February 26, 2020

Department of Human Services
Office of Licensing
195 North 1950 West
Salt Lake City, UT84116

RE: Maple Lake Academy, LLC
License Number: 52446

RE: **Corrective Action Plan**

To: Hannah Schoen:

Rule Violation	Plan to Correct Violation	Date to Reach Compliance
R501-1-11. Licensing Code of Conduct and Client Rights (1) Licensees and staff shall: (f) not abuse, neglect, harm, exploit, mistreat, or act in a way that compromises the health and safety of clients through acts or omissions, by encouraging others to act, or by failing to deter others from acting; **Violation Description:** A staff member reported to a DCFS investigator that she did play a "titty twister" game with a client and the staff member further stated it was inappropriate and crossed a boundary. This was consistent with the client's report of the incidents.	1) We will have all employees review the Safety Training Module which includes training on appropriate boundaries and physical touch. This is required annually by all employees. We have implemented BambooHR, an online employee database, which will better track training records and we will ensure employees stay up-to-date with training or otherwise receive disciplinary action if they fail to do so. 2) A written warning was issued to the employee in violation of this policy. We will continue to hold accountable those who violate this policy, through verbal and written warnings, and up to and including termination of employment if warranted. 3) Remind all employees of appropriate boundaries with students, and to write an incident report if intentional or accidental touch was conducted.	1) BambooHR was implemented November 1, 2019; the training record portion was implemented February 11, 2020. 2) Employee was issued written warning on 2.10.2020, following an investigatory leave of absence 3) HR reviewed boundary standards with residential department on Jan 7, 2020 and sent out a company memo regarding incident reporting on Jan 6, 2020.
R501-2-9. Personnel Administration. C. The program shall have a personnel file for each employee to include the following: 10. a signed copy of the current Department of Human Services Provider Code of Conduct.	1) We send out the Utah DHS OL Code of Conduct annually to all employees for them to review and sign. We will continue to do this, and better hold employees accountable through disciplinary action if they fail to complete the annual review of the code of conduct. Likewise, each new hire	1) The Code of Conduct (2017 version) was sent to all employees on Jan 23, 2020 for review and signing. 84% have completed so far. We will seek

Violation Description: The last Utah DHS OL Code of Conduct document in an employee's file was signed in 2015; however, the employee has remained employed by the program from 2015 to present. Additionally, the code of conduct was updated in February 2017 thus the employee has not signed the most current form	is given the Code of Conduct to sign at time of hire. 2) We have implemented BambooHR to more easily send out and track the completion of each employee's review and signing of the Code of Conduct annually. BambooHR will also send out email reminders to each staff and manager at least monthly to notify of any training that is expired or coming up for renewal. 3) We have hired an HR Manager to better maintain employee records and to ensure training is better tracked and kept up-to-date.	100% completion by March 15, 2020. 2) BambooHR was implemented November 1, 2019; the training record portion was implemented February 11, 2020. 3) HR manager hired Aug 1, 2019
R501-2-9. Personnel Administration. M. Staff Training 1. Staff members shall be trained in all policies of the program, including the following: a. orientation in philosophy, objectives, and services, b. emergency procedures, c. behavior management, d. current program policy and procedures, and e. other relevant subjects. 2. Staff shall have completed and remain current in a certified first aid and CPR, such as or comparable to American Red Cross. 3. Staff shall have current food handlers permit as required by local health authority. 4. Training shall be documented and maintained on-site. **Violation Description:** An employee's first aid/CPR expired in December 2018, PCS certification expired in June 2019, and MLA safety models expired in June 2014. The employee's main role was in the marketing and advertising department; however, they continued to have contact with children as a life skills coach. The employee was instructed to not be alone with the children until their training was up to date however it does not appear this instruction was followed.	1) Employee in violation will complete all expired training. 2) Employee will no longer fulfill the role of the Life Skills Coach and focus solely on Marketing and Admissions. 3) We have implemented BambooHR to more easily send out and track the completion of each employee's review and signing of the Code of Conduct annually. BambooHR will also send out email reminders to each staff and manager at least monthly to notify of any training that is expired or coming up for renewal. 4) HR Manager will audit and work with managers and employees to ensure that all training records are up-to-date.	1) CPR/First Aid: will be completed Mar 26, 2020; Safety Modules were completed Feb 12, 2020; Code of Conduct completed Feb 11, 2020; PCS is no longer required for employee in violation as she no longer works directly with students 2) Feb 10, 2020 3) BambooHR was implemented November 1, 2019; the training record portion was implemented February 11, 2020. 4) In progress; anticipated completion by April 30, 2020…pending completion of scheduled training.

Thank you,

Nathan Smith
Human Resources Manager
Maple Lake Academy, LLC.
6612 South 3200 West
Spanish Fork, UT 84660

CC: Nichol Holwege
Program Manager
Maple Lake Academy, LLC.
6612 South 3200 West
Spanish Fork, UT 84660

Patti Hollenbeck-Dial
Clinical Manager
Maple Lake Academy, LLC.
6612 South 3200 West
Spanish Fork, UT 84660