, he came across another ring of boys near the gym. This time, they had a rope around the overweight boy’s waist and they were pulling it so taut that he couldn’t breathe. He couldn’t utter a sound.

Carter ran up to the bully and pushed him, again. This time, he put the rope around Carter’s waist and pulled it tighter and tighter until he went limp with the top half of his body flopped over. His vision was cloudy and he couldn’t breathe. “I thought, they’re going to kill me,” he said. “And I started to lose consciousness. I got calm and lucid and I thought I’m going to die.”

Then suddenly, the bully stopped, leaving him for dead.

Carter's houseparents ran Dickie Cottage, where 24 boys as young as 6 were in their charge. The couple made life for the boys a misery. Carter describes them as scary narcissists who punished the boys regularly.

"They punished us continually and without reason or justification. They either got their jollies from it or they didn't know what to do with us or didn't care," Carter said. "We were controlled every waking hour."

Every morning, one of the houseparents, Dick, woke them up by catapulting the boys off the beds onto the hard oak floor. "If you overslept, you'd wake up suspended in the ether," Carter said.

Each boy was required to make his bed every morning to Dick's arbitrary interpretation of Army regulation standards so that a quarter would bounce off the surface of the sheets. If a boy failed to make his bed properly, Dick would throw the mattress on the ground and make him start over.

Many boys peed in their beds, and Dick would humiliate them further by dumping their beds on the floor. When that daily routine was over, he would needle them with noogies and sidle up and slap them on the back of the head or kick them in the butt.

The boys were miles from home and could communicate with their families only by letter. And even that private communication was subject to the houseparents' purview. Every letter was read by the houseparent. "I can't tell you how stressful that was," Carter said.

The female houseparent would watch the boys as they showered. When they changed out of their play clothes into school pants, she insisted that the boys line up in front of her office and prove that the seams of the pants were lined up on the hangers. If they were not perfectly aligned, she would fly into a rage.

At night, she would walk through the dorm with a yellow pad and folding chair, another victim recalls. She would sit by each boy's bed and ask if they had done anything wrong. Carter used to make "s—" up because he hadn't done anything wrong. The woman would know if they had or hadn't behaved badly and would call the boys out for lying.

"Everyone I knew was under some form of punishment," Carter said. "At this point in my life, I was innocent, not to mention constantly terrified. His female houseparent was the second most terrifying person to him, after Henry Rodgers."

Often after Carter gave his usual recitation, she said, "You didn't do anything wrong," and made him stand in the corner "because you didn't do anything."

"I can taste the paint on the wall," Carter said. "I can still smell it, but standing in the corner was a relief over enduring her psychotic rage."

At 4:30 p.m. every day, the boys were told to stand in line and strip down to their white cotton underwear. The female houseparent then inspected their bottoms for brown streaks. Boys who had soiled their underwear were called babies and forced to sit on toilets for 30 minutes in open stalls while the rest of the students were allowed to shower and get ready for dinner.

"Every day she would scream, 'oh baby's on the pot!'" he recalls.

She also threw a fit if the boys used the words "I think," in a sentence.

That ran counter to her husband's nightly ritual.

"We had to stand facing the wall in front of a large empty cork board that had ironically a white sign with large bold black print that said simply 'THINK.' The male houseparent would then pull up a table and chair behind us and force us to perform deep knee bends for hours while standing in a pool of our own piss, often with our pants around our ankles," another victim recalled.

Dick would yell at the boys if they tried to pick up their pants.

“We were not allowed to go to the bathroom and sometimes you pissed yourself,” Carter said. “Everyone has a piss story.” Often the PJs would fall to a boy’s ankles and there was no way to keep them up.

When they went swimming in nearby Mill Creek or the indoor swimming pool at the girls school in Saxtons River, the boys were not allowed to wear shorts. They were expected to skinny-dip while the adults watched. “Your genitals were available for any other boy to fondle, molest or whatever in that context he felt appropriate at the time,” Carter recalls. “All of that stuff was normal to me. That’s all that I knew. It was everyday behavior there. It was normal there.”

Joe Kemp, a retired Phoenix policeman who was a houseparent at Kurn Hattin from 1972 to 1981, said the school policy was for boys to swim naked. His first week on the job, he said, “It was pointed out to me there was an actual schedule of rules, and one of them was that the boys would swim in the nude. I took it off the wall and threw it away.”

“I thought that was crazy and I didn’t understand it,” Kemp said. He bought bathing suits for all of the boys and “that ended that practice the first week I was there.”

Kemp recalls rumors about problems with abuse at the school before he and his wife arrived, but while they were houseparents for nine years he doesn’t remember any allegations of molestations or “anything of that nature.” “I’m not aware of anything like that happening there,” he said in an interview. “We were happy working there. We thought it was a good place. We did make improvements and it became a better place.”

Before the Kemps arrived, Carter says voyeurism was normalized. When one of the houseparents thought Carter participated in a pillow fight along with another boy, she took them to the bathroom and told them to take their pants and underwear off, and

then handed them a dry cloth and demanded that they polish the linoleum floor on their hands and knees. They went back and forth under the sink, under the urinal, under the toilets for several hours until their knees were bloody and the floor shone.

On more than one occasion, Carter negotiated the terms of his abuse, opting for physical assault over sexual assault. A bully who had enslaved another boy to perform chores and sexual acts also tried to force himself on Carter. “I traded sexual abuse for physical abuse. I took blows to the head and chest instead.”

Carter recalls the anger and dismissiveness of the people “who were paid to take care of you.” The employees were local people who had few choices in life other than to work at Kurn Hattin, where they could get three meals a day, a free place to stay and get a paycheck. “They were not qualified in any way,” he says.

“Willful blindness doesn’t absolve you of the wrongness of what’s happening around you,” he said. “People didn’t do what they were supposed to do.”

The boys were also required to keep the Kurn Hattin farm going and keep the landscaping up on the campus.

If there was no snow on the ground, they rolled and pushed and skidded boulders to a pile at one end of the property. In some cases, the rocks weighed more than several boys put together.

“We wrenched our backs, we crushed our hands.”

Carter describes the rock pile as a Sisyphean odyssey. “It was an everyday slog of dirt, strain and sweat and mindless routine and never-ending stress, all under the guise of punishment for something you had been unjustly accused if you knew at all what you had been unjustly accused of.”

“We were needy for their approval,” he says. “We wanted to move the biggest rocks.”

“This was not a character-building routine”; it was not healthy in any way or by any definition. It was, he said, exactly as the abusive houseparents intended it: cruel abuse.

Near the end of Carter’s time at Kurn Hattin, Joe Kemp and his wife, Joene, arrived as houseparents. They put an end to the skinny-dipping, and limited the bullying and abuse. Carter was grateful they were willing to defend the boys, and even more thankful that they were willing to treat him with respect and offer positive reinforcement.

“She was talking to me like another adult,” he said. “That was the gift she gave me. She was never irritated or dismissive.”

Those were rare qualities in caregivers at Kurn Hattin, he said.

Road signs off Interstate 91’s Exit 5 point to Westminster’s Kurn Hattin Homes for Children.  
Photo by Kevin O’Connor/VTDigger

Carter asked Chris Barry, a former director of Kurn Hattin from the 1990s, to address the abuses, and he said was told “Why don’t you people just get on with your lives.” VTDigger attempted to reach Barry, but the most recent known phone number was disconnected.

Carter later contacted Harrison anonymously by email in March 2018, detailing what he knew and asking the director to look into the allegations.

“With the recent changes and social awareness, what is Kurn Hattin doing to address its own abuses in the past?” Carter wrote. “Just because the residents at Westminster were male and many are now deceased, it does not relieve the entity that is Kurn Hattin of your responsibility. Willful blindness solves nothing and serves only to reinforce your complicity.”

Harrison asked Carter to meet with him. “I rarely respond to individuals who choose not to identify themselves, but in this case, I will make an exception.” He went on to

say that he had “limited knowledge of the past,” the previous two co-directors had died, and Barry “has estranged himself from the Homes and has no contact with me on any matter.”

“I have little to no knowledge of the alleged incident(s) to which you refer and no way to found (sic) out as the institutional memory passed on with the individuals and no other records appear to be extant,” Harrison wrote.

The email exchange went on for several days and landed in a stalemate. Carter insisted that the director investigate Kurn Hattin’s dark past and provided explicit details about allegations of abuse, suggested records he could review, listed names of people with knowledge. Harrison said, “If we do not meet, the issue ends here.”

After Carter’s plea for an internal acknowledgement of the abuse failed, he became a plaintiff in the lawsuit. A settlement would force the school to document what happened, he said, and “reflect on how they got to this position today.”

“They have directly created the situation they are in now because of their lack of action and defensive posture of denial in the past,” Carter said.

## EXHIBIT 5

Kurn Hattin Homes for Children  
Governance and Oversight Enhancement Program  
Prepared by Mark Bodin, President of Board of Trustees  
April 2021

### Introduction

The best and most successful organizations are Learning Organizations. These are organizations of all types that recognize they must continue to learn and adapt to remain relevant and grow stronger. Learning Organizations are excited about the process of continuous improvement. Kurn Hattin is such an organization - and not just in the classroom. This culture exists throughout its staff, management and governance structures. While this review process has placed a keen eye on Kurn Hattin's responses to specific issues, it has seemingly cast a blind eye on the ongoing programs, initiatives and efforts Kurn Hattin has long had in place. The enhancements to and strengthening of Kurn Hattin is ongoing, it is thoughtful, it is strategic and it is who we are as a Learning Organization.

I appreciate the opportunity to shed light on Kurn Hattin's approach to this process.

### My background

I joined the Kurn Hattin Board of Trustees in 2016 and proudly assumed the role of President in September 2018. I am fortunate given my professional role, experience and extensive background in all aspects of nonprofit organizations I have the opportunity to serve on virtually any local Board. I choose Kurn Hattin as my top priority due to the immense sense of purpose and my ability to make a difference. My philanthropic and volunteer priority is children and I have not found an organization that makes a greater impact in the lives of children and families than Kurn Hattin. Plain and simple, Kurn Hattin serves children that all other institutions have failed. These aren't the hand-picked "best of the best" and it is hard work. The experience as a member of its governing body is rewarding as there is nothing more worthy of my time and efforts than the work being done for these children. Additionally, Kurn Hattin management is welcoming and receptive to the contributions and ideas of its Trustees and Incorporators. Kurn Hattin occupies a lot of my time and it is worth every minute.

A summary of my qualifications to lead the Kurn Hattin Board of Trustees includes my professional experience as President of a high performing financial institution, Savings Bank of Walpole (SBW). SBW has been named one of the 85 Best Banks to Work for in the U.S. four consecutive years and the leading national survey firm for financial institutions has named SBW the Best Overall Bank in N.H., the state's leader in its Commitment to the Community and more recently the Best Performing Bank in N.H. during the Pandemic.

Prior to joining the bank in 2010, I spent 16 years as CFO, CFO/COO and COO of the Student Conservation Association (SCA), a national conservation service organization engaging youth in conservation service activities in all 50 states. SCA members are primarily high school and college students serving from 4-52 weeks and contributing more than one million hours of service annually. During my tenure, the organization's annual budget grew from \$6-36 million and we completed two major capital campaigns. At SCA, I gained in-depth experience in every aspect of nonprofit organizations. Both positions noted above have a significant risk management element, one dealing



with \$600 million of other people's money, the other far more importantly dealing with human life. Finally, despite my origins in finance, I consider leadership and organizational development to be my greatest areas of expertise.

A more comprehensive listing of my professional and volunteer experience is attached.

#### My priorities as President of the Kurn Hattin Board of Trustees

I came into my position with the primary objective of strengthening the Board and Incorporator base and ensuring both are contributing at the level Kurn Hattin deserves. I believe Kurn Hattin has always had a strong pool of talented supporters in the governance area and the strengthening of the talent pool was underway when I took over. My objective was to continue to diversify and strengthen the talent base and develop a structure in which Kurn Hattin would benefit from these talents.

As happens in any Learning Organization, my priorities and contributions have expanded into other key areas including Organization Development/Culture and Guiding Operational Changes.

Along the way, an important change has been to the culture and orientation of the Board. Again, this started before my tenure as President and the recent issues. My take on past Boards is they had a sharp focus on the financial situation of Kurn Hattin. While it is hard to criticize a Board for that focus, I believe much of the frugality came at the expense of staff. This Board is different. We have adopted the philosophy that if you take care of staff, you will retain your best team members and in turn they will do a great job. In the past few years, many positive changes have improved staff pay and benefits as well as providing approvals to spend more freely to improve the program. Kurn Hattin is on sound financial footing and the increased willingness to "spend to improve" is well placed and responsible.

A number of highlights are included below.

#### Strengthen the Board and Incorporator Base

As noted above, Kurn Hattin requires a strong and engaged Board and Incorporator base to address the increased complexity of the organization and times we live in. Enhancing the talent base and structure is not new, but has been a priority of mine.

- Add talent to the Board and Incorporator base
  - Additions have included expertise in independent schools, higher education, youth leadership, development and legal.
  - A list of new Trustees and Incorporators added the past four years is attached.
- Remove underperforming Trustees and Incorporators
  - Underperformance was related to the level of engagement or availability to contribute at the level expected. We have high expectations for Trustees and Incorporators.
- Revise the Committee structure and expectations
  - Committees are the place where most work of the Board can be achieved. They provide time for deeper conversations and focus.
  - The revised structure provides opportunities for Incorporators to contribute their talents and expertise. This also allows a "test period" for future Trustees.

- Formed a Child Experience Committee to ensure management is meeting the Kurn Hattin mission (details included in a separate document).
- The revised structure provides opportunities for greater Board/Incorporator/staff interaction – especially in the Child Experience area.
- A copy of the Committee Guidelines is attached.

### Organizational Development/Culture

It is fair to acknowledge that the incidents noted, lawsuits, COVID shutdown, challenges in hiring/retaining house parents, decrease in student numbers, shortcomings of the former Director of Residential Life and long-term organizational structure had an impact on staff morale – how could it not?

- Work to create and support the new position of Assistant Executive Director
  - This addressed the number of direct reports for the Executive Director and allowed greater focus.
  - Helped further develop all child serving departments as a team.
- Replace the former Director of Residential Life
  - This has paid immediate dividends and a much stronger external candidate was ready to step in right away. This was difficult, but well done.
- My work with Leadership
  - I spent a lot of time working closely with the Executive Director and Assistant Executive Director on the areas of structure, culture and morale.
- Open forums
  - We held quarterly open forums for staff to join management and members of the Trustee's Executive Committee to talk about where Kurn Hattin was, where it was going and anything on their minds. I believe this was a very positive step in fostering a culture of openness and transparency.
  - We were able to address staff fears about the future of Kurn Hattin – many were long-standing based on comments from long ago (i.e.; someone reflected on concerns from a comment made seven years earlier that the endowment would only last another seven years - in reality the endowment is larger today than it was at the time of the comment).
- Visibility
  - I have made it a point to be part of large staff gatherings including trainings and social events. The feedback has been that my talks are inspiring and have helped with morale.
  - The Board of Trustees and Incorporators sent a letter to all staff recognizing them for their outstanding efforts in the face of the many challenges of the times. A copy of the letter is included separately.
- Professional Development
  - In addition to my work with management, I have offered and at times worked on the professional development of a few younger, emerging staff members.
  - I believe we are developing a pool of young talent capable of leading Kurn Hattin in the future.
- Changes to the Board's Approach/Culture
  - As noted above, the Board's approach has changed in regards to spending to improve Kurn Hattin – especially as it relates to staff.

- The focus has been taken off of numbers of students and onto the quality of the experience. That has led to the intentional decrease in the student population.

#### Guide Operational Changes

While the Board is clear in its distinction between governance and operations, I/we have been active in working with management on operational changes. Some of these overlap with the section above.

- Changes to compensation structures
  - Have resulted in greater retention and rehires of trained and experienced staff.
  - The significant restructuring of the house parent pay structure has been effective and a boost to the child experience.
- Reduced student population
  - Maintaining a reduced student population has been a culture change for the Board and staff.
  - Reducing student numbers allows management and staff to focus on fewer students while reevaluating the experience and identifying and implementing changes.
- Extended hours for counseling and nursing
  - This is another area that has strengthened the child experience.
- Strategic Planning
  - Management utilized an experienced external facilitator in a comprehensive strategic planning session including Board, Incorporators and many staff. An on-site staffing model and technology plan were identified as future priorities.
  - Unfortunately, the session took place on March 7, 2020 – just before everything shut down due to COVID, but the plan remains on the table and the Board is beginning planning for a capital campaign to achieve the strategic objectives.

I am hopeful this overview paints the picture of Kurn Hattin's governance structure as one that is, and has always been, actively engaged with management and one that reflects the values and actions of a Learning Organization.

I am proud of my involvement with Kurn Hattin and am gratified by my ability to make a difference in something so important.

Thank you

Mark Bodin  
President of the Board of Trustees

Attach.

Mark Bodin experience listing  
Board and Incorporator additions last four years  
Board committee guidelines

## **EXHIBIT 6**

### **Kurn Hattin Homes Child Experience Committee Purpose**

#### **Background:**

In early 2019, Trustees Terry Holcombe and Mark Bodin commented to the full Board that while the Bylaws required Committees to govern financial matters, governance of itself and the overall leadership of Kurn Hattin, there was no committee focusing on the child experience. The Board agreed with the importance of forming such a committee, originally called the “Student Life Committee”. Former Trustee and current Incorporator William Scarlett and Assistant Executive Director Sue Kessler were tasked with further developing the working charter of the committee. In a June 2019 oral report to Trustees they proposed the committee’s purpose as “The Student Life Committee will provide broad oversight and policy guidance where needed, to promote a safe and supportive residential and school environment that encourages student growth, academic success, and personal development”. The issue of governance vs. operations was discussed and it was made clear that operational expertise lied with management and staff and it was important the lines not be crossed.

The renamed Child Experience Committee has taken life in early 2021 under the leadership of long-time Trustee Janet Wilson. The Committee includes six Trustees, four Incorporators and nine staff members. The Committee and its subcommittees have met multiple times in 2021.

The simplified working purpose statement is “To ensure the mission of Kurn Hattin is being consistently met”.

An outline of the Committee structure is attached.

Kurn Hattin Homes  
Child Experience Committee

Committee Structure  
March 2021

Background:

The Kurn Hattin Child Experience Committee had a very active and exciting initial meeting on February 24. A follow up meeting is scheduled for March 24 to discuss how to channel the significant amount of information that was covered and decide on a structure and process for the Committee. It is also critical to note the purpose of the Committee is governance and members must resist the interest and urge to get involved in operating issues – unless specific expertise exists and such involvement is invited by staff. The “how” of Kurn Hattin is to be directed by management.

It is also important to develop measures for each of the key areas impacting the child experience to truly determine whether the mission is being met. There will always be amazing anecdotes and success stories, but we must be able to measure the key aspects of the mission. It is equally important that management and staff are open in communicating the key challenges they are facing.

Child Experience Committee Subgroups:

To ensure the different elements covered by the Committee receive the care they deserve, the Committee will be divided into four Subgroups as follows.

- Counseling and Health – Rhonda Nolan and Bill Scarlett; Staff: Melisa Stroup, Leah Gordon and Lee Bliss replacement
- Residential Life: Wylene Wood, Eric Velto and Terry Holcombe; Staff: Ellen Wood and Will Gardner
- School: Cheryl Sherwin and Steve Peterson; Staff: Sergio Simunovic and Will Gardner
- Admissions and Outreach: Janet Wilson and Mark Bodin; Staff: Crystal Card and Tienielle Stone

The subgroups will meet at least 1-2 weeks before the full Committee and will discuss key elements of the assigned areas. Once again, these should have a governance focus. Specific content and structure will evolve over time. Minutes are not required from Subgroup meetings.

Child Experience Full Committee:

The full Committee will meet at least 2-4 weeks prior to the Board of Trustees meeting with minutes taken and included in the Board package. The full Committee will review key measures and discuss highlights from the Subgroup meetings. Once again, specific content and structure will evolve over time.

## EXHIBIT 7



### **NEW ENGLAND ASSOCIATION OF SCHOOLS AND COLLEGES, INC. Commission on Independent Schools**

October 1, 2020

Mr. Stephen B. Harrison  
Executive Director  
Kurn Hattin Homes for Children  
708 Kurn Hattin Road  
Westminster, VT 05158

Dear Steve,

Thank you for forwarding to us a copy of Kurn Hattin's response to the variety of concerns around allegations of sexual abuse at the school. You report that the school's leadership had been aware of these issues for some time and, from your perspective, has been responding actively. You also note the school's assertion that the Vermont Digger article does not accurately portray a number of the issues, particularly those around the mutual decision by Kurn Hattin and the State of Vermont to terminate the "Treatment" designation of the school's state approval.

Because of the ongoing investigations, the potential for mediation and the possibility of further legal action, and, from our perspective, the absence of transparency with NEASC Staff and the Visiting Committee, at this time NEASC will be "tabling" the school's application for Accreditation. This decision indicates only that significant issues remain to be resolved by the school and by agencies and/or authorities beyond the reach of Accreditation and that we will not be in a position to act until these decisions have reached conclusion. The school will remain as a Candidate for Accreditation, but no further dues will be required until the Commission can take final action should this situation extend beyond September of 2021.

We would expect the school to provide the Commission with updates when there are definitive steps to report. We will be able to reconsider Kurn Hattin's status once the Commission can be assured that regulatory, investigations, mediation and legal concerns have been fully resolved. In part, we have decided to proceed in this situation under our NEASC "Complaint Policy" which indicates we will not take action if there is pending or active legal action. Because Kurn Hattin has no NEASC Accreditation designation, we would not have received complaints from outside sources. We have raised these ourselves out of concern for students and, also, because the school chose not to share this information with NEASC prior to these situations becoming a public issue.

I note our concern that neither NEASC Staff nor, as far as we can determine, the Visiting Committee, were aware of these allegations nor of what you describe as the school's ongoing approaches to them. If you had been taking specific action around the program, faculty training or communication to your

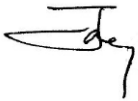
constituency, these should have been specifically noted in prior reports. Nor were we aware of potential mediation or the threat - whether or not it is carried out - of legal action. The Self-Study is founded on the

need for both thoroughness and transparency. We do believe the school had a responsibility in the Accreditation process to make these concerns known and to articulate steps being taken to address them.

It is not our policy to hold current leadership responsible for "legacy" issues at the time of their occurrence if the leadership was not at the school. That being said, it is the responsibility of current leadership to address these issues thoroughly and transparently and to convey to appropriate parties the steps being taken. We do understand that some issues may never be fully resolved to the satisfaction of all parties, either because of their distant occurrence or because some wrongs can never be fully redressed. Further action from NEASC will depend on the school's responses rather than a requirement that all parties agree that "enough" has been done. We reserve the responsibility to respond in the context of NEASC Standards and the school's documented steps.

We are always willing to discuss the school's Accreditation situation if further clarification of the process or timeline would be helpful. We will plan to visit the campus to follow up on the Special Progress Report and to clarify the school's ongoing ability to meet the Standards when the Covid threat has been lifted and the school's legal status and necessary investigations and, if necessary, mediations are no longer of concern.

Most Sincerely,



Jay S. Stroud  
Director of the Commission

JSS:nk