



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 cosponsored 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

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American Orthopsychiatric Association

Child Welfare League of America

Federation of Families for Children's Mental Health

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