

Please Note: Philadelphia Department of Human Services and Community Behavioral Health may have agency-specific implementation expectations. Where expectations differ between agencies, the answers are identified as “CBH” and “DHS.” Please refer to agency policy memos/bulletins for additional direction.

Answers that were given live and recorded are shown with an “answered live” comment. Any additional or clarifying information is providing below that response.

1. Is this timeline (giving guides within 3 hours of arrival and full review within 24 hours) apply to emergency after-hours placements also?

Live answer: Similar to the rest of the guidance, it’s important to do an initial quick review upon arrival for emergency/after-hours placements and then to do a more thorough review within 24 hours. Use discretion if youth are arriving at off hours to decrease the amount of stress and information overload. If youth are arriving at 3 AM, it is acceptable to do the initial review later, but still within the first 24 hours.

Additional Information: In these circumstances, the short guide can also be a support. Youth can be given the short overview so they have it as a comfort and to reference if needed, with the assurance that there will be more information shared in that day.

2. Will the guides be available in other languages?

Live Answer: Yes, the guides will be available in Spanish. They can be found here: <https://www.phila.gov/hhs/accomplishments/Pages/Guides.aspx>

3. How will the guides’ use be monitored?

Live answer:

DHS: The Documentation of Receipt signature page must be completed, included in the youth file, and shared with the Case Manager.

CBH: The guides will be integrated into youth interviews and treatment team meetings.

Additional Information:

CBH: The guides will also be monitored during on-site chart reviews.

4. Do we need to share these guides just with the youth that are new to placement starting in January, or are we expected to provide all youth with a copy?

Live answer:

CBH: It is expected that all youth in care receive these guides, starting with new admissions who arrive on/after January 15, 2020. By the end of February 2020, all youth in care (including those admitted before 1/1/2021) should have the guides.

DHS: A bulletin will explain specific timelines.

Additional Information:

DHS: Starting in January, providers should review the guides with all youth currently at the facility and all incoming placements.

5. Are these guides being used by probation for their youth and families?

Live answer: Yes.

Additional Information: These guides are for youth while they are physically residing at a 24/7 placement. Youth on probation in the community are exempt. Juvenile Probation Officers should be aware a youth in a delinquent placement may contact them for concerns, as listed on the grievance chart. Like a case manager, the JPO should be aware that youth will receive the rights guides and can confirm receipt. The guides DO apply to youth at the Philadelphia Juvenile Justice Services Center (PJJSC).

6. Are the guides going to be provided to the youth and families at the time of referral, so they know their rights prior to placement, or is it only after youth are referred, accepted, and placed?

Live answer:

CBH: The guides should be given and reviewed once the youth is placed in residential placement. The guides could be included as part of pre-admission engagement, but this is not a requirement.

DHS: The guides should be given “in real time”, and the court case manager has a responsibility to facilitate this.

Additional Information:

DHS: The guides are given upon arrival at the congregate facility, since these rights are specific to residential services. The case manager will have gone over general rights using DHS' *Rights In Care* brochure. All resources are available on DHS Forms and DHS Connect.

- 7. There are times when emergency placement is not given the parents contact information for a few weeks and sometimes not at all. Should we document this on the form?**

Live answer: Yes

Additional Information: Providers should also document their efforts to locate guardian contact information if delayed in receiving.

- 8. Regarding page 4, My Child's Team, is there a way we can get all the team members names. Often, we do not get Child Advocate, Judges, EDM, etc. information in timely manner.**

Live answer:

DHS: The CUA Case Manager should be able to provide most of this information. Additional contact information for the Education Support Center will be included in the DHS policy memo. All CUAs have been informed that one of their roles is keeping contact information up to date, so providers can include all team members information when the guides are given to youth and families.

Additional Information:

DHS: CUAs have been reminded of the need to have up to date contact information in the case record, so that the most up-to-date information is part of the placement referral. The Education Support Center can assist in identifying the child's EDM (educational decision-maker).

- 9. If we have our own grievance process, are we required to follow the procedures outlined in the guides? Are we allowed to keep using our process?**

Live answer: The charts in these guides provide additional information about where youth can go to access help outside of your facility. Youth felt strongly that it was important that the grievance process outside of each specific facility be made available.

Additional Information: Yes, providers should continue to use their facility-specific grievance procedure. The grievance chart in the guide will inform youth of external avenues to raise any concerns.

10. When will the updated audit tool be forwarded?

Live answer:

CBH: There is no published audit tool on the CBH side.

DHS: We will be reaching out and communicating with provider agencies about how this will be incorporated into our process. We will have check-in conversations about the guides throughout next year (FY21), and the guides will be formally incorporated into the FY22 evaluation tool.

11. Is there a reason that CBH and DHS will not share the rights with the families and youth prior to agreeing to placement? Both [youth] members spoke about not being adequately informed and prepared upon the day of admission.

Answer:

DHS: Ensuring youth understand their rights and what is occurring is a shared responsibility and collaboration between City agency staff and providers. The guides are given upon arrival at the residential facility, since these rights are specific to residential services and there may be specific provider policies to discuss in tandem. It also allows the youth to ask more situationally relevant questions. The CUA case manager will have gone over general rights using DHS' *Rights In Care* brochure.

12. For dependent youth will it be the placement's responsibility to provide and go over it with the family or CUA/DHS's responsibility?

Answer:

DHS: the provider should review the guides with families as much as possible, to support establishing family engagement. If the provider is unable to reach a parent or family member, the case manager should assist with contact.

- 13. Our agency does not have the ability to mass print color copies. Can a black and white copy of guide be provided?**

Live answer:

DHS: The guides have been prepared in Printer Spread form that will print as a booklet. They can be easily assembled through an in-house printer or using printer services at a office supplies store.

Family members emphasized the importance of getting these guides in the hands of youth, regardless of being printed in color or black and white.

Additional Information: While printing in color is the preferred style to increase engagement, printing in black and white is acceptable. To print in-house: use the version labeled “PS” for printer spread; select print on both sides, flip on short edge; print and fold.

- 14. Will you be emailing the individuals in this training the direct Guides that we can forward along to our Team Members and also to send through email to parents?**

[Philadelphia Youth Residential Placement Rights Guides](#)

[Resources For Parents](#)

- 15. Will there be a breakdown of the timeframes that these guides must be met, so that we can also forward them directly on to make sure we meet those timelines?**

Live answer:

Guides should be implemented beginning 1/1/21. For CBH, training is expected to be completed by Feb. 15, and by the end of February, all youth should have received these guides. On the DHS side, their bulletin references more specific timelines.

Correction: CBH providers are expected to begin using the guides by January 15, 2021.

- 16. Will Juvenile Probation Officers be responsible for also ensuring that parents / families have these guides?**

DHS: We will be giving a presentation to JPO about these guides so they know their role in supporting use of the guides. Youth are still expected to receive the DHS rights in care brochures.

- 17. It is nice to hear that this is intended to be a total collaborative effort but it seems that the responsibility as written only falls on the provider to deliver and then show evidence of delivery.**

Answer:

DHS: These are rights specific to residential services, based on state licensing guidelines and contract expectations. Therefore, the provider needs to be the lead, while case managers or JPOs assist with follow up, including outreach to families, as needed. CUA/Case managers also have a responsibility to partner with providers to follow-up with case information, share contacts and ensure youth received and understand the rights information.

- 18. When is staff training expected to be completed?**

Live answer:

CBH: Training for staff must be completed by Feb. 15, 2021

- 19. Do the guides apply to supervised independent living youth?**

Live answer:

DHS: Supervised (SIL) youth should know information from certain elements covered in these guides, like the grievance chart/procedure and the education items. However, since these guides were written from the state 3800 regulations specifically for residential placement, the guides do not directly apply to SIL.

Additional Information:

SIL providers are required to share their internal grievance procedures, use of these Rights guides is optional.

- 20. With regards to clothing, the State regulations require agencies to provide appropriate and seasonal clothing. Also, agencies are required to provide appropriate personal hygiene products. I have some concerns with the language in the guide with regards to this. Agencies need the ability to purchase items that are of good quality at a price that is affordable.**

Answer: In addition to the State regulations, both the DHS Congregate Care Scope and CBH Standards reference ensuring youth have appropriate hygiene products and clothing, as well as providing youth with culturally appropriate, sensitive, and responsive care. (DHS Scope pg. 6 - 9, CBH Standards pg.4, 7, 22-23). For many

youth, especially LGBTQIA youth and youth of color, having appropriate clothing and hair products is necessary for their hygiene and reflects an extension of their identity. Providers should not feel like they have to buy expensive items outside of their normal budget but must take care to purchase products that reflect the identities of youth in their care.

If there are any questions or you are looking for DHS policies regarding this topic or any other, please contact : DHSpolicy@phila.gov

21. Does the guide say the youth have a right to get all of their belongings returned to them at discharge?

Answer:

Yes, youth have the right to receive back all their personal belongings when they are discharged, so long as the items are determined to be safe.

22. Does the guide address whether or not youth over 14yr can add whoever they want to their phone list?

Answer:

No, the guide does not address who the youth may add to their phone list as it is not specified in regulations or contract/standard requirements. It does address the right to family and community connections and right to communication, depending on safety and court requirements.

23. How should we proceed with getting family members signatures if they are not present during admission?

Live answer:

DHS: Two documented attempts to contact family members about these guides are required. The guides can also be mailed to family members.

CBH: There needs to be documented attempts to contact parents and share the Rights Guides. The guides could also be read over the phone or through a video call. At some point during treatment, you will likely have an in-person contact with parents or guardians and the signatures/distribution of physical copies could be taken care of at that time.

24. Will you be sending out a recording of this training?

Live answer: Yes, a recording of the Zoom webinar will be sent.

Additional Information: [The recording can be found here.](#)

25. Is there a specific training curriculum that you expect Providers to utilize when training our staff on these new guides?

Live answer: There is no specific curriculum, but the video recording of this webinar could be used in training.

Additional Information: Please see the location of the recording above.

DHS: The DHS Policy and Procedure document will be released soon with further guidance for providers.