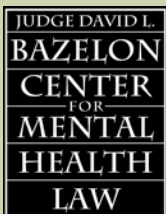




A L L I A N C E F O R T H E
**Safe, Therapeutic & Appropriate
Use of Residential Treatment**

The Alliance for the Safe, Therapeutic and Appropriate use of Residential Treatment (A START) believes that residential programs serving children with special mental health challenges should be properly licensed and monitored by state government, and accredited by independent accrediting organizations. A START is co-sponsored by the Department of Child and Family Studies of the University of South Florida and the Bazelon Center for Mental Health Law.



October 18, 2005

Honorable Members of Congress
United States House of Representatives
Washington, DC 20515

Dear Members of Congress,

As mental health professionals and leaders in the children's mental health field, we join together to express our serious concern about the large number of youth with mental disorders now housed in unregulated and unlicensed residential treatment facilities frequently referred to as therapeutic boarding schools, emotional growth schools and behavior modification programs. Many of us are individual clinicians, and as such we usually refrain from entering the public policy arena, yet the threat posed by this new institutionalization of children is so serious that we feel we can no longer remain silent.

In the last fifteen years, unlicensed privately run residential programs for youth with mental and emotional problems have proliferated. Hundreds of new programs now market aggressively over the Internet preying upon desperate families who seek help for their children. These worried families pay enormous sums—facilities cost up to \$100,000 per year—to obtain “treatment” for their troubled children. The programs are located around the country, and even outside the country, and often times children are transported hundreds, if not thousands, of miles across state lines to these programs.

The reality of what occurs in some of these unregulated programs is often quite different from the highly individualized, highly structured programs advertised to parents. These programs are troubling for a number of reasons:

- Children are often prohibited from speaking with their own families for months, in some cases for up to a year, a practice which has been shown to have significant negative clinical outcomes for children and adverse consequences for families.
- Seclusion and restraint procedures are significantly more restrictive than what is generally accepted by mental health licensing and accrediting bodies. These practices have resulted in several documented deaths.
- Even though the needs of the children housed in these facilities are great, unqualified staff is charged with implementing treatment plans and supervising children.
- The educational services provided to the children often fail to meet even minimum standards.
- No research has demonstrated that these programs have long-term clinical effectiveness.

Even more alarming is that abuse and neglect are all too common within these facilities. There have been many highly public media accounts of atrocious examples of sexual and physical abuse and medical neglect in these facilities. Yet, there is still little to no public oversight, leaving these already emotionally fragile children even more vulnerable. The lack of oversight in these facilities also means that the full scope of the crisis is unknown.

Alternatives exist to meet the needs of these children—options that work better and cost less. As the Surgeon General’s Report on Mental Health reported in 1999, “the most convincing evidence of effectiveness is for home-based services and therapeutic foster care.” A comprehensive system of care would dramatically reduce the number of children in these residential facilities because children could be served in their own communities, at a significantly reduced cost.

Today, we call on the General Accounting Office to conduct a study into the issue of children housed in unregulated residential treatment programs, so that the full extent of the problems in these facilities can be understood. We also urge Congress to enact legislation to increase protections for children in these residential treatment facilities in the United States and abroad and to improve access to essential community and school-based mental health services.

Specifically, we urge lawmakers to enact the following bipartisan, commonsense proposals that would effectuate the

President Bush’s New Freedom Commission’s call to “swiftly eliminate unnecessary and inappropriate institutionalization” and that would increase protections in residential treatment programs:

- The End Institutionalized Abuse Against Children Act (H.R. 1738)
- The Keeping Families Together Act (H.R. 823 / S. 380)

Too little information is known about the extent of the problems and abuses, and yet what is known is the cause of great concern. As children’s mental health professionals and leaders, we believe that at best, these programs do not meet the needs of most children with serious emotional or mental health disorders and, at worse, they subject children to abuse. We believe that parents unknowingly put their children in harms’ way when they send their children to these programs, expecting good treatment and education. The undersigned organizations and individuals look forward to working with Members of Congress to enact these reforms.

ON BEHALF OF:

A START	C. Kimo Alameda, Ph.D. Director, Office of Multicultural Service Hawaii Department of Health Honolulu, HI	Stacy Becker, Psy.D. Licensed Psychologist & Clinical Supervisor Valley Coordinated Children’s Services Los Angeles County Department of Mental Health Reseda, CA	Eric J. Bruns, Ph.D. Assistant Professor Department of Psychiatry and Biobehavioral Sciences Division of Public Behavioral Health & Justice Policy University of Washington School of Medicine Seattle, WA
American Psychological Association			
American Association of Community Psychiatrists			
American Orthopsychiatric Association	Mudita A. Bahadur, Ph.D. Licensed Psychologist Early Intervention Specialist Saint John’s Health Center Santa Monica, CA	Lenore Behar, Ph.D. Director Child & Family Program Strategies Durham, NC	Nicki Bush, M.S. Doctoral Student Child Clinical Psychology University of Washington Seattle, WA
Child Welfare League of America			
Federation of Families for Children’s Mental Health	Susan Bailey, M.D. John Hopkins University School of Medicine Baltimore, MD	Marilyn Benoit, M.D. Immediate Past President American Academy of Child & Adolescent Psychiatry Washington, DC	William Buzogany, M.D. Medical Director Lad Lake, Inc. Dousman, WI
National Youth Advocate Program, Inc.			
Tsila Abush-Kirsh, Ph.D. Licensed Clinical Psychologist Private Practice Tampa Palms, FL	Larry S. Baker, M.Div. Manager—Community Education Comprehensive Mental Health Center Tacoma, WA	Catherine Bergstrom, Psy.D.	Kellye M. Campbell, M.N., A.R.N.P. Department of Rehabilitative Medicine Harborview Medical Center Seattle, WA
Neal Adams, M.D. Los Angeles, California	Anne C. Bauer, M.D. Beth Baumeister, Ph.D. Post-doctoral Fellow Pediatric Psychology Children’s Hospital Los Angeles Los Angeles, CA	Lisa Bertaccini, L.C.S.W. Chief, Sacramento County Child and Family Mental Health Sacramento, CA	
Neal Adams, M.D., M.P.H. Director of Special Projects California Institute for Mental Health Sacramento, CA		Jim Braun President & CEO Youth in Need St. Charles, MO	Glorisa Canino, Ph.D. Director Behavioral Sciences Research Institute University of Puerto Rico San Juan, Puerto Rico
	Robert F. Baxter, M.D. Child and Adolescent Psychiatrist Bonita Springs, FL		

Bill Carter, L.C.S.W. Deputy Director California Institute for Mental Health Sacramento, CA	J. Michael Daly, L.C.S.W. Executive Director, CEO Kids Oneida Utica, NY	Robert Fathman, Ph.D. Child Clinical Psychologist; President, National Coalition to Abolish Corporal Punishment in Schools Co-Chair, EPOCH-USA: End Physical Punishment of Children Dublin, OH	Amy Green Doctoral Student Clinical Psychology University of South Florida Tampa, FL
Deborah Carter, M.D. Denver, CO	Max Dertke, Ph.D. Louis de la Parte Florida Mental Health Institute University of South Florida Tampa, FL	Joel Feiner, M.D. Dallas, TX	Jack Haggerty, M.D. Chapel Hill, NC
Sharon Chandler, R.N. Behavioral Health Bellingham, WA	Douglas C. Dicharry, M.D. Bellevue, WA	Jacqueline Feldman, M.D. Birmingham, AL	Scott W. Henggeler, Ph.D. Professor, Department of Psychiatry Director, Family Services Research Center Medical University of SC Charleston, SC
Andrew Christensen, Ph.D. Professor, Department of Psychology UCLA Los Angeles, CA	Gina Frajola Doyle Clinical Director, Dawn Project Choices, Inc. Indianapolis, IN	Robert Friedman, Ph.D. Professor/Chair Department of Child & Family Studies Louis de la Parte Florida Mental Health Institute University of South Florida Tampa, FL	Mario Hernandez, Ph.D. Director, Div. of Training, Research, Evaluation & Demonstration Department of Child and Family Studies Louis de la Parte Florida Mental Health Institute University of South Florida Tampa, FL
Lance Clark Assistant to the Director Oak Ranch Broadway, NC	Elizabeth Dunlap, M.N., A.R.N.P., C.S. Harborview Medical Center Seattle, WA	Reta Floyd, M.D. Los Angeles, California Jacquie Fritts Executive Director, Crime Victims Center of Fayette County Uniontown, PA	John M. Hitchcock, L.C.S.W. Executive Director Hillsides Home for Children Pasadena, CA
Michelle Clark, M.D. Los Angeles, CA	John E. Dunne, M.D. University of Washington Seattle, WA	C.R. Gallistel, Ph.D. Co-Director Rutgers Center for Cognitive Science Professor, Cognitive Science and Behavioral Neuroscience Rutgers University Piscataway, NJ	Kay Hodges, Ph.D. Professor Department of Psychology Eastern Michigan University
Chris Cline, M.D. Los Angeles, CA	Jim Efstation, Ph.D. Psychologist Kamuela, HI	Gladys Garcia, M.S.W. Portland, ME	Laura Hoeman Psychiatric ARNP Washington State
Kathy Cole-Kelly, M.S., M.S.W. Professor, Family Medicine School of Medicine Case Western Reserve University Cleveland, OH	Michael H. Epstein William Barkley Professor Dept. of Special Education & Communication Disorders University of Nebraska Lincoln, NE	Michael P. Golden, M.D., F.A.A.C.A.P. Interlake Psychiatric Associates PLLC Bellevue, WA	Charley Huffine, M.D. Child Psychiatrist Former President American Association of Community Psychiatrists Seattle, WA
Linda Coleman, Ph.D. Licensed Psychologist Tampa, FL	Monica Epstein, Ph.D. Assistant in Research Mental Health Law & Policy Louis de la Parte Florida Mental Health Institute University of South Florida Tampa, FL	Elena Gonzalez, L.C.S.W. Private Practice Santa Monica, CA	Mandy Ighani, M.S.W. Psychiatric Social Worker Valley Coordinated Children's Services Los Angeles County Department of Mental Health Reseda, CA
Paul Conti, M.D. Instructor Harvard Medical School Cambridge, MA	Clarissa Escobar, Ph.D. Waivered Clinical Psychologist Valley Coordinated Children's Services Los Angeles County Department of Mental Health Reseda, CA	Elaine Childs Gowell, Ph.D., A.R.N.P. Seattle, WA	Nathaniel Israel Visiting Assistant in Research Department of Child and Family Studies Louis de la Parte Florida Mental Health Institute University of South Florida Tampa, FL
Margaret Copi, M.D. Honolulu, HI	Warachel Faison, M.D. Durham, NC	Sonia Greaven, Ph.D. Psychologist (operating under government license waiver) Valley Coordinated Children's Services Los Angeles County Department of Mental Health Reseda, CA	
Jerry Costley, L.C.S.W. Licensed Clinical Social Worker Salt Lake City, UT			
Benjamin Crocker, M.D. Portland, ME			
Mario Cruz, M.D. Pittsburgh, PA			
Susan Czyk, M.Ed., CRC Director, Division of Child Mental Health Services Wilmington, DE			

Dennis Jacobson, L.I.S.W.
Faculty, Siouxland Medical
Education Foundation
Sioux City, IA

Courtney Kasinger
Communications Director
on behalf of Choices, Inc.
Indianapolis, IN

Kelly Kelleher, M.D., M.P.H.
Professor of Pediatrics and Public
Health
The Ohio State University
Columbus, OH

James Krag, M.D.
Medical Director
Valley Community Services Board
Staunton, VA

Anna Lau, Ph.D.
Assistant Professor
Department of Psychology
UCLA
Los Angeles, CA

Harriet P. Lefley, Ph.D.
Professor
Department of Psychiatry &
Behavioral Sciences
University of Miami School of
Medicine
Miami, FL

Melanie Leland, Ph.D.
Program Director
Valley Coordinated Children's
Services
Los Angeles County Department of
Mental Health
Reseda, CA

Russell Lim, M.D.
Davis, CA

Deborah Litberg, M.S.W., L.C.S.W.
Social Work Fellow
Children's Hospital Los Angeles
Los Angeles, CA

Pamela Marks
Administrator, Clinical Psychology
Training Program
UCLA
Los Angeles, CA

Steven C. Martaus, M.S.
Project Director
Children's Future Hillsborough
Achieve Management, Inc.
Tampa, FL

Kenneth J. Martinez, Psy.D.
Children's Behavioral Health
Director, Children, Youth and
Families Department
Santa Fe, NM

Neal Mazer, M.D.
CEO, Alisos Institute
Santa Barbara, CA

Jan McCarthy, M.S.W.
Director of Child Welfare Policy
Georgetown University Center for
Child and Human Development
Washington, DC

Hunter McQuiston, M.D.
New York, NY

Cynthia Meyers, Ph.D.
Clinical Psychologist
Tampa, FL

Joan Mikula
Assistant Commissioner
Child and Adolescent Services
Department of Mental Health
Boston, MA

Kenneth Minkoff, M.D.
Los Angeles, CA

Wanda B. Mohr, Ph.D., R.N.
Professor
School of Nursing
University of Medicine and
Dentistry of New Jersey
Newark, NJ

Mary Mohrhauser
Mental Health Specialist
Children and Adolescents
Iowa Department of Human
Services
Des Moines, IA

David Moltz, M.D.
Portland, ME

Richard Munger, Ph.D.
Director of Services Management
Western Highlands Network
Asheville, NC

Zev Nathan, M.D., Ph.D.
Santa Barbara, CA

Dennis J. Neuenfeldt, L.C.S.W.
Director of Residential Services
Lad Lake, Inc.
Dousman, WI

Adrian Novit, Ph.D.
Licensed Clinical Psychologist;
Coordinator
Clinic for Learning and Attention
Disorders
Saint John's Child and Family
Development Center
Santa Monica, CA

Fred Osher, M.D.
Baltimore, MD

Robert Paulson, Ph.D.
Research Professor
Department of Child and Family
Studies
Louis de la Parte Florida Mental
Health Institute
University of South Florida
Tampa, FL

Tom Pavkov, Ph.D.
Purdue University Calumet
Hammond, IN

Joyce Pearson
Mental Health Coordinator
Whatcom County Jail
Bellingham, WA

Bruce D. Perry, M.D., Ph.D.
Senior Fellow
The Child Trauma Academy
Houston, TX

Amy Pettila
Children's Board of Hillsborough
County
Tampa, FL

Kathy Poe
Family Support Provider
Wraparound Tulsa
Tulsa, OK

David Pollack, M.D.
Salem, OR

Clara Reynolds, L.C.S.W.
SED Network Project Manager &
Community Facilitator Hillsborough
County
Tampa, FL

Cindy Robison
NATIVE Health
Spokane, WA

Walter Rush, M.D.
Psychiatrist
St. Paul, MN

Walter Rush, M.D.
Minneapolis, MN

Sonja K. Schoenwald, Ph.D.
Associate Professor
Family Services Research Center
Psychiatry & Behavioral Sciences
Medical University of South
Carolina
Charleston, SC

Kristine J. Schwartz, M.A.
Alisos Institute
Santa Barbara, CA

Danielle Schwartz, M.S.
Director of Clinical Operations
Families First of Florida
Tampa, FL

David Shaffer, F.R.C.P. (Lond),
F.R.C.psych (Lond)
Philips Professor of Psychiatry and
Pediatrics
Department of Child Psychiatry
Columbia Univ. & New York State
Psychiatric Institute
New York, NY

Sarah Spain, Ph.D.
Cleveland, OH

Shelley Spear, Ph.D.
Senior Writer/Editor
Statewide Family Networks
Technical Assistance Center
United Advocates for Children of
California
Santa Barbara, CA

Nada Stotland, M.D.
Vice President of the American
Psychiatric Association
Chicago, IL

Jennifer Gregory Strope, Ph.D.
Licensed Psychologist
Stanford, CA

W. Carl Sumi, Ph.D.
Educational Researcher
SRI International

Marcia P. Taborga, Ph.D.
Mental Health Coordinator
Child Health Works
Los Angeles Department of Mental
Health
Los Angeles, CA

Jennifer Taub, Ph.D. Research Assistant Professor Center for Mental Health Services Research University of Massachusetts Medical School Worcester, MA	Kenneth Thompson, M.D. Pittsburgh, PA	University of Pittsburgh Pittsburgh, PA	Amy Winans Executive Director Association for Children's Mental Health Okemos, MI
Tammy L. Taylor, M.S. Program Coordinator Sexual Abuse Intervention Network Tampa, FL	Jane Timmons-Mitchell, Ph.D. Associate Clinical Professor of Psychology Department of Psychiatry Case Western Reserve University School of Medicine Center for Innovative Practices Cleveland, OH	Irene Ward Executive Vice President Catholic Community Services of Western Washington Seattle, WA	Michelle W. Woodbridge, Ph.D. Education Researcher SRI International Menlo Park, CA
Linda Teplin, Ph.D.	Alanna Gelbwasser Updegraff, Ph.D. Licensed Psychologist Private Practice & Oak Adoptive Health Center Akron Children's Hospital Akron, OH	Jill Waterman, Ph.D. Adjunct Professor of Psychology Coordinator, UCLA Psychology Clinic Los Angeles, CA	Jim Wotring, M.S.W.
Owen L. Coon Professor of Psychiatry and Behavioral Sciences Director, Psycho-Legal Studies Department of Psychiatry and Behavioral Sciences Feinberg School of Medicine Northwestern University Chicago, IL	Adena Vanderwielen, Ph.D. Valley Coordinated Children's Services Los Angeles County Department of Mental Health Reseda, CA	Al Way Director of Children's Services Mental Health Authority of Clinton- Eaton-Ingham Counties Lansing, MI	Penny Wyman on behalf of The Ohio Association of Child Caring Agencies Columbus, OH
Deborah Tharinger, Ph.D. Associate Professor Licensed Psychologist School Psychology Program Department of Educational Psychology University of Texas Austin, TX	Alex Vojick Child Advocate Greenfield Township, PA	Richard B. Weinberg, Ph.D., ABPP Diplomate in Clinical Psychology American Board of Professional Psychology Clinical Associate Professor Louis de la Parte Florida Mental Health Institute University of South Florida Tampa, FL	Sally D. Yeatman, L.C.S.W. Licensed Clinical Social Worker Saint John's Child and Family Development Center Santa Monica, CA
Jean Thomas, M.D. Professor of Psychiatry and Behavioral Sciences Children's National Medical Center The George Washington University School of Medicine Washington, DC	M. Grace Walters, M.D. Clinical Assistant Professor Department of Psychiatry	Marian E. Williams, Ph.D. Early Childhood Mental Health Programs USC-University Affiliated Program Children's Hospital Los Angeles Los Angeles, CA	Susan W. Yelton, M.S.W. Child Advocate