



Child Care Licensing Unit

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I. Program Information

STATEMENT OF FINDINGS

ISSUE DATE : 4/16/2025

VISIT DATE : 3/19/2025

VISIT TYPE : Licensed Complaint

CORRECTIVE ACTION PLAN DUE DATE : 5/7/2025

Name of the program : MPA at Rumney

Program address : 1765 Route 25 Rumney New Hampshire 03266

License No. : CCRB-06690

Licensing Coordinator : Darlene Avery

In accordance with RSA 170-E, the department finds non-compliance with the following statutes and/or rules:

II. Non-Compliance List

Regulation number : He-C 4001.22(b)(3)

Program staff shall not attempt to control any resident's behavior by actions which are humiliating, threatening, shaming, frightening, or otherwise damaging to residents.

Observation : Resident A and Staff A, B, C, and D confirmed that Resident A was placed on "room restriction" because of Resident A's failure to comply with the program's directions for discarding soiled disposable protective underwear. Program staff confirmed that "room restriction" was being used as a consequence in an attempt to have the resident change their behavior. Program records document that on March 10, 2025, Resident A stated that having to "look at their [disposable protective underwear] and deal with them makes [them] "feel like a baby," so [they] avoid it." Resident A reported that they were made aware of being placed on "room restriction" each day when returning from school by seeing the letters 'RR' written next to their name on a whiteboard, which was visible to all residents. Resident A further noted that, as most residents have been placed on "room restriction" at one time or another, all the residents were aware of the meaning of the letters, 'RR.'

Corrective Action Plan : Room-based restrictions that lack a clearly defined, time-limited task (e.g., a five-minute reset or structured time-out) shall not be used as a behavioral intervention unless the student has been assessed by the internal treatment team as posing an immediate risk to self or others. This determination is typically associated with a lapse in Problematic Sexual Behavior (PSB) treatment, which may elevate the risk

of initiating inappropriate contact with others. In cases where such high-risk behavior is observed consistently, an external team meeting will be convened to collaboratively identify and implement appropriate, therapeutic interventions to support the student. Students will continue to have open access to their assigned team members and may utilize the grievance process to express any concerns regarding behavioral interventions or restrictions. Regarding the practice of noting privilege levels on the main board in the Rumney program, this will remain in place, as it provides essential, real-time information for faculty to make informed decisions about student access to privileges. However, the framing of this practice will shift toward a strengths-based approach. Instead of emphasizing consequences, the board will highlight earned privileges in a positive manner. In instances where specific safety plans are required—such as those involving elopement risk ("run watch")—these will be noted clearly on both the main board and the daily routine sheets to ensure consistency and staff awareness.

Completion Date : 4/22/2025

Regulation number : He-C 4001.22(f)

Before any program staff participates in a restraint or the use of seclusion, they shall have completed a curriculum in restraint techniques that is designed to protect the resident from risk of harm to self, others, property, or the public.

Observation : RSA 126-U:1, V-a defines seclusion as the “involuntary confinement of a child alone in any room or area from which the child is unable to exit... . from which the child reasonably believes they are not free to leave.” Resident A stated that they were placed on room restriction for a five-day period, that the door to their bedroom was closed and unlocked but alarmed, and they never attempted to leave their room as they were not allowed to do so. Resident A confirmed that they were required by the program staff to remain in their bedroom, and they were not allowed to leave the room except to use the bathroom or to request water to drink. Resident A and Staff A, B, C, and D all reported that Resident A was placed on “room restriction” and was excluded from regular programming and prohibited from making telephone calls to their family because of undesirable behavior. No staff expressed that this measure was intended to protect Resident A or other residents. The department determined that placing Resident A on room restriction constitutes seclusion as defined in RSA 126-U:1, V-a. Additionally, the room restriction was imposed as a consequence of the undesirable behavior of Resident A, whose behavior did not pose a substantial and imminent risk of physical harm to themselves or others, in violation of RSA 126-U:5-a, which prohibits the use of seclusion as punishment or discipline.

Corrective Action Plan : All Rumney faculty authorized to implement Therapeutic Crisis Intervention (TCI) restraints are fully trained in the TCI curriculum and adhere to its protocols. The Rumney program will not utilize room-based restrictions as a behavioral intervention in the absence of a clearly defined, time-limited task for the student to complete (e.g., a five-minute reset or structured time-out). Such interventions will only be employed if the internal treatment team has determined that the student presents a significant and immediate risk to self or others. This is most commonly associated with a lapse in Problematic Sexual Behavior (PSB) treatment that may elevate the risk of initiating inappropriate sexual contact. In situations where a student demonstrates this elevated risk level on a consistent basis, an external team meeting will be convened to review the case and develop individualized, clinically appropriate interventions to ensure the safety and support of the student and those around them. Students will continue to have full access to their assigned treatment teams and retain the right to utilize the grievance process to voice any concerns related to interventions or program practices.

Completion Date : 4/22/2025

Regulation number : He-C 4001.24(c)

No resident shall be secluded at mealtime unless they pose a risk of harm to themselves or others.

Observation : Resident A reported that, during a five-day period when they were placed on “room restriction,” that dinner was brought to them in their bedroom, and they were not allowed to leave their room to eat their evening meal with their peers. Staff B and C confirmed that Resident A was brought meals in their room and that Resident A was not allowed to leave their room to eat dinner when they were on room restriction. Staff A reported that the program’s policy is that residents are allowed to leave their rooms to eat meals unless they present a risk of harm, but when asked specifically about Resident A, Staff A acknowledged that the resident may have been brought meals from the cafeteria. Documentation of the behavior that led to the room restriction indicated the seclusion of the resident at mealtime was a consequence for behaviors that did not pose a risk to themselves or others.

Corrective Action Plan : Students who are assessed to be emotionally and behaviorally stable at the time of mealtime—meaning they are not actively in crisis and are able to adhere to normative mealtime expectations—will be granted full access to eat in the communal dining room with their peers. This practice supports the development of healthy social interactions, routine participation, and a sense of community within the residential setting. Conversely, students who are unable to safely participate in meals with peers due to emotional dysregulation, safety concerns, or behavioral escalation will be provided an alternative, supervised location in which to eat their meal. Such spaces may include a clinician’s office or a designated residential office, where the student can receive individualized support and de-escalate in a more controlled environment. These decisions will be made collaboratively by the treatment team, with the student's safety and therapeutic needs as the guiding priorities. Whenever possible, the goal remains to reintegrate students into the group setting in a timely and supportive manner.

Completion Date : 4/22/2025