

April 4, 2023

John Gross, Supervisor
Anoka County Juvenile Center
7545 Fourth Avenue
Lino Lakes, MN 55104

RE: Certification of the Anoka County Juvenile Center Sex Specific Program under Minnesota Rules, Chapter 2955

Dear Mr. Gross:

The Anoka County Sex Specific Program in Anoka County Secure Juvenile biennial inspection occurred between the dates of January 16, 2023 and February 28, 2023, utilizing Minnesota Rules, Chapter 2955, governing juvenile sex offender treatment.

This scheduled inspection visit consisted of the review of Sex Specific Program at Anoka County Secure Juvenile Center.

Based on the findings of this review, the Sex Specific Program at Anoka County Secure Facility for juveniles (K Pod Living Unit) is certified to operate for the term of March 1, 2023 until February 28, 2025 under the conditions and requirements presented in this report.

The inspection included discussions with multiple staff, supervisors, and administration, residents, as well as of staff interactions with residents.

Documentation review included staff personnel and training files, resident files, daily logs, treatment plans, discharge summaries, living unit and treatment schedules, and other pertinent facility documentation. There was also a review of the facility policy and procedure manual, resident handbook, and overview of the program.

Rules Out of Compliance

1. Rule Requirement:

2955.0080 STAFFING REQUIREMENTS. Subp. 9 Staff orientation, development, and training. The program must have a written staff orientation, development, and training plan for each sex offender treatment staff person. The program shall require that each sex offender treatment staff person complete the amount of coursework or training specified in this part. The education must augment job-related knowledge, understanding, and skills to update or enhance the treatment staff's ability to deliver clinical services for the treatment of sexually offending behavior and be documented in the staff person's orientation, development, and training plan. A. A staff member who works an average of half time or more in a year must complete at least 40 hours per biennium of coursework or training. B. A staff member who works an average of less than half time in a year shall complete at least 26 hours per biennium of coursework or training.

Inspection Findings: The Sex Offender Program does not have written staff orientation or a training plan. A review of employee training files revealed that training documentation was inadequate and disorganized. Training was documented in multiple places and not always in the employees training file. It was impossible to verify that employee training hours had been met as required in this rule part.

Corrective Actions: Create a written orientation program for new employees and develop a written biennial training plan that meets the requirements of this rule part.

Ensure that the sex offender program staff complete the required training and that the training is documented appropriately. Submit documentation showing corrective actions.

Must Respond By: May 28, 2023

2. Rule Requirement:

2955.0090 STAFF QUALIFICATIONS AND DOCUMENTATION. Subp. 2 Qualifications for administrative director. In addition to the requirements in subpart 1, an administrative director must meet the criteria in items A to C. A. An administrative director must hold a postgraduate degree in the behavioral sciences or a field relevant to administering a sex offender program from an accredited college or university, with at least two years of work experience providing services in a correctional or human services program. Alternately, an administrative director must have a bachelor's degree in the behavioral sciences or field relevant to administering a sex offender program from an accredited college or university, with a minimum of four years of work experience in providing services in a correctional or human services program. B. An administrative director must have 2,000 hours of experience in the administration or supervision of a correctional or human services program. C. An administrative director must have 40 hours of training in topics relating to the management and treatment of sex offenders and human sexuality.

Inspection Findings: The Administrative Director has not completed the 40 hours of training required per this rule part.

Corrective Actions: Submit a plan outlining the process by which the Administrative Director will complete the 40 hours of required training per this rule part. This training should be completed by August 8, 2023.

Must Respond By: May 28, 2023

3. Rule Requirement:

2955.0100 STANDARDS FOR SEX OFFENDER ADMISSION AND ASSESSMENT Subp. 1 Admission procedure and new client intake assessment required. A written admission procedure must be established that includes the determination of the appropriateness of the client by reviewing the client's condition and need for treatment, the treatment services offered by the program, and other available resources. This procedure must be coordinated with the external, nonclinical conditions required by the legal, correctional, and administrative systems within which the program operates.

An intake assessment process must also be established that determines the client's functioning and treatment needs. All clients admitted to a residential juvenile sex offender treatment program must have a written intake assessment completed within the first 30 days of admission to the program.

Inspection Findings: A review of client files revealed that in one case the required intake assessment was completed outside the 30-day requirement without an explanation provided.

Corrective Actions: Develop a process to ensure that intake assessments are complete within 30 days per this rule part. If the assessment is completed outside this timeline, document the reason.

Must Respond By: May 28, 2023

4. **Rule Requirement:**

2955.0130 STANDARDS FOR DISCHARGE SUMMARIES. Subp. 2 Written summary completed within 14 days. A written discharge summary for each client discharged from the program must be completed within 14 days of the client's discharge from the program, or upon request by an interested party.

Inspection Findings: The sample of client files reviewed revealed instances of written summaries completed after the allotted time frame of 14 days per this rule part.

Corrective Actions: Develop a process to ensure that written summaries are complete within the 14-day allotted timeframe. Document reasons if this timeline can not be met.

Must Respond By: May 28, 2023

5. **Rule Requirement:**

2955.0150 STANDARDS FOR DELIVERY OF SEX OFFENDER TREATMENT SERVICES. Subp. 6 Duty to monitor services provided by providers under contract to certificate holder. The certificate holder must monitor the amount, type, quality, and effectiveness of any service provided to a client by a provider under contract to a certificate holder to provide services to a client. If the certificate holder has reason to believe the services provided to a client by a provider under contract to a certificate holder are not provided according to the client's individual treatment plan, are not effective, or are not in compliance with this chapter, the certificate holder must inform the contractor and take action to correct the situation. If no satisfactory resolution can be achieved, the certificate holder must contract with an alternate provider as soon as possible.

Inspection Findings: Multiple contracted professionals are working with residents in the program, including a licensed psychologist, therapist, and polygraph specialist. Aside from visual observation, no process is in place to monitor or oversee programming completed between residents and these professionals.

Corrective Actions: Develop a process of periodic evaluations to ensure quality control of service provided by contractors to clients which adheres to this rule part. Submit process documentation.

Must Respond By: May 28, 2023

Rules Compliances with Concerns:

1. Rule Requirement:

2955.0090 STAFF QUALIFICATIONS AND DOCUMENTATION. Subp. 5 Qualifications for sex offender counselor. In addition to the requirements in subpart 1, a sex offender counselor must meet the criteria in items A to C. A. A sex offender counselor must hold a postgraduate degree or bachelor's degree in one of the behavioral sciences or related fields from an accredited college or university. B. A sex offender counselor holding a bachelor's degree must have experience and proficiency in one of the following areas: (1) 1,000 hours of experience in the provision of direct counseling or case management services to clients in one of the following settings: corrections, chemical dependency, mental health, developmental disabilities, social work, or victim services; (2) 500 hours of experience in the provision of direct counseling or case management services to sex offenders or other involuntary clients; or (3) 2,000 hours of experience in a secured correctional or community corrections environment. C. A sex offender counselor holding either degree must have training in the following areas or subjects: (1) 30 hours in child or adolescent development; (2) 12 hours in the treatment of cognitive distortions, thinking errors, and criminal thinking; (3) eight hours in behavioral therapies for sex offenders; (4) eight hours in relapse prevention; (5) eight hours in human sexuality; (6) eight hours in family systems; (7) four hours in crisis intervention; (8) four hours in the policies and procedures of the Minnesota criminal justice system; and (9) four hours in substance abuse. Persons who do not have the training required in this part shall have one year from their date of hire to complete the training.

Inspection Findings: A review of training files revealed that many staff had not completed the required training in substance abuse or family systems per this rule part. The facility indicates that some of the training did not take place due to COVID restrictions.

Corrective Actions: The facility shall provide sex offender program staff with all required training per this rule part within the first year of employment in the program. Training can be provided internally or through continuing education opportunities hosted by third-party groups. It should be noted that the facility relies mainly on the Department of Corrections provided sex offender specific training to meet the requirements of this rule part. The facility should source additional training partners.

2. Rule Requirement:

2955.0130 STANDARDS FOR DISCHARGE SUMMARIES. Subp. 3 Summary content. The discharge summary must include at least the following information: A. the admission date; B. the discharge date; C. reasons for the client being discharged from the program; D. a brief summary of the client's current conviction and past criminal record; E. the client's mental status and attitude at the time of discharge; F. prescribed medications at discharge; G. the client's progress in achieving individual treatment plan goals; H. an assessment of the client's offense cycle and protective and risk factors for sexual re-offense and other aggressive behavior; I. a description of the client's re-offense

prevention plan, including what changes in the client's re-offense potential have been accomplished and what risk factors remain; J. the client's aftercare and community reentry plans; and K. recommendations for aftercare and continuing treatment.

Inspection Findings: The current discharge summary content does not include all information required per this rule part, such as the reason for discharge from the program and the client's prescribed medications. This information is available to interested parties, however, is not printed on the discharge summary.

Corrective Actions: Revise discharge summary content to include all required information per this rule part.

3. Rule Requirement:

2955.0150 STANDARDS FOR DELIVERY OF SEX OFFENDER TREATMENT SERVICES. Subp. 5 Size of group therapy and psychoeducation groups. Group therapy sessions must not exceed ten clients per group. Psychoeducation groups must not exceed a sex offender treatment staff-to-client ratio of one-to-16.

Inspection Findings: The facility has a variance that allows 11 clients rather than 10 clients in their program groups. This variance is expired and requires updating. This is in process and will be completed once the inspection is submitted.

Corrective Actions: The facility has submitted a variance to cover the next inspection period which will be processed once this inspection is submitted.

If you have any questions or need more information, please do not hesitate to contact me at 651-274-4781 or email me at lauren.bizzotto@state.mn.us.

Thank you,



Lauren Bizzotto
Facility Detention Inspector
Inspection & Enforcement Unit

cc. John Gross, Anoka County Secure, Administrative Director
Michael O'Brien, Sex Offender Specific Program Clinical Supervisor
Jesse Clark, Sex Offender Specific Program Treatment Coordinator
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