STATE OF RHODE ISLAND
OFFICE OF THE CHILD ADVOCATE

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February 17, 2026

RE: Ocean Tides' Response to the Office of the Child Advocate

Dear Mr. Sullivan,

The Office of the Child Advocate (OCA) is following up on the report issued to Ocean Tides on July 10, 2025, and the subsequent response received from Ocean Tides on October 3, 2025. Following the issuance of the report, Ocean Tides was provided with ample opportunity to address the concerns identified by this office. It has been almost twelve (12) months since the OCA initiated the review and started to provide feedback to both Ocean Tides and the Department of Children, Youth and Families (DCYF). Given the nature of the issues raised and the content of the response submitted, the OCA finds it necessary to provide a written reply to clarify its recommendations and expectations.

Pursuant to Rhode Island General Law (R.I.G.L.) § 42-73-7(4), the OCA has conducted site reviews since the office's inception in 1979. The process of these reviews has changed over time and grown to be more in depth to ensure the rights of children are being upheld, each facility is adhering to the highest quality of treatment for each youth and DCYF Residential Child Care Regulations for Licensure (hereinafter "DCYF Licensing Regulations") are adhered to for all youth placed in each location. These site reviews are thoughtfully planned and carried out with the highest level of integrity and professionalism, and always with the goal of ensuring agencies entrusted to care for children are maintaining the same. In addition to unannounced drop-in visits at programs, the OCA completes over twenty (20) in-depth site reviews yearly both in-state and out-of-state. In almost every instance where the OCA has provided findings and recommendations, the provider has been responsive and willing to work collaboratively with our team and DCYF to rectify the identified issues and make any necessary changes to ensure compliance with regulations and promote the safety and well-being of children in their care.

The OCA outlines the site review process in the initial email notification of our visit and reiterates the process upon arrival. The OCA has included the letter/email sent to Ocean Tides in preparation for the site review. Please see Appendix A. Most site reviews are completed in one day, however

when information is incomplete or regulatory concerns arise within in an agency, the review may require multiple visits. The OCA required five (5) visits to Ocean Tides to complete the site review. The OCA is not required nor is it regular practice to discuss any findings related to visits while on site. The OCA carefully reviews all information gathered throughout each visit and reports all findings and recommendations in a final report, which is provided to the program, DCYF, and the Rhode Island Family Court. As with all site review reports, each assertion and finding herein is substantiated by a comprehensive evidentiary record, including on-site inspection, collection and examination of documentation, interviews with staff and youth, review of video footage, and analysis of DCYF records. The OCA possesses and maintains all supporting evidence.

Ocean Tides' response repeatedly emphasizes that certain operations have been in place for over 50 years; however, longevity does not justify the continuation of practices that may no longer align with current best practice standards. The fact that these practices have existed for decades does not preclude the need for change. Policies and procedures must be regularly reviewed and updated to reflect evolving best practices. The OCA expects that the recommendations provided will be given due consideration and acted upon accordingly.

This correspondence will address the questions and concerns raised by Ocean Tides in the order in which they were presented in the response.

Ocean Tides' Response Regarding the Use of Restraints

The OCA raised significant concerns regarding the use of restraints and the regulation of such at Ocean Tides. The response from Ocean Tides incorrectly indicates that the OCA is recommending Ocean Tides to "...abandon the restraint free model that has worked for the last 50 years." This was not the recommendation of the OCA. Following a comprehensive review of incident reports (IRs) and video footage, the issues discovered present violations of both licensing regulations and R.I.G.L.

R.I.G.L. § 42-72.9-3 defines a therapeutic physical restraint as "the acceptable use of a staff member's body to immobilize or reduce the free movement of a child/youth's arms, legs, torso, or head, in order to ensure the physical safety of a child/youth or other individual in the facility. The term does not include: (i) briefly holding a person in order to calm or comfort the person; (ii) restraint involving the minimum contact necessary to safely escort the person from one area to another." While Ocean Tides claims to be a restraint free facility for over 50 years, the IRs and video footage reviewed by the OCA indicate otherwise, depicting and documenting incidents that would meet the statutory definition of a restraint, with numerous hands-on incidents captured on video. For example, one video reviewed showed a staff member holding a youth up against a wall, using their body.

Ocean Tides claims that "Ocean Tides staff employ practices to break up fights between youth that are not a physical restraint, but rather the natural response to separate individuals who are fighting." This presents several issues.

First, any time an adult puts their hands on a youth for any reason, a protocol must be followed and appropriate techniques utilized throughout the duration of the hands-on event. In accordance with R.I.G.L. § 42-72.9-7(a)(1), facilities shall "Develop policies and procedures that establish

monitoring, documentation, reporting, and internal review of the use of restraint and seclusion on children." Furthermore, in accordance with R.I.G.L. § 42-72.9-6(b) "Each covered facility shall: (1) maintain a weekly log of the use of physical, mechanical, or chemical restraint or seclusion on children in their care and the nature of the emergency that necessitated its use, and (2) include that information in an annual compilation on its use of restraint and seclusion." The DCYF Licensing Regulations Sections (3)(VI)(L)(4), (5), (6)(g), (6)(j), (10), (11), outlines requirements for policies, procedures, documentation and annual reporting with respect to physical restraints.

Ocean Tides' failure to identify hands-on incidents as restraints, has led to a lack of adherence to the provisions of R.I.G.L and the DCYF Licensing Regulations. Throughout the OCA's site review process, the OCA did not observe any of the required documentation as required by R.I.G.L. and the provisions of the DCYF Licensing Regulations when physical restraints or seclusion are utilized. Strict compliance with governing laws and regulations are required to ensure the safety and well-being of youth and staff.

Additionally, it is reported that all staff are trained in Therapeutic Crisis Intervention (TCI). The video footage, documentation and the de-escalation techniques described, reflected interventions that do not comply with TCI training. Failing to adhere to a model with fidelity has the potential to place youth and staff in danger. The Residential Child Care Regulations for Licensure, Section VI. (L)(4)(f) state, "The Department will not recognize the adaptation or modification of any model without the written approval of the organization that developed the model." The OCA is not aware of any approval for adaptation of the model. Therefore, the model must be strictly adhered to.
Lastly, while disputed by Ocean Tides, the OCA staff reviewed hours of video footage showing youth assisting staff in breaking up fights. All youth interviewed reported that they help intervene in fights and are rewarded by staff for doing so. For instance, youth stated they have regained weekend passes after assisting staff during altercations. Staff interviews corroborated these accounts, with staff confirming to OCA that youth are rewarded for intervening in fights.

Ocean Tides' Response Regarding the Population Served

Ocean Tides' response indicates the facility "...works with a population that the state has otherwise concluded needs to be kept in a secure locked facility with mechanical and physical restraints."
In accordance with the Children's Bill of Rights and federal law, all youth have the right receive treatment in the least restrictive setting. According to their contract with DCYF, Ocean Tides is a Residential Treatment Center which provides treatment to youth accepted to Ocean Tides through the DCYF referral process. While this includes youth experiencing the juvenile justice system, this also includes youth experiencing the children's behavioral health and child welfare systems. Currently, Ocean Tides is operating with a heightened focus on punishment, not treatment, based on the documentation reviewed by the OCA, visits to the program, and interviews with youth and staff. Ocean Tides contract specifies, "OT will use trauma informed: neuroscience aligned services provided in a Lasallian Culture of Care." Further, the contract states that "Our CARF accredited and PREA compliant RTC model will provide milieu therapy with structures and services to effectively address the reasons for placement using a comprehensive array of strength and evidence-based therapeutic modalities designed to offer hope, foster growth, and improve the lives of the male adolescents and families we serve." Based on the response from Ocean Tides regarding the population they believe they are serving, this is not aligned with their current contract with

DCYF and following a review of Ocean Tides' policies and procedures, they are not operating in accordance with the language that is cited above from their current contract.

Response to Factual Inaccuracies Identified by Ocean Tides

Relative to Ocean Tides assertion of "Factual Inaccuracies in the Site Report" as noted earlier, the OCA stands by the information reported and possesses all documentation, video and/or audio footage to support all information reported in the site review.

Ocean Tides' *Issue 1*: "*All doors in the building lock (with the exception of resident dorms), and doors that separate the public from residents exist and do lock.*" During the site review period, as well as on subsequent visits to Ocean Tides the OCA was able to walk throughout the building undetected and without being stopped by staff. During the OCA's visit on October 23, 2025 one OCA staff member walked throughout the entire building and was able to gain access to the gym where youth were engaged in activities. An Ocean Tides staff member was present. The OCA staff member introduced themselves to the Ocean Tides staff member. No identification was requested to verify this information. When the OCA staff member indicated, they were going to look for the restroom, the Ocean Tides staff member requested that a youth escort them to another area of the building. Additionally, Ocean Tides administration directly informed the OCA the building does not lock due to the chapel being open to the public.

Ocean Tides' *Issue 2:* *"There is no documented request found for our Urine Screen Policy- additionally on page 8- OCA outlined Policies and Procedures they requested. This is not included in the list. A copy has been provided in attachments to this letter"* To clarify, this was not a request in our initial letter, but a subsequent request made twice via email. Pursuant to the OCA's statutory authority, the OCA can request documentation pertaining to the treatment and care of children at any time. As a part of our site review process, additional requests for information may be necessary. The OCA acknowledges receipt of the policy, provided with Ocean Tides' response.

> **New Issue Identified:** On January 28, 2026, during a drop in visit, the OCA was informed that the screening process has since been revised to include the swabbing of youth. It was noted that urine screening is now supplemental to this process. Ocean Tides Administration advised the OCA that they started to swab the mouths of youth to test for drugs in approximately November, but DCYF had not been notified of this change in screening. Ocean Tides' policy also had not been updated to reflect this change. Accordingly, this policy should be updated to reflect current practices and once updated, the new policy should be forwarded to DCYF and the OCA.

Ocean Tides' *Issue 3:* *"Attached are redacted samples of notes in Treatment Plans and Treatment Reviews referencing Substance Use Treatment that are part of the Main Files. These samples provide are of youth who were at Ocean Tides at the OCA's time of visit."*

No attachments were provided with Ocean Tides' response to support this statement. Upon the OCA's review of youth's files and treatment plans, there was no clinical documentation or notes included to suggest substance use treatment was occurring as reported by Ocean Tides. Detailed documentation of clinical treatment provided to youth should be in the youth's file.

Ocean Tides' *Issue 4:* *"Ocean Tides has a full-time janitorial and maintenance staff. The janitorial staff work from 3pm-11pm and clean the Ocean Tides facility. Maintenance staff work 8am-4pm and handle all repairs and maintenance of the facility. The youth are responsible for daily housework that consists of the dorm area, gym, and TV room. These chores involve about 15 minutes' worth of work each day and contribute to the $30 allowance residents earn for their home pass."*

The OCA is seeking clarification from Ocean Tides regarding this issue. The OCA's reviewed the documentation provided by Ocean Tides. On page ten (10) of the Social Services Handbook, it states:

"Building Guidelines

Since we do not have a full-time janitorial staff here at Ocean Tides, each person's concern and attention to the building becomes even more important than it might need to be elsewhere."

If Ocean Tides is indicating that there is in fact a full-time janitorial staff, then Ocean Tides' own documentation should be revised to reflect this. This documentation, coupled with the practices discussed with Ocean Tides Administration where it was clearly stated youth are responsible for cleaning the property as part of their chores, as described in Ocean Tides' response above, led to this conclusion. Additionally, a review of documentation provided to the OCA by Ocean Tides involving sanctions indicates youth work off their "time" by completing additional chores, and for those youth that have a late van or their weekend passes revoked must participate in the Weekend Work Program. This requires youth to complete chores that are in addition to daily chores.

If there is in fact a full-time janitorial staff, the OCA requests the Social Services Handbook be updated to reflect this change. Additionally, the OCA is seeking more clarity regarding daily chores, the expectations of youth participating in the Weekend Work Program, and chores given to work off sanctions.

> **OCA Request:** Please describe how these expectations compare to the daily duties of the full-time janitorial staff. Thank you in advance for providing clarity regarding this issue.

Ocean Tides' *Issue 5:* *"OT RTC informed the OCA that we had ordered a medication cart and were waiting for its delivery. Since the OCA visit, the medication cart has been delivered and is in active use."* The OCA appreciates Ocean Tides' follow-through in obtaining a medication cart.

Ocean Tides' *Issue 6:* *"The report did not include the action that OT RTC took in response. This included contacting the DCYF Hotline, suspending the staff member for three days, other corrective action taken, review of Agency Policy, letter written regarding the staff member's conduct and filed with Human Resources and included in the employee's personnel file.* The OCA was documenting a call to the Child Protective Services Hotline (hereinafter "Hotline"). The OCA did not make declarations about Ocean Tides' follow up or lack thereof. This was simply an overview of a Hotline call. The OCA appreciates Ocean Tides' response following the incident. However, the conduct at issue still constitutes a licensing violation, which was documented as part

of our review. Specifically, this is a violation of DCYF Licensing Regulations, Section VI. Program Requirements, B(3), Confidentiality which states that "there will be no written, verbal or electronic communication regarding confidential matters unless necessary to ensure safety and treatment."

Ocean Tides' Issue 7: *"This refers to the Master Control Center at the Rhode Island Training School that is referenced in RIDCYF Policy and Procedures.* The OCA appreciates this additional information but would suggest providing further clarification in the Ocean Tides AWOL Resident Policy. The policy does not explain what the Master Control Center is and does not describe the purpose of this call. Additionally, the AWOL policy seems to only outline a process for youth experiencing the juvenile justice system. Given its status as a Residential Treatment Center, youth are placed there for treatment with no juvenile justice involvement. This is not a requirement for admission into Ocean Tides. Therefore, the AWOL Resident policy should outline a clear process that is applicable to all youth.

Ocean Tides' *Issue 8:* *"OT nurse is included on all IR's and documentation was provided to the OCA confirming follow up. This included both email correspondence and nursing notes as evidence of medical care being provided."* The OCA is in receipt of several IRs indicating that youth appear to be under the influence and there is nothing noted in these IRs mentioning nursing being notified or evidence the youth was medically cleared. The "Follow Up" section of several IRs are blank, which when reviewing, would reasonably indicate there was no follow up. It is important to note the OCA did not receive any nursing notes with the IRs provided as indicated in Ocean Tides' response. However, the OCA remains steadfast that all IRs be filled out in their entirety with all pertinent information readily available on the IR form. Staff are not consistent in completing IRs. None of the polices or protocols provided by Ocean Tides state that IRs are forwarded to the nursing department. If this is the expectation, then this should be clearly outlined in the policies pertaining to IRs to ensure consistency in practice among all staff. Ocean Tides Administration advised OCA staff that IRs are for internal use only and not for outside agencies to review. However, in accordance with the DCYF Licensing Regulations, Section V. (A)(2)(n) IRs are to be maintained as part of each child's facility case record. Pursuant to Section V. (A)(5), DCYF, the Office of the Child Advocate, and any assigned Court Appointed Special Advocate will have access to all records of children in care. Additionally, in accordance with Section V. (A.) (6) this "...case record information may be used for Facility quality assurance and accreditation purposes..." Therefore, compliance with the DCYF Licensing Regulations dictates that IRs are not for internal use only and it is imperative that they provide a complete and thorough report of any incident, including appropriate follow up taken in response.

Ocean Tides' *Issue 9:* *"As mentioned previously the OT nurse is included on all agency IR's when they are distributed as are all executive team staff, management team staff and residential staff."* Please see the OCA's reply to Issue 8.

Ocean Tide's Responses to the OCA's Recommendations:

Please see the below feedback to Ocean Tides' responses to the OCA's site review recommendations.

OCA Recommendation: The OCA recommends completing overnight checks of youth at least every thirty (30) minutes. Staff must see the youth in their bed. Staff must be positioned in the dorm hallways to monitor any activities that may occur in addition to watching cameras in the office. The OCA further recommends oversight by Administration to ensure checks are completed every thirty (30) minutes.

OT's Response- Logs have been updated for consistency through every shift and documentation continuity. This is a good example of the challenges of striking the balance between privacy and safety. Staff confirm youth to be in their bed by visually seeing a limb. Further, OT believes that opening a sleeping youth's door every 30 mins of the night will be disruptive to their sleep, and many are seeking psychiatric care for this specific issue. Nevertheless, OT will make the change to 30-minute checks on the Overnight.

While staff certainly need to be vigilant in the supervision of youth, stationing staff in the hallway all night is again going to be disruptive to youth's sleep. Hallway lights are currently off unless triggered by motion in the hallway and staff in the hallway are going to be talking directly outside youth's rooms. The staff offices allow visual monitoring of both hallways. External windows cannot be monitored from the hallway and either must be monitored by camera or by staff circling the dorms outside

The OCA maintains this recommendation and has not encountered any other programs in-state or out-of-state that are not doing in person, visual confirmation, room checks during the overnight hours. No other agency has identified this practice as a problem or concern.

Ocean Tides Administration reported that all youths' bedroom doors are required to remain closed at night, making it unclear why stationing staff in the hallway would be disruptive to a youth's sleep. Ocean Tides Administration further stated youth go AWOL from their bedroom windows during the night, a concern corroborated by numerous IRs received by the OCA documenting youth leaving through their bedroom windows. Ocean Tides should conduct in-person visual room checks to ensure youth are present in their rooms and not AWOL. Additionally, during overnight hours, it is unclear why staff need to be talking outside of youth's room to the extent it would be disruptive to a youth's sleep. As Ocean Tides states above, the cameras do not monitor the external windows, this further supports the OCA's recommendation of visual body checks every thirty (30) minutes.

OCA Recommendation: The OCA recommends in-person visual monitoring of youth at all times and staff must not rely on video cameras to monitor the youth. Administration and senior staff must ensure adequate supervision is occurring.

Ocean Tides response- *OT video surveillance system compliments in person supervision of youth. Staff are vigilant in their efforts to monitor all youth. They should not be on their phone or otherwise distracted, and youth should not be allowed to congregate without supervision, which has been consistently reviewed with staff and supervisors.*
To be clear, however, Ocean Tides is not a secure facility that requires escorts and youth are allowed to move from one section or area to another unaccompanied. Counts of youth are done every 20 mins during the awake hours and youth are in direct supervision of staff while on campus.

The OCA maintains this recommendation and requests further clarification on policy and procedures for the supervision of youth at Ocean Tides. It is noted that "...youth are allowed to move from one section or area to another unaccompanied". However, Ocean Tides' response also notes that "...youth are in direct supervision of staff while one campus." This response is contradictory and does not provide a clear picture of the expectations of staff for the direct supervision of youth.

OCA Recommendation: The OCA recommends identifying a comprehensive training related to gangs that will be provided to staff upon hire and annually thereafter. Support and education regarding gang involvement should be provided for all youth.

Ocean Tides response- Ocean Tides is invested in improving its capacity in this area, but we are not aware of a specific Rhode Island related curriculum. Meanwhile, Ocean Tides has the Non-Violence Institute speak to youth and staff and will certainly do so again. OT participates in collaborations with other stakeholders in sharing information, interventions and resources on gangs.

The OCA did not advise or recommend a specific curriculum. Our recommendation was for Ocean Tides to identify a training to provide this support and education to both staff and youth. There are numerous nationwide gang trainings available to community agencies, as well as trainings that are specifically for youth. Ocean Tides' response identified that the Non-Violence Institute met with youth and staff. This was not previously mentioned to OCA staff during the review. We would request additional details regarding the support provided.

> **OCA Request:** Please provide the OCA with the date of the last visit by the Non-Violence Institute, how often this occurs and what information was presented by the Non-Violence Institute.

Following the OCA's review of Ocean Tides and the subsequent response to the OCA's report, we maintain that identifying a comprehensive curriculum to provide support and education related to gang involvement is critical.

OCA Recommendations: The OCA recommends a comprehensive list of sanctions be defined. Expectations and specific "time" are to be outlined and defined in protocol that all staff are required to follow. This should be available to all youth upon admission. This protocol must be included and consistent with the Sanction Policy. Any additional "time" given to youth must be documented in an IR, the sanction log, and in accordance with policy/protocol.

The Sanction Policy must identify a clear limit of how much "time" a youth can accrue.

The OCA recommends identifying a specific, and clear number of minutes taken away from youth's "time" for individual chores. This will ensure all consequences are consistent for all youth. Youth are responsible for daily chores and should not be solely responsible for the cleanliness of the entire facility. Documented protocols will ensure consistency within the program for youth and staff.

The OCA recommends staff are consistent in filling out the chair time log with a start and end time. This will ensure Ocean Tides is in compliance with DCYF Licensing Regulations regarding time-outs and ensure youth are being given credit for every minute spent in the chair. The OCA further recommends youth are informed they do not have to exceed twenty (20) minutes sitting in the chair. If a youth chooses to remain in the chair, this is limited to no more than one (1) hour daily.

The OCA recommends individualized, therapeutic motivators for youth, particularly for those who are unable to go home on weekend passes to align with the Lasallian Culture of Care as described by the information within the Lasallian education and framework.

The OCA recommends Ocean Tides develop a pro-social behavior modification system for youth that is evidence based for positive outcomes. Consequences and corresponding behavior modification must be consistent and clearly defined for all youth and staff. Additionally, the OCA recommends more positive reinforcement tools be used with youth to encourage engagement in youths' treatment plan and goals. This should align with the Lasallian Culture of Care.

Ocean Tides response- The Sanction Policy and Resident Handbook now have consistent information. OT believes that consistency is important, and each youth should be treated equitably and fairly. Treatment is also individualized and not every circumstance is exactly the same. Much of the work that is done to get a struggling youth back on track is not going to be found in a rigid, "one size fits all" list of rules or a policy. It is found in conversations with staff, clinicians, administrators and the youth about why they are making the choices they are making, what other choices they have and understanding the consequences of those choices. OT strongly disagrees with the OCA's unsubstantiated assertion that "This further reiterates the ineffectiveness of sanctioning and lack of therapeutic interventions and conflicts with the Lasallian Culture of Care." Correction and discipline are very much a part of the Lasallian Culture of Care and central to the success of the Ocean Tides program over the last 50 years. Youth are sent to Ocean Tides to change their behavior. We do have youth who in their own words "Crash Out." They are no longer motivated to earn the positive opportunities the program offers and choose to simply get by with the minimum. Youth can respond positively from the program here and get back on track, and they often do, though for some it takes some time and individualized motivation.

The OCA was provided with a list of specific behavior and the specific recommended time infractions for the behavior. Additionally, it is posted throughout the dorm, so the youth have

clear guidelines as to the consequences of their behavior. These specific infractions will additionally be added to the Resident Handbook to provide residents with further clarity. While OT believes in setting limits it also recognizes that this tool has limits to its effectiveness. As we do with the opportunity to earn weekend passes in the community, Ocean Tides will set some maximums on sanction time and provide staff with other options to document negative behavior.

Youth are responsible for daily housework that takes about 15 min to complete. This is an important life skill and one they are encouraged to do at home on pass and when they return to the community. There is a revolving list of chores to be done. The facility employs full-time maintenance and janitorial staff, notwithstanding OCA's inaccurate comment on this is inaccurate. OT also provides youth with the opportunity to earn wages in its on-campus employment programs which supports the periodic in-depth cleaning of spaces here.

The OCA stands by this recommendation and maintains our significant concerns regarding the use of sanctions. Ocean Tides indicates the Sanction Policy and Resident Handbook now have consistent information. The OCA appreciates these updates and would request these updated materials be provided to the OCA for review. However, the OCA maintains that the use of sanctions at Ocean Tides is not aligned with best practice. The documentation provided by Ocean Tides and conversations with youth indicate the sanctions were ineffective and overly punitive. The OCA acknowledges Ocean Tides' disagreement; however, these assertions were substantiated by youth, staff and a thorough review of Ocean Tides documentation.

During discussions with the OCA, Ocean Tides Administration stated youth are responsible for cleaning the property as part of their chores. Additional documentation provided to the OCA by Ocean Tides involving sanctions, indicates youth work off their "time" by completing additional chores, and for those youth that have a late van or their weekend passes revoked must participate in the Weekend Work Program, which also requires youth to complete chores that are in addition to daily chores.

Additional Issues Identified: The OCA has continued to monitor the use of sanctions at Ocean Tides following the issuance of this report. There have also been several calls to the Hotline regarding concerns with sanctions. Despite the acknowledgement that consistency is important, the OCA has continued to find the use of sanctions to be inconsistent and in many instances overly punitive. The use of sanctions is not aligned with residential best practice. The OCA has completed additional monitoring visits at Ocean Tides and as a part of the visit reviewed sanction logs, interviewed staff, and interviewed youth.

For example, it was documented by OCA staff that one youth had accrued over two hundred (200) hours of sanction time, rendering it impossible for this youth to work off the time and earn back privileges. Further review showed that by receiving this number of hours for sanctions, the youth was unable to utilize weekend passes to go home and visit with family.

It is the understanding of the OCA that the youth's family had difficulties with getting to the program to visit with the youth, which resulted in a lack of visitation and engagement with family. Family engagement is a critical part of any therapeutic experience. The OCA questions at what point this use of sanctions would be considered a hinderance on the youth's progress.

Additionally, at a visit on January 28, 2026 OCA staff inquired about the provision of a sixty (60) minute sanction for a youth's failure to shower. In reviewing this sanction with the policy and corresponding list of sanctions, this is the most time a youth can receive and is the same sanction for fighting, smoking, threatening another resident and instigation. In fact, Ocean Tides' Sanction Policy states, "[n]o sanction should be more than one hour, and this should be reserved for the most significant of infractions, e.g. fighting, AWOL, stealing, licit or illicit substance use or possession of related contraband." The OCA staff expressed concerns to Ocean Tides Administration regarding the use of such as severe sanction for an action that could be deeply rooted in the youth's mental health. The OCA also inquired whether there was clinical follow up with the youth to assess the state of their mental health. It was indicated by Ocean Tides that this did not occur.

There was expressed disagreement from Ocean Tides Administration and Residential Coordinator with the OCA's position regarding the use of sanctions generally and the specific application in this case. Upon review of the Sanction Log and Communication Log, the OCA inquired if there were corresponding IRs associated with each sanction. Ocean Tides Administration indicated that this was not the case. A review of IRs showed they remain inconsistent with the information provided and they are not fully completed. Incident reports did not correspond with sanction time. Youth can receive sanctions without any documentation in an incident report.

In prior visits, the loss of weekend passes to visit their families was a concern consistently raised by youth. Through interviews at multiple monitoring visits, youth describe the process of the loss of weekend passes. Some described losing multiple weekend passes for once incident. For example, one youth described losing four (4) weekend passes for one incident. Youth also expressed that expectations were not clear and varied depending on the staff working that day. Youth also described staff as antagonizing, argumentative, or on "a power trip". Youth also explained that they now must work off sanction time minute for minute. For example, if a youth receives a sixty (60) minute sanction, they must complete sixty (60) minutes of chores to have their sanction time eliminated. Youth indicate that this was not always the case.

Furthermore, at the visit on January 28, 2026, OCA staff were advised that Ocean Tides revokes youth weekend passes to visit with family as a form of punishment. A review of the Ocean Tides' Sanction Policy clearly outlines this practice. The OCA brought to the attention of Ocean Tides Administration that unilaterally revoking weekend visits by the

program is a licensing violation. In accordance with the DCYF Licensing Regulations, Section VI (F)(6), "[i]f the facility perceives a need to limit the child's visitation or communication in any manner, Facility staff will: (a) Consult with DCYF to determine if the limit is appropriate. (b) Inform the child of the reason for the limitation or termination of the child's ability to communicate with specified individuals. (c) Document the decision in the child's case record. (d)Review the decision at least every three (3) months."
Ocean Tides Administration indicated that the OCA was welcome to their "interpretation of the regulations". The OCA clearly indicated and showed Ocean Tides Administration the relevant licensing provision. The OCA was advised that "everyone knows this is how we do it." Ocean Tides Administration also indicated that DCYF/Probation is not always available, so they update workers when Ocean Tides revokes a visit, and it has never been an issue.

OCA Request: In response to the persistent issues with the use of sanctions, the OCA recommends that Ocean Tides engage with outside technical assistance and support in restructuring this aspect of the program. As noted, the use of sanctions does not align with residential best practice and the use of sanctions should not continue.

OCA Recommendation: The OCA recommends the practice of youth removing clothing for person searches and videotaping person searches cease immediately. Additionally, youth must not be required to shower as part of the search process.

The OCA raised significant concerns with OT RTC's search policy and practice. The OCA was provided an updated policy which states, "All residents are required to pack a towel and leave all items in the search room and proceed to the dorm." All language in the updated policy remained the same as the original policy aside from instructing youth to proceed to the dorm rather than the shower. The dates on the updated policy reflect the same dates as the original policy.

The OCA recommends the removal of the requirement for youth to pack a towel. The OCA further recommends staff search youth's belongings with youth present and provide youth an opportunity to hand over any items that may be considered contraband prior to searching their belongings. Body searches should not be allowed by staff at any time. If there is any concern a youth is concealing dangerous items, the local police should be notified immediately.

The OCA notified DCYF and requested OT RTC to cease these "strip searches" immediately on April 8, 2025. To date, the OCA has received no finalized policy from OT RTC as to their current search process.

Ocean Tides response- OT does not conduct "strip searches." OT conducts clothed body searches with a metal detector wand. The cameras in the office where searches are conducted were installed at the recommendation of Child Protective Service investigators from DCYF for the protection of staff and youth. The cameras have been disconnected on the recommendation of OCA and DCYF. Showers are optional for youth when they return from pass. A series of meetings have been held with DCYF and RI Training School staff to find a solution that

addresses the OCA's concerns and maintains the safety of youth, staff, and community. OT has an excellent record of safety working with a population that the state otherwise requires to be kept in a secure locked facility with mechanical and physical restraints. OT takes the OCA's concerns very seriously and in collaboration with staff from RI Training School and DCYF modified its procedures based on the comments in the report. The revised Privacy & Search Policy included in the appendix.

The OCA unequivocally maintains this recommendation. To date, despite repeated requests to both Ocean Tides and DCYF, the OCA has not received a finalized search policy, which conforms with the Children's Bill of Rights and DCYF Licensing Regulations. The Ocean Tides' Privacy & Search Policy provided in the appendix of Ocean Tides' response is a draft policy.

Ocean Tides makes the assertion a DCYF Child Protective Service Investigator (CPI) recommended searches be done on camera for the protection of the staff and youth, however the CPS investigation indicates that Brian Sullivan outlined the plan to conduct searches on camera. Findings of a CPS investigation report from September 19, 2024, wherein a conversation with Brian Sullivan is documented by the CPI, states, "CPI met with Brian Sullivan who states that they have been talking about this issue recently as many of the residents are there on gun charges so they must try to prevent contraband from getting into the program. He also said that vape pens are a huge issue, and kids are creative about hiding things and talked of some wearing two pairs of boxers in an attempt to conceal things. He also said they have kids who refuse to hand things over to staff so going forward, they are going to be reporting it to their PO's and possibly revoking their TCP. He said they recently realized that the room they have been using doesn't have a camera but they are coming up with a solution so it is on camera and for the time being will just wand them down in the hall where there is a camera. He doesn't think staff are deliberately touching the kids, but it may occur by accident, he will remind staff to be more aware when doing so. He knows staff should never be touching a resident and understands that it could make a resident uncomfortable. He said that all staff are PREA trained."

DCYF was notified of the process to video tape searches of youth in their underwear. Not only was CPS notified through the course of this investigation, but the investigation also documents a notification to Licensing, specifically Lori D'Alessio and Darlene Chamberland. The OCA found no documentation of consent to this specific videotaping by parents, guardians or youth contained in files reviewed. Additionally, as previously documented by the OCA, it is the OCA's position that this type of search is in violation of the Children's Bill of Rights.

Ocean Tides makes the assertion that they work with "*a population that the state otherwise requires to be kept in a secure locked facility with mechanical and physical restraints.*" As previously reported on page three (3) of this response, the population of youth living at Ocean Tides is not a population exclusive to Ocean Tides and youth are not required to be involved in the juvenile justice system to reside or be accepted into Ocean Tides. While a majority of youth at Ocean Tides are juvenile justice involved, there is no requirement they be involved. To date, the OCA has not received a final updated Privacy and Search Policy from Ocean Tides and continues to receive information with inconsistencies about the search process and the requirements therein.

Additional Issues Identified: On April 10, 2025, the OCA was notified that following the meeting with DCYF, the OCA, and Ocean Tides to discuss the concerns regarding the search process, showers would no longer be a part of the search process, the expectation was that searches would no longer be filmed but two staff would be present, and blinds would be installed to the search room to ensure privacy during the search process from others who may be passing the room. On July 15, 2025, the OCA reported to Ocean Tides for an unannounced monitoring visit. OCA staff observed that security cameras were still connected in the room where searches were taking place. Additionally, the blinds had not been installed on the windows of the room utilized for searches. The OCA brought this to the attention of Ocean Tides Administration, as it had previously been reported that this had been completed. The OCA returned to Ocean Tides on July 22, 2025 for an unannounced visit. At this time, it was observed by OCA staff that the cameras had been disconnected, and the blinds were installed.

On October 3, 2025, the OCA received the written response from Ocean Tides to the OCA's initial report. Attached was a draft copy of the updated Privacy and Search Policy. On October 23, 2025, OCA staff went to Ocean Tides for an unannounced monitoring visit. Youth were interviewed regarding the search process at the program. Youth were interviewed individually. Some youth reported they were still being searched in only their boxers and are now required to do jumping jacks. Some youth reported they were removing their underwear, changing into shorts and a shirt provided by Ocean Tides prior to being searched and are required to do jumping jacks. Other youth report sometimes they are only wearing boxers and other times, they are told to get changed into Ocean Tides issued clothing rather than the youth's own clothing. It was unclear if all youth are using the same clothing rather than new clothing or they are provided with their own clothing. Several youth stated the way the search process is handled depended on the staff working that shift. It is important to note, the additional step of having youth do jumping jacks was not outlined as a part of the draft Privacy and Search Policy provided.
On October 24, 2025, the OCA followed up with DCYF and Ocean Tides regarding the ongoing discrepancies in the search process and the policy. The OCA has consistently requested that a policy be developed, which adheres to the Children's Bill of Rights and aligns with national best practice. The OCA was assured that a discussion would be coordinated to discuss this issue. As of the date of this correspondence, the OCA has not received a final policy or additional updates from either Ocean Tides or DCYF.

OCA Recommendation: The OCA recommends the search policy be in compliance with the DCYF Licensing Regulations. The OCA recommends using consistent and specific language within the policy and handbooks of when searches are permitted.

The OCA recommends staff thoroughly search residents' belongings when returning from off campus, searches are done in the youths' presence except in the case of an emergency or unauthorized absence, and a protocol clearly defines how to conduct a search of youths' belongings. Staff responsible for bag searches must focus solely on this search in order to be thorough.

The OCA further recommends that every youth's case record include a regularly updated inventory of personal belongings to be in compliance with DCYF Licensing Regulations.

Ocean Tides Administration must ensure strict adherence to policies and procedures by staff.

Ocean Tides response- Ocean Tides has met with the OCA and DCYF. OT has continued to work with DCYF staff on a solution that respects youth privacy and at the same time maintains the safety of the Ocean Tides community. The OT Privacy and Search Policy is the governing policy of the program and that language will be reproduced in staff, youth, parent handbooks and communications.

While youth are searched individually when they return from pass, they may return with a varying number of items. To search for these items in the presence of each youth is going to create a significant delay in intaking youth. It will also likely encourage a rushed process as opposed to the "thorough search" the OCA is recommending. To comply with this recommendation OT would have to limit the number of items a youth returns with to one bag. Additional items and bags would need to be searched outside the presence of the youth.

The OCA maintains this recommendation. These are clearly outlined in the DCYF Licensing Regulations. The applicable DCYF Licensing Regulations are:

Section VI. (I) Clothing and Personal Belongings, (3) "All clothing and personal belongings, including newly acquired items, will be included in an inventory list in the child's record."

Section VI. (K) (3) states, "[s]earches of a child's room or personal belongings may be conducted only when reasonable grounds exist to believe the search will yield evidence ah the child has violated the law or legitimate rules of the program."

Section VI. (K)(4), "[r]andom or routine searches are prohibited unless specifically outlines the child's individual service plan (refer to Section Three-Licensing Standards, V. Facility Records and Service Plans, A. Facility Case Records, 2 (j) to ensure the health and safety of the child.)

Section VI. (K)(5) states, "[t]he child will be present for the search of that child's room or belongings, except in the case of an emergency or unauthorized absence and direct care staff will maintain the privacy of the youth with respect to other residents."

OCA Recommendation: The OCA recommends a consistent policy, protocol and procedure for dispensing and passing medications. Staff must put all of their attention on safely completing this process. One staff must be assigned and responsible for medication pass. This staff should not engage in any other duties during the medication pass process. Re-training staff on handling medications properly in addition to keeping medications secure at all times is recommended. Additionally, the OCA recommends storing residents' hygiene and other personal products in a location that will not interfere with medication management. Controlled substances must be counted and accounted for each shift. Administration must ensure adherence to all policies and procedures by staff.

Ocean Tides response- OT agrees with OCA on this issue. Retraining is in progress. A storage device specifically built for medication storage has been acquired. Options on keeping hygiene and other personal products in separate locations are being reviewed but those items need to be secure as well. Controlled substances will be counted on each shift they are dispensed. OT is looking to expand its nursing staff to assist in handling of medication.

The OCA appreciates Ocean Tides' action with respect to this recommendation. The OCA will follow up with Ocean Tides as appropriate.

OCA Recommendation: The OCA recommends updating the Resident Handbook to include a complete Children's Bill of Rights. All information in the Resident Handbook must be consistent with policy and protocol.

Ocean Tides response- This administrative task has been completed.

The OCA appreciates Ocean Tides' action with respect to this recommendation.

OCA Recommendation: The OCA recommends when youth are in crisis, staff only utilize TCI techniques including de-escalation and approved holds and restraints, to ensure the safety and appropriate hands-on of youth. Administration must allow staff to use their TCI training to safely manage unsafe behavior, including the use of TCI restraints and holds.

The Seclusion and Restraint policy must include the post-crisis timeline and documentation protocols outlined by the TCI training. Documentation must be reviewed by Administration. In the event techniques that do not align with TCI are used to manage a crisis, administrative actions should include but are not limited to, documenting the discrepancies, disciplining staff, and re-training staff on proper techniques.

Ocean Tides response- OT has successfully managed the youth in its care without the use of restraints for 50 years. No youth has been harmed in a restraint, and no staff members were injured while performing a restraint. The use of the term "must" indicate that the OCA is stating that the program must discontinue its successful 50 year practice regarding restraints.

All direct care staff have current TCI training including in the use of physical restraints. As a member of the Lasallian Youth and Family Services (LAYFS), the Association of Children's Residential & Community Services (ACRC), the Rhode Island Coalition for Children & Families (RICCF), the goal is to reduce and eliminate the use of restraints in childcare settings. Since shifting to the TCI model OT has been communication with TCI who provide the Train the Trainer model to our staff, and they support our practice. All practices at Ocean Tides follow TCI training.

The OCA maintains significant concerns regarding the use of restraints and compliance with corresponding regulations and law. The OCA maintains this recommendation needs to be addressed.

Ocean Tides states above, "No youth has been harmed in a restraint, and no staff members were injured while performing a restraint." Ocean Tides also asserts, they do not perform restraints and have, "successfully managed the youth in its care without the use restraints for 50 years." This is contradictory as it notes the facility to be restraint free, while also purporting that no youth or staff have been injured during restraints.

As documented earlier in the report, the response from Ocean Tides incorrectly indicates that the OCA is recommending Ocean Tides to "...abandon the restraint free model that has worked for the last 50 years." This was not the recommendation of the OCA. Following a comprehensive review of IRs and video footage, the issues discovered present violations of both DCYF Licensing Regulations and R.I.G.L. The OCA documented these concerns earlier in the report, please refer to pages 2-3.

OCA Recommendation: The OCA recommends youth are not permitted or utilized to assist staff in breaking up fights for any reason. Youth should not be rewarded for assisting. Staff should be utilizing the appropriate TCI intervention.

Ocean Tides response- Youth are not expected or encouraged to assist staff in breaking up fights under any circumstances. However, youth sometimes display a natural human reaction to conflict. Youth will sometimes encourage their peers to calm down, and this can be effective when they are in crisis. We will also commend them for making positive choices by not instigating the situation further or feeling like they must "jump in" on their friend's side.

The OCA conducted multiple interviews with residents, former residents and staff. It was reported to the OCA that youth are rewarded by Ocean Tides staff and Administration for intervening in a fight. Providing a reward could promote the wrong message, specifically, that this behavior is in fact encouraged. Many youth reported being rewarded by Ocean Tides Administration when they have assisted in breaking up fights, including earning their weekend passes back. Some staff admit they will give youth extra privileges for assisting. This information was consistent throughout interviews with staff. Some youth and staff also reported youth assist in breaking up fights because staff are unable to successfully manage the situation and are struggling.

OCA Recommendation: All staff working directly with the youth must be fully trained in TCI within thirty (30) days of hire to align with Licensing Regulations and ensure the safety of staff and youth.

Ocean Tides response- We are reviewing this, and we can do every component of the TCI

training except the restraints with an individual. A group is required to complete the restraint portion of the training. We currently have a training scheduled every 90 days that includes the restraints. Ocean Tides on average hires 5 staff per year over the last 4 years.

The OCA maintains this recommendation. While the OCA understands the challenges presented by Ocean Tides, administration will need to find a solution to the requirement of a group for training to ensure compliance with the DCYF Licensing Regulations. Section (VI) (5)(a)(i) of the DCYF Licensing Regulations states, "[e]ach facility will require that staff, including relief staff, successfully complete the training prior to being solely responsible for any child or participating in any restraint. Staff will have the opportunity to complete such training within thirty (30) days of hire."

OCA Recommendation: The OCA recommends IRs include all pertinent information including but not limited to what follow-up occurred as a result of the incident and who was notified. All AWOLs must be properly documented and all follow-up after the incident should be noted.
A protocol must be developed regarding completing all logs and rosters. Staff must complete these forms fully and consistently. Staff must document how much sanction time a youth has worked off and whether they sat in a chair or did specific chores. Any shorthand used by staff should be explained on the document and used consistently amongst staff.

Administration must review and ensure documentation adheres to policies and procedures. Any language that does not reflect current practice and protocol should be removed and/or updated in all policies and handbooks.

The OCA recommends senior staff assign the role of Shift Manager at the beginning of each shift.

Ocean Tides response- Logs are being adjusted to accommodate this recommendation.

The OCA appreciates Ocean Tides' willingness to address this recommendation. The OCA will follow up as appropriate to review the changes made in compliance with this recommendation.

OCA Recommendation: The OCA recommends the Client Grievance Policy, and the handbooks are written using consistent language. By stating youth "shall" attempt indicates they must do this prior to filing the grievance. Youth have the right to file a grievance at any time and should have the option.

Ocean Tides response- "Shall" has been removed from the handbooks.

The OCA appreciates Ocean Tides addressing this recommendation. The OCA will follow up as appropriate.

OCA Recommendation: The OCA recommends that OT RTC only allow approved visitors into the facility. If someone who is not on the list attempts to visit they should be denied entry. Youth's DCYF worker along with any assigned CASA, GAL, and/or Probation Officer must be notified of

any unapproved visitors attempting to enter the facility. If a visitor brings in contraband, this information must be called into the hotline and the assigned DCYF/Probation/CASA worker must be notified. Police should also be notified when a visitor brings in illegal contraband.

Ocean Tides response- Over the past year Ocean Tides has modified procedures around on campus visits. These modifications include:

- *Limiting visitors to immediate family and those approved by DCYF/Probation (i.e. guardians, mentors, pass resources).*
- *Checking identification of adult visitors.*
- *Prohibiting behaviors by visitors and residents during on campus visits.*
- *Primarily utilizing the main dining room for on campus visits.*
- *Any breaches or attempted breaches will be reported to DCYF/Probation or CASA workers and all illegal activity reported to the Narragansett Police.*

An On Campus Visits Policy will be developed and submitted for approval to the OT Board of Trustees.

The OCA possesses audio recordings that indicate visitor identifications (IDs) are not routinely checked and social workers and/or Probation Officers are not notified. Family members may be allowed in for a visit although they are not on the approved visitation list. However, without checking ID's there is no verification of who is visiting or their relationship with the youth. For example, the OCA possesses an IR and an audio recording that indicates a teenage female was allowed to visit who was subsequently found in a bathroom stall with a resident. This teenage female was not on the approved visitor list and no ID was verified.

The OCA requests an update and copy of Ocean Tides' On Campus Visit Policy once approved by the Ocean Tides Board of Trustees.

OCA Recommendation: Any youth denied a reasonable expectation of privacy during phone calls must have supporting written documentation in their clinical treatment plan. This decision must be made and agreed upon by the youth's entire treatment team and reviewed every thirty (30) days as a team. The OCA further recommends a phone call schedule be available to youth and include flexibility outside of their clinical session. The language used in the Residential Counselor Handbook must match the Residential Telephone Policy.

Ocean Tides response- The OCA made specific requests for changes to the Ocean Tides Resident Telephone Policy outside of this report that have been made and submitted to DCYF and the OCA. Any conflicting language in handbooks and the revised policy has been addressed. The monitoring of resident phone calls by speaker phone was implemented in response to incidents of youth being connected to unapproved contacts by an approved contact using 3 way calling. This does not include calls to:

- *Attorneys*
- *Department of Children, Youth and Families (DCYF)*
- *Special Advocates (e.g., Day One 1 800 494-8100)*
- *Office of Child Advocate - (401) 462-4300*
- *Child Abuse Hotline 1800 RI CHILD*

OT can remove the procedure of monitoring calls to guardians, though that was a source of facilitating 3 way calling to unapproved contacts. OT strongly recommends leaving the current procedure in place for non- guardian approved contacts.

Youth can schedule a phone call with their clinician (or another clinician) outside their individual sessions after 3:30pm to avoid this being used as a reason to avoid class. Alternate arrangements can be made if the call needs to be made at a different or specific time.

The OCA acknowledges receipt of an updated draft policy from Ocean Tides. Upon review of the updated policy, the OCA maintains that the policy must align with our original recommendations to ensure compliance with DCYF Licensing Regulations. DCYF Licensing Regulations requirements are below:

Section VI. PROGRAM REQUIREMENTS

F. Visitation and Outside Contacts

2. The Facility will establish rules regarding telephone use. Residents should be allowed to communicate with family and significant others.
3. Reasonable privacy will be provided for visits and telephone conversations.

As a rule, phone calls should not be on speakerphone. Any youth that violates the rules of making phone calls to communicate with unapproved contacts or due to safety concerns identified by DCYF may then be required to have phone calls on speakerphone provided such information is documented and incorporated into the child's clinical treatment plan. This should not be routine practice.

In addition, the Children's Bill of Rights states, "…In addition any special restriction on the use or receipt of mail or telephone calls shall be noted in writing; signed by the head of the facility or the facility head's designee; and made a part of the child's permanent clinical record." The policy should be update to reflect compliance with both the DCYF Licensing Regulations and R.I.G.L.

OCA Recommendation: The OCA recommends training staff to recognize symptoms of drug and alcohol use. OT RTC must create a policy and a protocol to identify steps taken by staff when youth appear under the influence. Youth must be medically cleared by a professional including but not limited to, nursing, EMS or a hospital when suspected of being under the influence. Documentation must include all follow up actions taken.

The OCA recommends OT RTC implement a comprehensive and in-depth substance use curriculum to better and adequately equip youth with knowledge and coping strategies to make healthier choices. Additionally, the OCA recommends specific substance use counseling and clinical work be fulfilled; including but not limited to the curriculum used by OT RTC be addressed and reflected in youth's clinical treatment.

Ocean Tides response- OT staff are trained to recognize the signs and symptoms of drug and

alcohol use. OT Nurse is included on all IR's involving program youth and can clear program youth when available. Medically clearing youth under the influence of THC is a barrier beyond program nursing staff who are only available when on shift and is not an appropriate use of EMS. OT can attempt to transport all youth to the ER for medical clearance but that can only occur with the client's consent as they can refuse to get in the vehicle for transport or refuse to be seen at the ER. It is also not considered medically necessary for THC influence and there is not medical treatment.

The OCA maintains our recommendation that Ocean Tides is to create a policy and protocol for all steps taken by staff when a youth appears under the influence of a substance. The OCA possesses audio recording of Ocean Tides Administration stating some people are terrible at identifying when youth are under the influence and joking that some staff label a youth high when they are just tired or bored. Furthermore, Ocean Tides Administration advised they tell staff to write "appeared" and document what they see. There is no evidence of a policy, protocol, or procedure for next steps or follow through documented on any incident reports reviewed by the OCA, regarding youth who were potentially under the influence.

The OCA does not disagree this could be a poor use of emergency rooms and EMS services, however the option of on-call nursing to assess a youth may be appropriate and useful especially since there is no policy. When caring for someone else's child there is a heightened responsibility to ensure the child is safe and provide adequate supervision and care when under the influence of unknown substances. Most concerning is many of the IRs reviewed had no follow up information with respect to steps taken when the suspicion of being under the influence arises.

Many of the IRs were mid-week and one incident report documents, "…Bill and I believed that [redacted] was somehow impaired by what we did not know. He was observed slurring his speech, his eyes glossed over, and he squinted at the lights in class…" This incident was reported on a Tuesday morning at 9:45AM, which means that youth are likely gaining access to these substances while in the program. Corresponding incident reports do not contain any information to illustrate that a youth was appropriately or adequately assessed for substance use.

Additional Issues Identified:

Following the release of the initial report, the OCA continued to receive calls regarding access to contraband by youth in the program. On November 11, 2025, the OCA received information about concerns that a youth at Ocean Tides was high during an on-grounds visit. Upon review of this information the OCA met with Ocean Tides Administrator, Brian Sullivan, to obtain records and documentation about the youth. In response to our request, the OCA received Social Service Progress notes, toxicology screens, incident reports, trip and activity logs, and visitor and pick up logs. Mr. Sullivan inquired as to where the OCA received this information, as the youth's mother had contacted Ocean Tides after departing from a visit with her son because she felt her son was high, but never notified staff of her concerns during the visit. The OCA inquired about the steps taken by Ocean Tides after receiving the call from mother. The

Ocean Tides Administrator indicated he was unsure of the exact steps taken but assumed staff probably checked in with the youth directly. The OCA reviewed an IR from November 11, 2025 wherein the report states, "[Youth] had a family visit. [Staff] oversaw the family visit. The visit was brief and seemed to not be a positive visit. Afterwards, mom called and indicated she believed he was high. Resident did not appear high nor was he acting strangely. He appeared clear-eyed. Mom expressed concern. I let her know I would pass it along to his social worker." Report was signed by a staff member. However, the IR was not completed in full, with pertinent information missing on the form.

New Issue Identified:

On December 16, 2025, following the OCA's inquiry about the above incident, DCYF forwarded the OCA a form submitted by Ocean Tides labeled Under the Influence Check list. Despite requesting all documentation regarding the above incident on November 11, 2025 from Ocean Tides Administration, the OCA did not receive this document, nor was the OCA made aware this document existed. The form was completed for the above youth and the concerns of substance use on November 11, 2025 during an on-grounds visit were documented.

This form is for suspected substance use and for vital signs to be taken and report to nurse if positive for symptoms. The top portion of the document is to document a youth's blood pressure, pulse, respirations and oxygen saturation. There is also a heading for marijuana with multiple boxes and corresponding symptoms to be checked off. The next heading is for hallucinogens, with corresponding symptoms and boxes to be checked off. The next heading is for opiates with corresponding symptoms and boxes to be checked off. The final heading is for barbiturates, benzodiazepines and hypnotics, with corresponding symptoms and boxes to be checked off. The bottom of the page is for staff signature.

The OCA immediately followed up with Ocean Tides Administrator, Brian Sullivan, to obtain information regarding the form and when this form became a part of Ocean Tides procedures. According to Mr. Sullivan the form was implemented in October as a pilot between nursing and supervisory staff in the school and residential. The training will be incorporated into the CPR/First Aid/Medication training conducted with all staff. As of December 22, 2025 the OCA was informed this was being handled by shift supervisors in communication with nursing. All staff training will be scheduled to roll out over the next year. Ocean Tides did not have an accompanying policy or procedure to guide the implementation of this form.

On January 12, 2026 after several follow up requests to Ocean Tides by the OCA, the OCA was informed by Mr. Sullivan, "I spoke with Denise Gilbert RN, she said she met with staff on 11/5/2025 to discuss the checklist and procedures involved. She is prepared to implement this as a formal training that will be stand alone. She will document that training and we can forward that to the OCA as it is completed (a short list of those who

have completed already is attached. We will also develop a Policy and Procedure that will support the practice."

The accompanying documentation of completed staff training was three (3) staff with training dates of January 7, 2026, January 12, 2026 and January 12, 2026. However, it was originally reported to the OCA that supervisory staff had already been trained. Additionally, the staff initials on the form submitted for the youth on November 11, 2025 was not one of the trained supervisors documented by Ocean Tides. To date the OCA has not received a policy or procedure to accompany the use of this form and substance use screening tool.

OCA Request: The OCA would request that this policy be provided to the OCA upon completion.

New Issue Identified:

On November 21, 2025, a youth from Ocean Tides contacted the OCA with concerns about his treatment by a staff member at Ocean Tides. The youth requested information about filing grievances against staff. The OCA advised the youth of his rights and offered assistance in reaching out to Ocean Tides Administration on his behalf to ensure the grievance process was followed accordingly. A few hours later, on the same date, a CPS Investigation was initiated regarding the same youth where he ingested what was believed to be suboxone three (3) days prior, on November 18, 2025. The OCA responded to Ocean Tides on November 24, 2025 to follow up on the information reported by the youth and CPS.

OCA staff met with Ocean Tides Administrator, Brian Sullivan. When addressing the incident involving the youth's ingestion of a substance, the OCA questioned why the matter was not immediately reported to the Hotline. Mr. Sullivan reported he did not know, but that the nurse had reported to him that she had trouble using the text-to-speech telephone system, as she is hard of hearing, and was confused by the Hotline menu options and did not know which option to choose. Mr. Sullivan reported the nurse, Denise, had attempted to call on Tuesday, and Denise followed up with Susan Vogel that evening. Mr. Sullivan reported a DCYF investigator came out on Friday, November 21, 2025 and met with the nurse. Mr. Sullivan had confirmed that the youth was not feeling well during school hours on Tuesday, though he unsure of the exact time. He noted that two youths had been vomiting that week. The OCA reviewed nursing notes for the two youth.

Mr. Sullivan reported that he did not know where the youth obtained the substance and confirmed that no youth at Ocean Tides is prescribed Suboxone. He reported that nurse found the Suboxone wrapper, describing it as a green and yellow packet similar in appearance to a ketchup packet, and it contains a flat film inside. When asked about the youth's use of the computer in the nurse's office, Mr. Sullivan explained that youth are permitted to use it with the nurse in order to research health symptoms. He also reported

that, to his knowledge, the youth in question had not participated in any off-grounds visits or overnights.

When the OCA inquired further about the youth being sick, Mr. Sullivan was unable to answer several questions regarding the vomiting incident, including where the youth threw up, whether it occurred in the bathroom, who witnessed it, and whether the youth's probation officer or DCYF personnel had visited him during the week. He could only recall that Child Protective Services had come to the program on Friday, November 21, 2025, to meet with the youth.

When the OCA inquired about the follow-up actions taken by Ocean Tides Administration, Mr. Sullivan reported that he spoke with Denise, Susan, and supervisory staff to ensure everyone remained alert for the presence of this substance/package. He explained that Denise accepted responsibility for not calling in the incident earlier, and he described her as very professional. According to Mr. Sullivan, Denise expressed discomfort about reporting the matter because she was concerned about patient confidentiality. Mr. Sullivan stated that he was not aware until Friday that the Hotline call had not been made. When he learned this, he instructed Denise to make the call.

The OCA interviewed with Denise Gilbert (Nurse) regarding a DCYF Hotline report made on November 21, 2025 concerning the youth who was suspected of being under the influence on November 18, 2025. At the start of the interview, OCA staff introduced themselves, clarified their role, and explained that they would be asking Denise to describe the events surrounding the incident.

The Nurse explained that on November 18, 2025 she arrived at work in the morning and greeted the principal, who informed her that one of the boys was feeling nauseous. She went downstairs and another staff member reported that the youth had vomited after breakfast and continued to complain of stomach pain. At approximately 10:00 a.m., the Nurse assessed him, noting that his vital signs were stable. He appeared tired, and she provided him with Pepto-Bismol before sending him back to his room to rest before getting back up for lunch.

During lunchtime, the Nurse went to the cafeteria and noted that the youth was not present. She returned to his room to check on him, and he reported that he still did not feel well, and that the nausea had not improved. The Nurse encouraged him to stay hydrated and stated that the regular lunch meal, hamburgers and French fries, was unsuitable for a nauseated stomach. She instead offered him cake without frosting and milk. After eating, he stayed awake and felt a little better.

Later in the afternoon, at approximately 3:00 to 3:30 p.m., the youth came into the office because he still felt weak. She took his vital signs, which remained stable. As part of her routine when a youth reports stomach discomfort, she asked whether he had taken anything. The youth denied taking anything at that point. He then asked to research something on the computer, which the Nurse allowed. While they were at the computer, the Nurse noticed that he was holding a yellow/green package. They looked it up together

online, and during this process he admitted to ingesting the substance, which was identified as buprenorphine/Suboxone. When the information appeared on the screen and they read it together, the youth "freaked out". She then checked his vitals again and confirmed that they remained stable. She added that because he does not have an opioid dependency, the effects of the medication on him may have differed from its intended use.

Immediately afterward, the Nurse briefly assisted another youth who was experiencing a dental issue. She then reported the incident to Mr. Sullivan, providing him with the same information she shared during the interview. Mr. Sullivan instructed her to complete an incident report and call it in to the Hotline. The Nurse stated that she contacted Susan that Tuesday evening for guidance due to the menu options, and Susan directed her to press option #1 abuse and to call the Hotline the following day.

When asked whether she called the Hotline as instructed, the Nurse admitted that she did not. She explained that she was sick the next day and forgot to make the call, adding that she has worked in the field for many years and had never previously needed to contact the Hotline. The Nurse stated on Friday November 21st, Mr. Sullivan asked her if she called the Hotline and reported the incident. She told Mr. Sullivan she forgot to call, and he instructed her to call it in because this is a safety issue. She also noted that the youth had no prior medical concerns or illness episodes during his time at Ocean Tides.

The Nurse clarified that to her knowledge, no youth at Ocean Tides are prescribed Suboxone, and she does not manage or dispense medications. She attempted to contact a local pharmacy to identify the prescription source based on the package lot number, though she was aware that the pharmacy would not be able to disclose patient information.

Regarding the youth's symptoms, she described him as looking very sick, reporting feelings of tiredness, weakness, and nausea. She did not originally suspect that he was under the influence, and she did not ask him when he took the substance. He told her that he had never taken opioids before and that someone had given the substance to him. The Nurse reported that following the incident, staff were instructed to be alert for the yellow/green package associated with the substance. The Nurse expressed concern about the situation, explaining that her role is to care for the youth and that she felt badly that the youth received a consequence of losing weekend privileges. She also expressed worry that reporting incidents of this type to the Hotline, conflict with client–patient confidentiality.

New Issue Identified:

On January 28, 2026 the OCA along with the Federal Monitor, Elizabeth Manley, conducted a drop-in to Ocean Tides. The OCA requested to speak with the Nurse regarding the Under the Influence Check List and monitoring youth's vital signs, specifically taking youth's blood pressure. Ocean Tides Administrator, Mr. Sullivan was unable to locate the Nurse, but explained the staff follow instructions on a sheet and

record the blood pressure provided by the machine. Mr. Sullivan also reported Ocean Tides recently began swab testing on residents once per month to test for drug use, to supplement the urine screens. Mr. Sullivan informed the OCA this process was implemented three (3) months ago for youth that have trouble providing urine samples or for youth that attempt to tamper with their urine samples. Mr. Sullivan reported he was performing the swab testing and now the clinical department is responsible for conducting the swab testing. The OCA asked Mr. Sullivan if DCYF had been informed of this new process and he advised DCYF had not been out to the program. The OCA asked Mr. Sullivan if DCYF had been to the Ocean Tides in November for re-licensing and he then noted, DCYF is out here often. The OCA again inquired whether DCYF had been advised of this change in the screening process and Mr. Sullivan indicated he didn't know. Mr. Sullivan finally reported to the OCA he did not tell DCYF about implementing the swab process as he did not feel the need to inform DCYF of this change. Through this report, DCYF will be on notice regarding this practice, if they have not been notified already.

OCA Request: The OCA would request that DCYF review this process to ensure compliance with all relevant regulations and law. Additionally, a corresponding policy regarding the parameters of this practice should be developed and reviewed by DCYF. This issue was also referenced on page four (4).

OCA Recommendation: Inappropriate behavior and/or unwanted touching amongst youth must not be tolerated. All PREA violations must be appropriately reported immediately following a qualifying incident. Youth must be properly supervised to deter them from engaging in inappropriate behavior staff must quickly intervene if it happens. Youth must be given a clear expectation of acceptable behavior and appropriate consequences for the offending youth must be utilized. Support must be given to any youth who experiences inappropriate and/or unwanted contact with another youth and their clinician notified.

Many of the youth at OT RTC have significant trauma histories. While Administration has normalized this behavior, it is not appropriate for youth to be touching others in a residential treatment facility. Allowing and minimizing the inappropriate behaviors places youth in situations to be triggered and re-victimized.

Ocean Tides response- Ocean Tides is a Prison Rape Elimination Act (PREA) certified facility and has been certified as following the standards established by this process for almost a decade. This process emphasizes the "detection, prevention, reduction, and punishment" of sexual harassment, sexual assault, and voyeurism. This includes classifying incidents into specific categories "Youth on Youth" or "Staff on Youth", then whether the incident is a sexual harassment, sexual assault, or voyeurism. Each classification has specific responses and reporting requirements. Ocean Tides completed all appropriate actions and reporting. The perpetrating youth was given appropriate consequences, provided a reorientation to PREA rules. The victimized youth was followed up with as long as he remained in placement. The most recent completed PREA survey of Ocean Tides has been provided. To be clear: there is absolutely no normalizing of sexual harassment, abuse or voyeurism and any characterization otherwise is lazy and wrong.

The OCA firmly upholds the above recommendation. Any unwanted touching or sexualized behaviors/words towards another youth, even if joking is inappropriate, especially in this setting. There should be no minimization or tolerance of these behaviors at any time. Any of the above actions by youth and/or staff may be triggering for youth with trauma histories.

As documented in the initial OCA site review, the OCA provided information directly reported to and documented by a CPI on May 20, 2025. The OCA placed direct quotations from an investigation wherein youth and staff were interviewed by the CPI.

As previously reported by the OCA the youth involved directly in the investigation admitted to rubbing his penis against the other youth, but "did it as a joke." Youth further stated, "Everyone does that. They rub against each other, slap each other on the butt and talk dirty all the time." The CPS report indicates that Mr. Sullivan's response to the allegation was, "It is not uncommon for residents to rub against each other or slap each other's buttocks in an attempt to make other residents laugh. Mr. Sullivan reported staff address the incidents as they arise, however the residents continue to engage in that sort of behavior." The CPS report notes that Mr. Sullivan further stated the victim youth "doesn't fit in with many of the other residents" and told the DCYF Investigator, "similar incidents have occurred between [redacted] and his peers. [redacted] only reported the incident involving [redacted]."

During this investigation, it was also reported to the CPI by a senior staff who described the incident as, "[redacted] was at the water fountain when [redacted] came up from behind and humped [redacted] briefly…" Staff further described the incident as "not intentional sexual harassment" and said the residents often "horse around with each other."

Additionally, on June 27, 2025, a Licensing worker spoke with Brian Sullivan regarding the above CPS Investigation. The note entered by the Licensing worker indicates Mr. Sullivan stated, "after reviewing the incident on camera it appeared to be an accident." Licensing also documented that Mr. Sullivan reported, "this was an isolated event and nothing something that was occurring with same youth multiple times."

The OCA and assigned CPI reviewed video footage and observed the one youth press his penis against another youth. Additionally, senior staff provided the OCA with a report of the incident. The report noted, "[redacted] was at the water fountain when [redacted] came up from behind and humped [redacted] briefly." And the offending youth involved, admitted to this behavior and did it "as a joke".

As noted by Licensing, Ocean Tides Administration characterized this incident as "an accident", which does not align with the reports reviewed, the facts presented by the victim, the facts presented by the offender, and the video footage of the incident. Additionally, as noted above, the CPS reports that this was a pattern of behavior involving this youth. The report notes, "similar incidents have occurred between [redacted] and his peers. [redacted] only reported the incident involving [redacted]." However, one month later, it is noted by Licensing that Ocean Tides Administration notes, "this was an isolated event and nothing something that was occurring with same youth multiple times." The information reported and documented is inconsistent.

Noting that this action was characterized as "an accident", "not intentional sexual harassment", "horse around with each other" does not seem to adequately reflect the seriousness of what occurred. It was also reported that "similar incidents have occurred" however this does not provide a clear picture of steps taken by Ocean Tides Administration to address and ameliorate such serious behaviors from occurring within the program.

OCA Request: If a pattern of behavior was identified, please advise on what steps were taken to address this.

Additionally, the OCA felt that it was important to address the concerns raised on pages thirteen (13) and fourteen (14) of Ocean Tides' response about this incident and what was referred to as the OCA's characterizations of Mr. Sullivan's actions. As outlined in the OCA site review report and again in this response, the information provided about the incident that occurred on May 2, 2025, is not assessment or characterization by the OCA of Mr. Sullivan's actions and responses. The information provided are direct quotes from DCYF documentation including a CPS report and Licensing note. Should there be any concern with how those documents reflect the statements of Mr. Sullivan, they should be addressed directly with DCYF.

OCA Recommendation: The OCA recommends that OT RTC works with DCYF to ensure youth are receiving dental services in a timely manner upon admission and throughout their time in the program.

Ocean Tides response- OT have been able to maintain dental services for youth through continuing care with their current dentist and other resources around the state. A key challenge we face is that dentist offices in the South County area that traditionally provided services to Ocean Tides youth no longer accept the "Rite Smiles" insurance coverage that state of RI provides youth in care.

The OCA appreciates Ocean Tides addressing this recommendation. The OCA will follow up if any additional information is required.

OCA Recommendation: When a youth is expressing SI or there are concerns related to a youth's immediate mental health needs, the youth must be assessed by a mental health professional as soon as possible. Staff must take all statements made by youth seriously. Staff must consistently follow protocol to include having the youth assessed by a qualified individual and notifying all appropriate people.

Ocean Tides Response
Attached are both our Safety and Suicide Prevention Policy and our Bullying Prevention Policy.

Youth who express feelings or thoughts of self-harm are immediately referred to their assigned clinician and an alternate clinician will provide support if they are not available. A member of the Nursing staff may also be consulted. The youth is assessed and is asked to agree to a contract for safety and safety plan is established. If clinical and nursing staff are not available in person

or if after a clinical staff's assessment they feel the youth needs a more comprehensive assessment youth is transported by program staff or EMS to an Emergency Room for evaluation.

Staff intervene whenever one youth is bullying another and consequences are given to any youth who bullies another. The program and staff also take retaliation very seriously and follow up with who are victims of bullying through their clinician and through administration.

The OCA maintains this recommendation. Ocean Tides Administration and staff must always follow their policies and protocols. As documented in the OCA site review, numerous incident reports and police reports gave conflicting information about a youth's mental health status. More details regarding this issue are provided in the OCA's initial report. Incident reports did not appropriately, adequately or thoroughly document all steps taken when a youth expresses suicidal ideation or self-harm.

The OCA's Ongoing Monitoring of Ocean Tides

Since receiving this response, the OCA has been out to Ocean Tides for additional monitoring visits on July 15, 2025, July 22, 2025, October 23, 2025, November 24, 2025, December 15, 2025, and January 28, 2026. Some of the incidents reviewed illustrate that the issues cited in our initial site review, persist. While the OCA has continued to monitor and advocate for compliance with the changes recommended in our initial report, new issues have also been identified as outlined through this correspondence. In between monitoring visits, the OCA has followed up with Ocean Tides via email regarding some of the concerns outlined. Throughout our visits and as documented above, the OCA continues to see issues with the thorough completion of IRs, issues with sanctions, concerns regarding the search process, and the supervision of youth. The OCA also noted concerns with the use of contraband within the program, a consistent process for identifying and treating youth who are suspected to be under the influence, concerns regarding the clinical treatment being provided and documented, having an approach that is therapeutic and not punitive, and issues with the cleanliness of the program. Throughout these reviews, the OCA has also identified new practices had been put in place, such as swabbing youth to test for drugs and a new tool to identify whether youth are under the influence. These changes in practice were made without necessary training or the development of policies to ensure consistency. A theme has emerged with respect to these issues and will remain if they are not addressed.

The OCA maintains that all outstanding recommendations be complied with. The sole focus of the OCA and this report is to ensure the safety and well-being of children and youth experiencing our child welfare, children's behavioral health and juvenile justice systems. The findings and recommendations were made with the sole purpose of improving the systems serving our children and youth so that they may receive the quality care they deserve and that they are treated with dignity and respect. The OCA also seeks to promote policies and practices that fully support youth in successfully moving to the least restrictive setting. As the oversight agency, the OCA also seeks to ensure compliance with governing regulations, federal and state law. We remain ready and willing to discuss the OCA's findings and recommendations with Ocean Tides Administration, the Ocean Tides Board of Trustees and DCYF.

Lastly, the OCA must address the unprofessional and disrespectful conduct directed toward OCA staff and the Federal Monitor during our January 28, 2026 visit. In the presence of Ocean Tides Administration, the Residential Coordinator was abrasive and unprofessional toward our staff and the Federal Monitor, and this behavior was neither addressed nor redirected. At times, OCA staff also encountered pushback and unprofessional conduct from the Ocean Tides Administrator. While we understand that unannounced reviews and visits can present as high-stress situations, at no time should our staff, while fulfilling our statutorily mandated duties, be treated in such a hostile manner. Our sole purpose is to ensure the safety and well-being of the children placed at the facility. The conduct displayed raises serious concerns about professional judgment and interactions within the program, if this is their behavior towards adults operating in a professional capacity.

Please let this serve as the OCA's final response. It is the hope of this agency that both Ocean Tides and DCYF will address the concerns raised to ensure that our youth are receiving the best possible treatment.

Respectfully submitted by,

Katelyn E. Medeiros, Esq.
Child Advocate

Kathryn R. Cortes
Special Projects Coordinator

cc: Ashley Deckert, MSW, DCYF Director
Brandi DiDino, MSW, Deputy Director
Lori D'Alessio, Assistant Director for Administrative Services
Jason Lyon, Residential Monitoring, Chief of Strategic Planning
Chris Strnad, Associate Director for Community Services & Behavioral Health
Nina Lennon, Associate Director Financial Management
Deborah Palumbo, Esq., Administrative & Legal Support Services Administrator

APPENDIX A

Cortes, Kathryn (OCA)

From:	Anslo, Kristin (OCA)
Sent:	Thursday, January 23, 2025 3:28 PM
To:	Brian F. X. Sullivan
Cc:	OCA.OpenCases
Subject:	Re: OCA Site Visit - Ocean Tides

Hi Brian,

Thank you for confirming your availability. We would appreciate you forwarding the below documentation for our review prior to our visit.

Kristin

From: Brian F. X. Sullivan <bsullivan@oceantides.org>
Sent: Wednesday, January 22, 2025 10:10 AM
To: Anslo, Kristin (OCA) <Kristin.Anslo@doa.ri.gov>
Cc: OCA.OpenCases <OCA.OpenCases@doa.ri.gov>
Subject: Re: OCA Site Visit - Ocean Tides

This Message Is From an External Sender
This message came from outside your organization.

Report Suspicious

Hello Kristin

Yes we can be available on February 12th at 9:30am. Look forward to seeing you then.

Brian

Brian F. X. Sullivan
Ocean Tides Inc
President/CEO
401-789-1016 x222 | 401-788-0924 | 401-743-8047
635 Ocean Rd, Narragansett, RI 02882
www.oceantides.org [oceantides.org]

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From: Anslo, Kristin (OCA) <Kristin.Anslo@doa.ri.gov>
Sent: Thursday, January 16, 2025 3:28 PM
To: Brian F. X. Sullivan <bsullivan@oceantides.org>
Cc: OCA.OpenCases <OCA.OpenCases@doa.ri.gov>
Subject: OCA Site Visit - Ocean Tides

Good afternoon,

The State of Rhode Island Office of the Child Advocate (OCA) is reaching out to conduct a site visit for Ocean Tides.

Pursuant to Rhode Island General Law § 42-73-7(4), the Office of the Child Advocate (OCA) is required to review all residential facilities for children placed in out-of-home care. The OCA visits all facilities that are contracted with the Rhode Island Department of Children, Youth, and Families (DCYF) to observe the facility's physical condition, review operations and resident care practices, as well as to evaluate overall compliance with relevant regulations and policies. The OCA will review all documentation for residents, meet with all residents, and speak with staff regarding their role within the program. The OCA's primary objective is to ensure the safety and well-being of youth and young adults involved with DCYF.

In conducting this site review, the OCA is requesting the files maintained for all residents be available for review on-site, including medical, psychiatric, clinical, and residential. Additionally, the OCA is requesting to review staff communication, incident reports, grievances made by residents, and any other documentation kept in the regular course of programming. The OCA requests that an administrator and/or director who can answer questions regarding the mission of the agency and its day-to-day operations be available. The OCA may also communicate with other professionals and/or family members of children who have been placed in this out-of-home care provided by your agency.

The OCA is requesting the following information be forwarded to the OCA in advance of the site review. If digital versions are not available, the OCA requests hard copies be made available at the time of the visit to retain for our records. Please indicate if any of the below documentation is not applicable or available by your program.

Program Materials

- Youth Handbook/Rules
- Employee Handbook
- Staff Training Requirements
- Program Expectations
- Evidence Based Practice Models Utilized, including clinical and behavior management techniques
- Documentation/Explanation of Programming

Policies and Procedures

- AWOL Protocol
- Resident and Room Searches
- Restraint and Crisis Intervention; including all methods utilized ie; physical, mechanical, medical and/or chemical restraints
- Time/Out Seclusion Room
- Medication Administration and Storage
- Self-Harm/Self-Injurious Behaviors
- Resident Grievance

- Emergency Preparedness Plan

Data

- Average length of stay
- Total number of AWOLs for 2024
- Total number of restraints for each youth
- Total number of incidents\s and corresponding reports for each youth

The OCA will be planning to visit Ocean Tides on **Wednesday, February 12th at 9:30am**. Please confirm receipt of this email and that the date and time works for you.

Please feel free to reach out with any questions or concerns.

Thank you,

Kristin Anslo
Senior Planning & Program Development Specialist

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