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**ELECTRONICALLY FILED**  
Superior Court of California,  
County of San Diego  
**11/27/2019** at 01:09:00 PM  
Clerk of the Superior Court  
By Carolina Miranda, Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SAN DIEGO – CENTRAL DIVISION

CHILDREN OF THE  
IMMACULATE HEART,  
  
Plaintiff;  
  
v.  
  
KIMBERLEY JOHNSON, et al.,  
  
Defendants.

Case No.: 37-2019-0006176-CU-WM-CTL

**IMAGED FILE**  
  
**DECLARATION OF GRACE WILLIAMS  
IN SUPPORT OF PLAINTIFF’S EX  
PARTE APPLICATION FOR TRO AND  
ORDER TO SHOW CAUSE**

Date: December 3, 2019  
Time: 8:30 a.m.  
Dept.: C-64  
Judge: Hon. John S. Meyer

1 I, GRACE WILLIAMS, declare:

2 1. I am the Founder and Executive Director of Children of the Immaculate Heart (CIH),  
3 the plaintiff in this action. I have personal knowledge of each fact stated in this Declaration, and if I  
4 were called as a witness, I would testify to the truth of these facts.

5 2. I am writing to attest to the religious discrimination that CIH has been subjected to by  
6 the California Department of Social Service’s (the “Department”) Community Care Licensing  
7 Division (CCL) and the Continuum of Care Reform Branch (CCR). This discrimination has surfaced  
8 in the past year during a four-year licensing process to open The Refuge, a Short-Term Residential  
9 Therapeutic Program (STRTP) for trafficked minor girls.

10 **Background of Our Application for a License to Open the Refuge**

11 3. CIH has been operating a program for formerly trafficked women with children since  
12 2014, but from the beginning of our founding, our Board wanted to open a program for trafficked  
13 minors.

14 4. In August 2015, I attended an orientation with CCL given by Licensing Program  
15 Analyst Carol Anderson. This was the first formal stage in applying for a license to open a residential  
16 treatment facility for trafficked minor girls ages 12-17. At this time, nothing was mentioned about  
17 the upcoming changes in the regulations for group homes in California from the passage of AB 403.

18 5. In 2016, going off the premise that we could move forward with opening a level 12  
19 group home for formerly trafficked girls, we hired a full-time consultant to help us develop this  
20 program in March of that year.

21 6. As we developed our Program Statement, we reached out to Child Welfare Services  
22 of San Diego County (CWS) seeking a “Letter of Support” for our program—the first step toward  
23 licensure. Upon my remembrance, CWS stated Eileen Marshall was the main contact. We contacted  
24 her several times, leaving her multiple messages.

25 7. We eventually received a voicemail from Marshall, in which she claimed San Diego  
26 would not be opening any new group homes for the rest of 2016. This was clearly different  
27 information than what we were given at our orientation in August 2015. CWS provided no more  
28 information on why or when things might begin to move forward on the County side.

1           8.       Despite the uncertainty, we continued to plan and raise funds for The Refuge because  
2 of the urgent need to help minor victims of sex trafficking in San Diego County.

3           9.       Later in 2016, the Department finally began to post information on its website about  
4 the AB 403 reforms that would be coming in 2017. In response, we developed our Program Statement  
5 in late 2016, planning to adapt it to the new licensing standards that would come out in 2017.

6           10.      The first version of STRTP “Interim Licensing Standards” (ILS) was issued in January  
7 2017. The Department never informed us about the new standards. We only found out by regularly  
8 checking the CCL website for updates.

9           11.      We began to adapt our Program Statement and Plan of Operation to the new standards.  
10 Yet CCL released a second version of the ILS in March 2017, which called for another revision to  
11 CIH’s Program Statement.

12          12.      During the application process, a prospective STRTP must secure a facility and  
13 address. So in February 2017, we began to rent a home in Escondido, the location of which is  
14 confidential to protect the girls from being tracked down by their pimps.

15          13.      Little did we know how long the licensing process would end up taking. Nor did we  
16 know how expensive it would become to rent a home that must remain empty and has so remained  
17 for over two and a half years now. To date, CIH has spent over \$150,000 on rent alone for this facility.  
18 This does not include utilities, furnishings, home improvements, fire safety certification, and various  
19 projects to meet the ILS.

20          14.      County agencies involved with the licensing process did not contact us until the  
21 middle of 2017. At that point, we began to receive some answers about moving forward.

22          15.      Finally, in September 2017, we submitted our Program Statement and Plan of  
23 Operation to the new committee that was in charge of issuing “Letters of Support,” comprised of  
24 staff from CWS, Probation, and Behavioral Health. The particular staff members that made up our  
25 committee were Charisma de Los Reyes, Eileen Marshall, Khemal Williams, Jenifer Williams,  
26 Amanda Lance-Sexton, Eileen Quinn-O’Malley, and Franke Andrade.

27          16.      The committee’s revisions, corrections, alterations, amendments, and additional  
28 revisions to CIH’s Plan of Operation lasted months. The committee finally issued approval of CIH’s

1 Plan of Operation dated May 8, 2018, and we received its Letter of Recommendation on June 7,  
2 2018. (Attached as **Exhibit A** is a true and correct copy of the Letter of Recommendation from the  
3 County Child Welfare Services, Behavioral Health Services, and Probation.)

4 17. Before receiving the Letter of Recommendation, CIH had prepared all of the rest of  
5 the paperwork necessary to apply for a STRTP license. So on June 8, 2018, the day after receiving  
6 our Letter of Recommendation, we submitted our completed STRTP licensing application to CCL.

7 18. CCL officials were surprised when we walked into their San Diego office with our  
8 application binder ready for submission. CCL told us CIH was the first organization to apply to open  
9 a new group home in San Diego County since 2015.

10 19. Indeed, CCL officials did not even know the cost of the new application fee, so they  
11 asked if we preferred to pay the old fee and come back if there was a difference to make up, or if we  
12 just wanted to come back after they figured out what the new fee was. We, of course, wanted to pay  
13 the old fee so that we could submit our application immediately. At that point, we had spent hundreds  
14 of thousands of dollars on The Refuge.

15 20. We received no formal communication from CCL or CCR from June 8, 2018, until  
16 February 11, 2019.

17 21. In October 2018, however, Carol Anderson, the CCL Licensing Program Analyst  
18 assigned to our application, told us on the phone that she had finished reviewing our application and  
19 that she was planning to have us licensed by the end of the month.

20 22. Overjoyed at this news, we immediately made this announcement to our generous and  
21 loyal donors, who have long waited to see the fruit of their charitable investment—rescuing trafficked  
22 girls in our community.

23 23. October 2018 came and went without receiving a license.

24 24. In November 2018, we held an open house at The Refuge for placement agents.  
25 Among other agencies attending was the RISE Court, which serves commercially sexually exploited  
26 children within the juvenile court system here in San Diego. The RISE court includes  
27 representatives from the County Probation Office, Public Defender's officer, the District  
28 Attorney's Office, Behavioral Health Services, and the Juvenile Court. (Attached as **Exhibit B** is a

1 true and correct copy of an email to me from Fanny Yu, the Deputy District Attorney at the San Diego  
2 County District Attorney Office’s Juvenile Division, dated October 30, 2018, confirming that RISE  
3 court officials would be attending the Refuge’s open house.)

4 25. Our main contact for the RISE Court at the time was Fanny Yu, the Deputy District  
5 Attorney at the San Diego County District Attorney Office’s Juvenile Division. Around 10-12  
6 members of the RISE court attended the open house. They spent about two hours touring the house,  
7 asking many questions about all aspects of our program. At the end of their time with us, one of the  
8 placement agents from Probation who works at the RISE Court asked us if they could reserve all the  
9 beds when it opened. Of course, we said yes!

10 26. RISE Court officials contact us regularly about when the home will open. Cynthia  
11 Gamboa, Supervising Probation Officer of the RISE Court, has reached out to us most often of late.  
12 (Attached as **Exhibit C** is a true and correct copy of an email from Cynthia Gamboa to me,  
13 dated July 5, 2019, in which she asks about the Refuge’s status.)

14 27. Roughly four months passed before we heard from CCL about our application. On  
15 February 11, 2019, Carol Anderson sent us an email, with an attached eight-page document.  
16 (Attached as **Exhibit D** is a true and correct copy of the eight-page attachment to Carol Anderson’s  
17 email.)

18 28. The first five pages were revisions from CCR to our Program Statement and Plan of  
19 Operation. The last three pages were revisions from CCL.

20 29. The substance and tone of their revisions surprised us. It was at this point—after a  
21 three-and-a-half-year process—that it became clear that certain CCR and CCL officials were  
22 evaluating our application with our Catholic beliefs as a specific factor and cause for concern.

23 **The Department Officials Begin to Show Hostility to our Religious Beliefs**

24 30. After reviewing the Department’s evaluation of our Program Statement we  
25 immediately became distressed that our religious beliefs might be the cause for the CCL to deny our  
26 license to operate The Refuge. After all, we had received the Letter of Recommendation from the  
27 County review committee in June 2018, and Carol Anderson stated in October 2018 that she reviewed  
28 our application and would issue the license that month. And we have received rave reviews from

1 County placement agencies and the San Diego juvenile court system. The Refuge has also been  
2 endorsed by San Diego County District Attorney Summer Stephan, who sent a letter to the  
3 Department dated September 8, 2017, recommending that the Department approve the Refuge’s  
4 application. (Attached as **Exhibit E** is a true and correct copy of San Diego County District Attorney  
5 Summer Stephan’s letter to the Department.)

6 31. Troubled by the content of their revisions, CIH had a “Technical Assistance” (TA)  
7 telephone conference on March 27 about our Program Statement. Government representatives  
8 included officials from CCL, CCR, CWS, and Behavioral Health.

9 32. On that call, we asked about CCL’s criticism in Section 16 of our Program Statement,  
10 a bullet point that stated: “Describe procedure for dispensing transition related medication for  
11 Transgender Youth.” (See Exhibit D.) We simply asked if dispensing transition related medications  
12 was a requirement for licensing.

13 33. Upon information and belief, Paul Van Veen of CCL in San Diego responded, “If I  
14 recall, yeah, you are required to, um, make sure, if they want those medications, they get those  
15 services and medications.”

16 34. We did not ask any further questions at that time about this.

17 35. We revised and resubmitted the application in April.

18 36. On June 20-21, we spent \$625 and sent two staff members to sponsor a table to  
19 advertise The Refuge to placement agents at the Chief Probation Officers of California’s annual  
20 conference entitled, “What Lies Ahead. ... CCR in 2019 and Beyond.”

21 37. Our attendance was a huge success. Since attending this conference, we have had  
22 placement agents *across California* reaching out to us wanting to place girls in our program. Indeed,  
23 over 20 agents *outside* San Diego County gave us their names, asking to be notified once we were  
24 licensed. (Attached as **Exhibit F** are true and correct copies of a contact list, business cards, and  
25 messages of agents who have expressed interest in placing children in the Refuge.)

26 38. And just on September 17, I received two calls from placement agents in other  
27 counties in California *desperately* needing to immediately place teenage girls in our program.

28 39. The need for The Refuge is indisputable. Many existing group homes and Short-Term

1 Residential Therapeutic Programs do not serve or are not equipped to serve CSEC youth, so  
2 placement agents from across the state urgently need a program *dedicated* to this particular  
3 population and their needs.

4 40. On July 12, over three months since we resubmitted our application, Carol Anderson  
5 emailed me two reviews of our STRTP application dated June 30 and July 11, respectively. Before  
6 sending this email with the reviews, on July 8, Ms. Anderson had asked us if we could do a technical  
7 assistance meeting on July 17 with officials from CCR, San Diego's Child Welfare and Behavioral  
8 Health Services, along with Ms. Anderson herself and another representative from CCL's San Diego  
9 office. (Attached as **Exhibit G** are true and correct copies of the June 30 and July 11 review notes of  
10 the Refuge from the Department.)

11 41. When I opened the revisions attached to Ms. Anderson's July 12 email, I was  
12 dismayed to find that this set of revisions was even *longer* than the last set of revisions we had  
13 received on February 11, 2019.

14 42. I was even more dismayed to see on the second page the following statement that  
15 came from CCR, reviewed by Policy Analyst Stacie Kinney:

16 Mission bullet states providing opportunities for their restoration in Jesus  
17 Christ...What is [sic] the youth is not religious? Does not have religious  
18 beliefs? Does not believe in Jesus Christ/GOD? The statement being made  
19 with victims of trafficking being in the same sentence is offensive. Youth  
20 who have been trafficked may have not lost their faith in their religion and  
it should not be assumed that they have!

21 43. There are three odd things about this statement. First, we have no religious  
22 requirements for our program. Second, our Plan of Operation *specifically* lists times of prayer as  
23 optional. Third, we never stated anything assuming youth would or would not have religious beliefs,  
24 nor that they would have lost them. Our mission statement found in Section A of the Plan of Operation  
25 that this paragraph from CCR responded to read as follows:

26 It is the mission of Children of the Immaculate Heart to serve survivors of  
27 human trafficking and provide opportunities for their restoration in Jesus  
28 Christ. We do this through housing and rehabilitation programs.

1 44. CCR’s response was profoundly disheartening. Our mission is so simple—there was  
2 nothing in it that we perceive to be offensive. It is only two sentences and hardly says anything at all,  
3 let alone anything that would make one think that we thought youth in the life would have lost their  
4 faith or that we expected youth to have faith at all.

5 45. I was also sad to see how they formatted the comment, with putting in all caps, “Jesus  
6 Christ/GOD,” repeated questions/question marks, all ending with an exclamation point. I perceived  
7 that there was a fair bit of emotion behind the writing of our review of our mission statement.

8 46. There is good reason to believe that the government official who read and reviewed  
9 our application had preconceived negative judgments about people with religious beliefs, which  
10 caused the reviewer to have a negative view of our entire program.

11 47. This was immensely discouraging given how much work and money we have poured  
12 into this program for the sole purpose of helping teenage girls escape a life of sex slavery.

13 48. It was even more disappointing because our mission statement has remained the same  
14 since we first applied in 2015, and in all the revisions that went back and forth between the County,  
15 State, and CIH, not one official had ever mentioned our mission statement either positively or  
16 negatively.

17 49. This begs the question: if there is a problem with licensing faith-based agencies, why  
18 would they wait until *now* to tell us, four years later and after we have poured \$564,737 of people’s  
19 privately donated money toward opening this STRTP?

20 **The July 17 Technical Assistance Meeting Confirmed the Religious Discrimination**

21 50. On July 17, we met with state and county officials for a technical assistance  
22 conference at CCL’s San Diego office. To help move our application forward, my staff and I prepared  
23 a comprehensive list of questions about CCL/CCR evaluation of our Program Statement so that we  
24 can meet and exceed their expectations.

25 51. During the meeting, Department officials sought clarification about our religious  
26 stance on several licensing standards. It appears to me that the meeting revealed potentially serious  
27 conflicts between the Department’s requirements and our religious beliefs.

28 52. For example, when we explained that our program had no religious requirements for

1 youth and that we serve youth of all religious or lack of religious backgrounds, CDSS asked “why is  
2 it even in there” and that “if it could be removed [from The Refuge’s Mission Statement] that would  
3 be great.”

4 53. We affirmed that we have no religious requirements for The Refuge’s staff or  
5 residents, such as going to church or participating in prayer, and that we could add a clause stating  
6 as much in our Plan of Operation to satisfy the requirements for licensure.

7 54. But we also stated that we could not remove references to our religion from our  
8 mission statement because CIH is a religious nonprofit. CCR said we could put in a non-  
9 discrimination clause to make the mission statement more clear that we serve youth of all religious  
10 backgrounds. We did that with our second revised application we submitted on August 6.

11 55. Next, we asked about girls in our program who may want to attend LGBT community  
12 events. We asked if we could meet that requirement by writing that youth wishing to attend such  
13 events could state so as part of their Needs and Services Plan. Then, at any time, the girl’s placement  
14 agent, family member, or friends approved by their placement agent could take them to these events  
15 or groups.

16 56. We explained that it would violate our conscience as a Catholic agency to provide this  
17 transportation, even though we would never discriminate against any youth in our program.

18 57. After a moment of silence, CCR Policy Analyst Stacie Kinney, who conferenced in  
19 by phone from Sacramento, asked us if we would provide transportation to a girl who became  
20 pregnant while at The Refuge if she wanted to terminate her pregnancy or to obtain contraceptives.

21 58. I said that it would be the same issue and that someone else could provide  
22 transportation for that.

23 59. Stacie replied, “This is going to be a much bigger problem than I thought” and that  
24 “we don’t normally hear this.” Stacie then told us that she would need to check with her management  
25 to see if we could meet the requirement in the way we asked and said that she would speak with them  
26 as soon as the meeting was over, assuring us that she would have an answer for us by the end of the  
27 day. Stacie did not respond, so I followed up with emails in the week after and letters in the next two  
28 months until now, without receiving a response.

1           60.     Although Stacie Kinney stated she would discuss an accommodation with her senior  
2 manager, CWS-San Diego official Jessie Furrer stated that CWS expects The Refuge to provide  
3 transportation for LGBT residents to LGBT-affirming events or activities. Ms. Furrer added that  
4 receiving a County contract for funding, which is the next step after licensing in working with  
5 dependent youth, does require providing the transportation as a condition for contracting.

6           61.     We reaffirmed to Ms. Furrer that every program and activity at The Refuge will be  
7 inclusive of every resident, regardless of sexual orientation, gender identity, and gender expression,  
8 and that every resident will have full and equal access to every program and activity. We restated that  
9 The Refuge would not discriminate based on sexual orientation, gender identity, and gender  
10 expression in any program, policy, or activity.

11          62.     Ms. Anderson added that “these girls, where they come from, dating is going to be  
12 very important to them—so that is going to be an issue—sex, abortions, things like that, because of  
13 where they come from.” She told us that girls would complain about us and threatened that she would  
14 have to come “write you up.” I presume that means she would start a formal complaint investigation  
15 process against us.

16          63.     During the meeting, we also asked Department officials how The Refuge should  
17 proceed about revising the responses to the LGBT- and abortion-related requirements in the interim.  
18 Ms. Kinney advised us to leave the relevant responses blank in The Refuge’s revised application  
19 until she spoke with her manager.

20          64.     I never heard back from Ms. Kinney over what her manager had to say, so I followed  
21 up by email several times, copying Ms. Anderson on some emails. (Attached as **Exhibit H** are true  
22 and correct copies of email exchanges between CDSS officials, including Carol Anderson, Stacie  
23 Kinney, and myself.)

24          65.     After the meeting, while CIH’s Certified Administrator Amy Sorensen and I were  
25 signing simple paperwork and not talking about the meeting content, Ms. Anderson told us: “You’re  
26 just going to have a problem with that religious thing.”

27          66.     Ms. Anderson’s veiled threat certainly makes us uncomfortable having her overseeing  
28 our license and facility, knowing that she sees our program in a negative light because of our religious

1 beliefs.

2 67. On July 29, two days after the meeting, the CDSS sent us a Notice of Incomplete  
3 Application. (Attached as **Exhibit I** is a true and correct copy of the CDSS’s letter Notice of  
4 Incomplete Application.) On July 25, Ms. Anderson sent me an email asking, “Can you give me a  
5 call,” which I did. On that call, Ms. Anderson stated that our religious objections to providing  
6 transportation to LGBT events and to procure abortions or contraception was a problem, stating “It’s  
7 the law; you just have to comply with the law.”

8 68. On August 6, 2019, we sent the CCL and CCR our revised Plan of Operation and  
9 Program Statement in a way that both satisfies our conscience and meets the licensing requirements.  
10 We identified our non-discrimination policy and also identified that residents could obtain their own  
11 transportation to certain events or to obtain certain services through their placement agent, family  
12 members, or friends designated by their placement agent or Child and Family Team.

13 69. We have still received no response to our revised Plan of Operation and Program  
14 Statement. We sent two letters, dated August 22, 2019, and September 12, 2019, respectively, seeking  
15 clarification of the CDSS’s position regarding our application and our religious objections. (Attached  
16 as **Exhibit J** are true and correct copies of those letters.) We received a letter from the CDSS dated  
17 October 2, 2019, which stated that it received CIH’s letter and will provide a response by Friday,  
18 October 18, 2019. On October 17, 2019, we received a second letter from the CDSS, which stated  
19 that CCL and CCR officials needed more time to respond to our request for a response. (Attached as  
20 **Exhibit K** are true and correct copies of those letters.)

21 70. Compounding my concern over what seems like discrimination towards CIH as a  
22 religious organization is the fact that another local organization, Hidden Treasure’s STRTP called  
23 Tiffany’s Place, received its provisional license during the four-month period of hearing nothing from  
24 CCL. We started the licensing process before they did, submitted our actual application for licensing  
25 before they did, have more staff than they do and more relationships with County placement agencies,  
26 and worked with the same consultant and have the same core services, except that we are a religious-  
27 based organization and Hidden Treasures is not.

28 ///



1 by their disagreement—and even hostility—to our sincerely held Catholic beliefs about human  
2 sexuality, including sexual orientation, contraception, gender dysphoria, and abortion.

3 75. In the meantime, girls continue to go in and out of our court/Probation system,  
4 desperately in need of The Refuge to help them.

5 76. If we knew that we were not going to receive our license because of our sincerely held  
6 Catholic beliefs, we would have redirected that funding into helping the formerly trafficked women  
7 and their children that we are serving (currently 12 women and 18 children) who are in serious need  
8 of more services. Yet we continue to spend significant amounts of money on an empty house and  
9 staff, all because of our religious beliefs.

10 77. Neither Children of the Immaculate Heart nor The Refuge would discriminate against  
11 any girl based on their sexuality. *They deserve the same love, treatment, therapy, and support as any*  
12 *other girl at risk of sex trafficking.* And we have made it absolutely clear to CCL/CCR that we do  
13 not, never have, and never will treat anyone in our program disrespectfully because of their religious  
14 beliefs, sexual orientation, or lifestyle choice, or for any other reason.

15 78. Our Catholic beliefs are the foundation of what we do. The government is forcing us  
16 to uproot that foundation or otherwise let girls continue to be trafficked. The Constitution protects  
17 our right to serve these girls in honor of the Immaculate Heart of Mary, Mother of God and out of  
18 fidelity to God’s Holy Will, which is love and mercy itself.

19 **But suffering the most are the sex-trafficked girls who desperately need the Refuge**

20 79. Sadly, our religious beliefs should never have been an issue. The real issue—the real  
21 problem—is *that hundreds of teenage girls continue to be pimped out in our County every night.*  
22 Many of these poor girls are given a quota by their pimp that they have to make before they can come  
23 “home” and sleep. They could, right now, be safely sleeping at the Refuge, far away from pimps,  
24 gangsters, and traffickers.

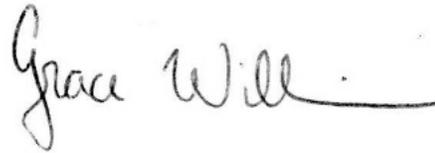
25 80. That CDSS considers our religious beliefs more problematic than the living hell of  
26 innocent girls being raped up to 10 times a day is heartbreaking.

27 81. That is why, on behalf of Children of the Immaculate Heart, I sincerely ask the Court  
28 to order CDSS to stop discriminating against us because of our sincerely held religious beliefs. And

1 that is also why we respectfully ask the Court to order the CDSS to make a decision in regards to our  
2 license so that we can serve these girls who suffer the most atrocious of crimes at such a young age  
3 and help them on their way to a new and successful future.

4 I declare under penalty of perjury under the laws of the State of California that the foregoing  
5 is true and correct.

6 Executed November 26, 2019, in San Diego, California.

7  
8 A handwritten signature in cursive script that reads "Grace Williams". The signature is written in black ink and is positioned to the right of the typed name.

9  
10 Grace Williams

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# **EXHIBIT A**



# County of San Diego

NICK MACCHIONE, FACHE  
AGENCY DIRECTOR

HEALTH AND HUMAN SERVICES AGENCY  
CHILD WELFARE SERVICES  
8911 BALBOA AVENUE, MAIL STOP W-473  
SAN DIEGO, CA 92123-1507  
(858) 616-5811 • FAX (858) 616-5908

CATHI PALATELLA  
DIRECTOR  
CHILD WELFARE SERVICES

5/8/18

## Children of the Immaculate Heart

### The Refuge

Grace Williams, CEO  
3143 Ryan Drive  
Escondido, CA 92025

## NEW SHORT TERM RESIDENTIAL THERAPEUTIC PROGRAM (STRTP) PROGRAM STATEMENT

Dear Grace Williams,

The County of San Diego received your program statement on 8/15/17 which was jointly reviewed by County of San Diego Child Welfare Services (CWS), Behavioral Health Services and Probation.

This letter indicates that after review of Children of the Immaculate Heart The Refuge program statement by County of San Diego Child Welfare Services, Behavioral Health Services and Probation there are no further comments or questions from this host county. Please note, this letter does not guarantee a county mental health organizational provider contract, continuous placements by CWS and/or Probation, or licensure.

Therefore, this correspondence serves as your letter of recommendation for inclusion in your license application packet to the California Department of Social Services (CDSS) for rate payment.

We, by signature, agree with the above statements:

  
CWS Director/Designee

  
BHS Director/Designee

  
Chief Probation Officer/Designee

**CATHI PALATELLA**  
**DIRECTOR**  
**CHILD WELFARE SERVICES**

# **EXHIBIT B**



## RISE court team attending Open House

6 messages

Yu, Fanny <Fanny.Yu@sdcca.org>

Tue, Oct 30, 2018 at 12:35 PM

To: Children of the Immaculate Heart <childrenoftheimmaculateheart@gmail.com>

Grace,

There will be around 8 of us from RISE court team coming to the Open House. Do you need each person's names? May I have the address please? I'm really looking forward to seeing you and touring The Refuge.

Thank you again,

Fanny

**From:** Children of the Immaculate Heart <childrenoftheimmaculateheart@gmail.com>

**Sent:** Tuesday, October 16, 2018 3:17 PM

**To:** Yu, Fanny <Fanny.Yu@sdcca.org>; Barreras, Janette <Janette.Barreras@sdcca.org>

**Subject:** Re: Automatic reply: Grace Williams' email

Hi Fanny and Janette,

Attached is the flyer to our open house! We would love to see you there.

Thank you!

Grace

On Tue, Oct 16, 2018 at 12:01 PM Yu, Fanny <Fanny.Yu@sdcca.org> wrote:

Thank you for your email. I am currently out of the office until Friday, Oct. 19, 2018. If you need immediate assistance regarding a case please contact my paralegal Janette Barreras at [Janette.Barreras@sdcca.org](mailto:Janette.Barreras@sdcca.org). For all other urgent matters please contact the Juvenile Division Receptionist during business hours Monday through Friday 8am to 5pm at (858) 694-4250 and they can connect you with someone who can assist.

Thank you,

Fanny Yu

Deputy District Attorney Juvenile Division

--

President/Executive Director

Children of the Immaculate Heart

[www.childrenoftheimmaculateheart.org](http://www.childrenoftheimmaculateheart.org)

[www.facebook.com/childrenoftheimmaculate](http://www.facebook.com/childrenoftheimmaculate)

(619) 431-5537

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**Children of the Immaculate Heart** <childrenoftheimmaculateheart@gmail.com>  
To: Fanny.Yu@sdcca.org

Wed, Oct 31, 2018 at 12:29 PM

Hi Fanny,

Wonderful - so glad to hear so many of you will be coming. The address is 3143 Ryan Dr., Escondido CA 92025

You don't need to send their names if they are part of the RISE court. Also, lunch will be provided - we forgot to put that on the flyer!

Thank you so much!

Grace

[Quoted text hidden]

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**Yu, Fanny** <Fanny.Yu@sdcca.org>  
To: Children of the Immaculate Heart <childrenoftheimmaculateheart@gmail.com>

Thu, Nov 1, 2018 at 9:29 AM

Grace,

Thank you for the address and on behalf of the RISE team a big THANK YOU for providing lunch. Members of the RISE team attending the open house will include members of Probation Department, Public Defender's office, DA's office, Behavioral Health Services, Juvenile Court Judge, and our service providers (STARS/ICare and North County Lifeline program managers).

We look forward to seeing you next Tuesday.

[Quoted text hidden]

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**Children of the Immaculate Heart** <childrenoftheimmaculateheart@gmail.com>  
To: Fanny.Yu@sdcca.org

Thu, Nov 1, 2018 at 11:39 AM

Thank you, Fanny!

[Quoted text hidden]

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**Children of the Immaculate Heart** <childrenoftheimmaculateheart@gmail.com>  
To: Christina Vasquez <cvasquez.cih@gmail.com>

Thu, Nov 1, 2018 at 11:39 AM

Just fyi!

[Quoted text hidden]

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**Christina Vasquez** <cvasquez.cih@gmail.com>  
To: Grace Williams <childrenoftheimmaculateheart@gmail.com>

Fri, Nov 2, 2018 at 8:20 AM

# **EXHIBIT C**

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**Update**

2 messages

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**Gamboa, Cynthia M.** <Cynthia.Gamboa@sdcounty.ca.gov>

Fri, Jul 5, 2019 at 1:30 PM

To: "Grace Williams (childrenoftheimmaculateheart@gmail.com)" <childrenoftheimmaculateheart@gmail.com>

Good afternoon Grace,

I wanted to see if you had any updates regarding your STRTP status?? We are hoping it is soon. Thank you!

Cynthia Gamboa

Supervising Probation Officer

RISE Court

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**Children of the Immaculate Heart** <childrenoftheimmaculateheart@gmail.com>  
To: "Gamboa, Cynthia M." <Cynthia.Gamboa@sdcounty.ca.gov>

Fri, Jul 5, 2019 at 5:00 PM

Hi Cynthia,

Thank you so much for reaching out! I regret to tell you that we are still waiting, but will for sure let you know when we know!

Have a good weekend!

Grace

[Quoted text hidden]

--  
President/Executive Director  
Children of the Immaculate Heart  
[www.childrenoftheimmaculateheart.org](http://www.childrenoftheimmaculateheart.org)  
[www.facebook.com/childrenoftheimmaculate](https://www.facebook.com/childrenoftheimmaculate)  
(619) 431-5537

# **EXHIBIT D**

## **The Refu e**

### **Plan of O eration**

#### **Section A - Vision, Mission, Purpose, Goals, and Philosophies**

A2: Methods Section-workability training bullet. Revise language or provide explanation for what is meant by statement "breaking welfare mentality and welfare dependency "

#### **Section D - Staff Plan**

##### **Section 2-Supervising Staff**

Typo found, "One of obers want to be visited by leadership and have direct communication with them as a valued team member"

##### **Training:**

- Provide the information about the trainers including their experience and qualifications.
- Provide a list of the community organizations that are partnered with for guest presenters for both orientation and other trainings provided to staff.
- Provide training information/list of the "professional growth library."
- Also provide a list of trainers and/or agencies used for the in-service education. Written information for initial training 8 hours minimum and "may" include 4 hours of shadowing.
- Provide detail about the team members considered "professional team members" training requirements. How many hours?
- Provide a clear description of required training of all staff that includes awareness and knowledge of the impact of abuse or trauma which includes how to reduce the risk or re-traumatization.
- Provide a description of required trainings that promote a trauma-informed understanding of the needs of specialized populations, including CSEC and youth of all SOGIEs.
- Did not indicate required staff to be CPR trained.
- Clearly state if all staff are required 40 hours of ongoing training.
- Provide a description of how to address secondary trauma experienced by staff

##### **Staff Evaluation:**

- Provide the employee appraisal forms:
  - Form 1- Employee Self-Evaluation
  - Form 2- Employee Performance Checklist
  - Form 3- Performance evaluation

#### **Section F - Statement of Admission Policies and Procedures**

##### **Facility serves:**

- Ambulatory, female CSEC victims, ages 12-17.

##### **Admission policies:**

- Clearly define the criteria/factors used to determine the "fit" of a youth into the program and include a more comprehensive explanation of:
  - What characteristics a given youth may have that would preclude the facility's ability to provide treatment

- Specific procedures by which the facility will determine if a given youth possesses any of these characteristics
  - Why the facility is unable to meet these specific needs
- Provide a list of staff position responsible for intake
- Provide a clear explanation of the facility's policies and procedures to develop an individualized transition plan that is trauma-informed for each child/NMD, upon entry, with well-defined permanency goals and continuity of care.
- Provide a detailed process for engaging and collaborating with interagency placement committee and child and family team.
- Did not provide pre-placement appraisals for NMDs to include confirmation that the NMD does not pose a threat to children in the facility
- Include TB results as part of the physical examination requirement
- Did not provide explanation/procedure to ensure there is no discrimination against any youth or NMD based on sexual orientation, gender identity or expression
- Did not provide procedures for special services (i.e., Special health care needs, Regional Center, etc.)

#### **Section H - Removal or Transfer Policies and Procedures**

- Provide policy for written approval from the child's authorized representative prior to transferring child/NMD.
- Explain process of how it is determined when STRTP can no longer meet a child/NMD's needs.
- Provide procedures for a NMD to transfer from an STRTP:
  - At least 7 days' written notice to the NMD and placement agency
  - Transfer shall state the reason for the transfer and request the NMD be placed elsewhere
  - Procedures for appropriately distributing the NMD's records
  - Procedures for NMD to continue receiving as needed services upon transfer

#### **Section K - Consultants and Community Resources to be Utilized**

- Describe how coordination and contracting will be done in a way that ensures the safety and well-being of specialized populations.
- Describe in more detail how the agency will provide or arrange for additional services and supports that are Trauma-Informed and meet the needs of the children and/or Non-Minor Dependents (NMDs) and families during placement and post-permanency. If contracting with another agency to provide services and supports, indicate which agency and which services and supports.

#### **Section N - Continuous Quality Improvement**

- Provide clear and descriptive written policies and procedures, and practices concerning continuous quality improvement.
- Provide more detail how the facility will continue to develop overall mission, vision, and values.
- Provide in more detail how the continuous quality improvement includes active inclusion and participation of staff, children, NMD, families, and community resources.
- Provide qualitative and quantitative data and information related to identified outcomes, indicators, and practice standards.

- Provide detail about agreement and/or contract with third party (Point Loma University) regarding how they will be measuring the success of the modalities and methods used.
- Also include the following information:
  - How the facility will review, analyze, and interpret the data
  - How the facility will take the data to inform and improve policies and procedures
  - How facility will use data to ensure that youth in specialized populations are being supported and not victimized
  - Describe how the facility will evaluate service delivery and assess outcomes associated with trauma-informed services
  - How the facility will evaluate its program's outcomes and results and provide them to the Department for review
  - Facility policies and procedures that will be put in place to make positive changes to program

## **Program Statement**

### **Section 1 - Population to be Served**

- Include whether the facility serves child welfare, probation, and/or privately placed youth.
- Include a description of the listed evidence-based or trauma-informed interventions and care for youths and NMDs.
- Provide how facility will measure success of supports to verify the effectiveness of its ability to serve differing needs
- Describe how the facility shall take precautions to protect child or NMD and others.

### **Section 4 - Core Services and Supports**

- Provide more information about the facility's ability to provide access to core services directly or through agreements with other agencies, or both
- Provide mental health services information regarding how direct resources and programs will be used to provide this core service.
- How provider will ensure that all core services specify trauma-informed interventions, practices, services, and supports that recognize and respond to the varying impact of traumatic stress on children, NMDs, and their families
- Attach agreement(s) with detailed reasoning for the contracting of specific core services and support, the relationship between the program and contracting agency, and information on how the program will ensure core services and supports are being met
  - Agreements should detail:
    - Reasoning for contracting specific core services
    - Relationship between the facility and contracting agency
    - Information on how facility will ensure contracted core services are met
    - And that the services are realistic for the population to be served
- Provide detail of how it will be ensured "active efforts" are in accordance with the Indian Child Welfare Act when providing core services to Indian children
- Provide description of how the facility will ensure services and supports provided protect the health and safety of children and NMDs and maintain the confidentiality and privacy of information and documentation

### **Section 5 - Trauma Informed Interventions and Treatment Practices**

- Specify position/person that will provide the training to staff on trauma informed care and their qualifications

- Provide policy on how trauma-informed interventions and treatment practices will be consistent with the needs and services plans, TILPS, and CFTs

#### **Section 6 - Development, Review, Implementation and Modification of Needs and Services Plan**

- Provide more detail about the policies and procedures to ensure that the youth's voice is central in NSP development.
- Describe which evidence-based or trauma-informed screening/assessment tools are used to identify trauma history, trauma-related symptoms, or problems.

#### **Section 7 - Planned Activities**

- Describe opportunities for individualized youth directed activities

#### **Section 8 - Services During Placement and Post Permanency**

- Describe in more detail how the agency will provide or arrange for additional services and supports that are Trauma-Informed and meet the needs of the children and/or Non-Minor Dependents (NMDs) and families during placement and post-permanency. If contracting with another agency to provide services and supports, please indicate which agency and which services and supports.

#### **Section 9 - Plan Participation in Child and Family Team**

- Include policies and procedures on how the provider will take an active role in initiating a CFT if needed.

#### **Section 10 - Identification of Home Base Care**

#### **Section 12 - Participation and Assistance in Initiatives to Improve the Child Welfare System**

#### **Section 14 - Children and Nonminor Dependents Personal Rights**

#### **Section 19 - Documentation of Accreditation**

- Provider reported the application for accreditation is attached to the email sent with their program statement and plan of operation on December 21, 2017.

#### **Section 20 - Mental Health Program Approval**

- Provide documentation of current mental health program approval as is required by ILS 87089.1
- List the county placing agencies from which you anticipate accepting placements
- List each county mental health plan which has responsibility for the provision of Specialty Mental Health Services (SMHS) to any child placed in the facility. Specify whether the facility has a contract with each county to directly provide SMHS in accordance with the Mental Health Program Approval Protocol. If the facility does not have a contract with each MHP responsible for SMHS, describe how the facility ensures that youth in placement from non-host counties receive the full range of SMHS required under the protocol
- Describe which mental health service, by county MHP, that the facility is at a minimum\* contracted directly to provide: Missing mental health services and Therapeutic Behavioral Services (TBS).

- Describe the referral, screening and assessment process used to establish eligibility with each county MHP for specific SMHSs.
- Provide a description of how the agency will collaborate and share information with Child Welfare, Probation, County Mental Health, Child and Family Teams (CFTs), and outside partners to ensure effective provision of care and services that are Trauma-Informed
- Demonstrate an understanding of the broad network of organizational providers in each county that provide SMHS services to children placed in the facility, as well the network of non-specialty providers (managed care or Fee-For-Service) available to meet the non-specialty mental health needs of children placed in the facility.
- Demonstrate an understanding of MHP specific appeal processes and describe facility appeal practices
- Identify where are you in the process of obtaining mental health program approval with the county.
- Provide more detailed information which providers you are contracted with to provide mental health services.
- Provider reported according to their understanding they have 12 months from the date of licensure to obtain a good standing a mental health program approval from DCSS, or from a delegated county Mental Health Plan therefore this section is missing most of the needed information.

#### **Section 22 - Emergency Intervention Plan (Runaway Plan)**

- Describe in more detail the facility's Emergency Intervention Plan, including a Runaway Plan and how staff will respond in trauma informed manner including how SOGIE or other specific characteristics are taken into account.
- Provide more detail how the agency will utilize Trauma-Informed practices to reduce law enforcement contact(s) as defined under AB 388.
- Explain clearly what are the factors/behaviors reasons why a youth would get a consequence of "losing a level." What other consequences are given?
- Provide the name and qualifications of Behavior Management Consultant who assisted in plan preparation.
- Include procedures for re-integrating the child back into the facility routine after an emergency intervention
- Provide criteria for assessing when EIP needs to be modified/terminated
- Provide criteria for assessing when the facility does not have adequate resources to meet the needs of a specific child/NMD
- Include that the Admissions Agreement must include written statement regarding the types of emergency interventions and must be reviewed with the child/NMD and authorized representative or parent at the time of admission.
- Provide procedures for biannual review of the use of emergency interventions and review in the emergency intervention plan
- Procedure for approval by the Board of Directors and received a copy of the approved plan
- Provide a protective separation room (ILS 87095.23)

## First Review Refuge STRTP Application 2/6/19

### 1 Population to Be Served

- a. Clarification needed on the term "domestic adolescent."
- b. Describe in detail how you evaluate who you can serve as it relates to disabilities (i.e I.Q. <68, non -ambulatory etc.) and why you can't serve various disabilities.
- c. Need cover sheet (9106A)

### 2. Emergency Response Services

- a. No cover sheet.
- b. Need specific staff positions doing specific trainings for emergency response.
- c. Recommend Office of Disaster Preparedness provide trainings
- d. Need "protocol "for notifying authorized representatives during client A.W.O.L.
- e. Staff trainings. Describe the following. 1. Topics covered in staff trainings 2. Time frames required of staff to complete trainings. 3. Verification that staff member has completed required trainings and evaluating competency. Qualifications of trainer
- f. Describe staff positions responsible for each type of emergency/disaster.

### 3. Transportation Arrangements

- a. No cover sheet
- b. Describe how program will ensure that transportation services will be provided to outside activities to include; LGBT programs and activities, medical and dental appts and religious activities. Describe who provides transportation and how it is provided.

### 11. Complaints and Grievances

- a. Signed copies of Complaint Procedures and Clients Rights not addressed.
- b. Describe how grievance/appeal process is Trauma Informed, Age and Developmentally Appropriate and Culturally Relevant.
- c. Describe how program ensures Clients Rights are not violated.
- d. No Cover Sheet

### 13. Family Visitation

- a. No Cover Sheet
- b. Describe how trauma informed practices are used to ensure successful communication and visitation with family and others involved in the youths' life.
- c. Describe how the program affirms/supports visits for Lesbian, Gay, Bisexual, Transgender, Queer/Questioning and Gender Expansive Youth.
- d. Describe how "Due Diligence" is implemented by staff to ensure the safety of CSEC children during visitation.
- e. Describe how program ensures that Clients Rights are protected during visitation.

## 15. House Rules for Children/Nonminor Dependents

- a. No cover sheet.
- b. Describe how trauma informed practices are integrated into house rules.
- c. Describe house rules regarding laundry.
- d. Describe how house rules are developmentally appropriate.
- e. Describe how house rules are applied with the Reasonable and Prudent Parent Standard.

## 16. Storage of Medication

- a. No cover sheet.
- b. Describe in detail how staff assist children with the self-administration of medications including psychotropic medications.
- c. Describe in detail who trains staff in handling medications, training staff qualifications, curriculum, number of hours of training, program evaluation of staff competency after completion of training. Training to include dispensing and destroying medication to include psychotropic meds. Please describe.
- d. Describe procedures for identifying staff responsible for dispensing and destroying medications.
- e. Describe how medications are stored properly (temp, not stored with food), etc.
- f. Describe procedure for dispensing transition related medications for Transgender Youth.

## 17. Positive Discipline Policies

- a. No cover sheet
- b. Describe in detail and by example how trauma informed practices are embedded in the discipline policies and procedures.
- c. Describe specific consequences for each type of behavior (i.e. assault, destruction of property, drug use, a.w.o.l).
- d. Describe in detail how a youth's sexual orientation, gender identity, religious beliefs, ethnic and cultural practices are not violated, discriminated against or punished.
- e. Describe how residents are given the opportunity to participate in the review and development of discipline policies and procedures based on ability and/or need.

## 18. Medical/Dental Services

- a. Cover Sheet missing.
- b. Describe procedures used to secure routine medical and dental care
- c. Describe which staff makes appointments
- d. Describe timeframes for medical/dental appointments for new residents.
- e. Describe how psychiatric emergencies are determined and who makes the assessment. Describe what steps are taken when a psychiatric emergency is determined.

- f. Describe staff trainings related to medical and psychiatric issues. Who does the training. Describe their qualifications, timeframes, evaluating staff competencies and documenting staff attendance. Provide the same information for the Health and Psychiatric training provided as requested above. Describe what medical services offered A.W.O.L. clients upon their return to facility.  
their return to the facility.
- g. Describe timeframes or these checkups
- h. Describe how staff will be trained to provide any special health care needs. Describe who does the training, their qualifications. What topics are covered?

#### 21. Food and Nutritional Plan

- a. No cover sheet
- b. Describe specific information on food and nutrition classes offered clients. Who provides the training and their qualifications? When are training offered?
- c. Provide copy of incidental inventory sheet used.
- d. Describe basic amount of clothing items allotted each resident.
- e. Describe how program determines that clothing offered is culturally relevant and consistent with sexual identity regardless of birth sex.
- f. Describe how program determines and distributes personal hygiene products to residents that are culturally relevant.

#### 23. Neighborhood Complaint Procedures

- a. No cover sheet

# **EXHIBIT E**

OFFICE OF  
**THE DISTRICT ATTORNEY**  
COUNTY OF SAN DIEGO  
SUMMER STEPHAN  
DISTRICT ATTORNEY

September 8, 2017

California Department of Social Services  
Community Care Licensing

**Re: Application for a License for Children of the Immaculate Heart and The Refuge**

Dear California Department of Social Services:

On behalf of the San Diego County District Attorney's Office, I write to provide information to support Children of the Immaculate Heart and The Refuge in their application to obtain licensing from the California Department of Social Services, Community Care Licensing. A copy of their program statement has been received and reviewed.

The Federal Bureau of Investigation has identified San Diego as one of 13 U.S. cities designated as a high intensity child prostitution area. A validated study about the scope of Sex Trafficking in San Diego County published by the National Institute of Justice in 2016 verified critical facts that we had been experiencing in law enforcement, prosecution and victim advocacy: Sex Trafficking in San Diego County is the second largest criminal industry in our region at \$810 million dollars annually, the estimate of victims is at an average of 5,000 victims annually, the average age of entry into sex trafficking is 16 years old and gangs are involved in 85percent of the sex trafficking activity. The study also identified a big gap in services for victims with about 33 residential beds available for victims and none specifically designated for minor victims of sex trafficking.

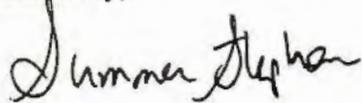
In 2015, we formed the San Diego County Human Trafficking Task Force lead by the California Department of Justice and that includes the District Attorney's Office and Deputy District Attorneys, DA Investigators and DA Victim Advocates as part of the Task Force. All members of the DA team have repeatedly experienced the challenges of providing an appropriate therapeutic safe home setting for minor victims. Despite all efforts, it is often not appropriate to return the minor to their home environment right away either because the home is part of the exploitation issue or because the level of trauma experienced by the minor is not suitable for placement in their original home.

In order to fill this important gap in services, Children of the Immaculate Heart and The Refuge have developed a short-term residential therapeutic program for Commercially Sexually Exploited Children. They plan to incorporate a home like setting into a therapeutic milieu to break the trauma bonds and help the victims recover from the atrocities they have endured in their exploitation. Their treatment team will create an individual treatment plan to meet the residential, therapeutic and educational needs of the child. Additionally, they are partnering with research committees to study their program for its effectiveness to share with other programs throughout the country.

Children of the Immaculate Heart is a strong partner with the San Diego County District Attorney's Office, proactively working towards ending human trafficking in San Diego County. They have been a constant presence in the fight against human trafficking by providing residential services to adult victims, serving on the Victim Services Committee of the San Diego County Board of Supervisor's Regional Human Trafficking/ CSEC Advisory Council and working collaboratively with community partners.

We highly support Children of the Immaculate Heart and The Refuge application and are fully committed to assisting in any way that would benefit its implementation.

Sincerely,



SUMMER STEPHAN

**District Attorney, San Diego County**

# **EXHIBIT F**

Keep Connected to Children of the Immaculate Heart!

Name	Email	Area of Interest	Date
Nikole Bell	nbell@sjgov.org	CPOC Conference	
James Davis	Jamesdavis@sjgov.org		
Michelle Gabriel	mgabriel@sjgov.org		
Anna Ross	aross@sjgov.org		
Ingram Tate	itate@mail.fresno.state.edu		
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Patrice Coleman	patrice.coleman@dss.ca.gov	CCR	
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Juri Campos	YCAMPOS@SJGOV.ORG		
Alison Brown	alison.brown@prob.sbcounty.gov		
KIKI WILLIAMS	KIKI.WILLIAMS@prob.cccounty.us		
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Therese Turcios	therese.turcios@sf.gov		
Shawn Lenahan	Shawn.Lenahan@rog.com		
Jason Hillis	hillisJC@kernprobation.org		
Edith Mata	Edithmata@kernprobation.org		
Annette Jones	jonesad@fresnocounty.ca.us		
Annette Juinter	ajuinter@acgov.org	Placement in STRIP	
Tara Flewelling	tflewelling@co.siskiyou.or.us	Placement	6.21.19

These placement agents signed up asking to be notified when we receive our license at the CPOC Conference on CCR

June 20-21, 2019.

1/1/11



## County of San Diego

KIMBERLY GIARDINA, MSW  
DEPUTY DIRECTOR  
HEALTH AND HUMAN SERVICES AGENCY  
CHILD WELFARE SERVICES

Policy and Program Support  
8965 Balboa Avenue  
San Diego, CA 92123

Phone (858) 616-5989  
Fax (858) 610-5835  
Mail Stop - W473  
Kimberly.Giardina@sdcounty.ca.gov

**Jack Witt**  
Program Development  
Manager

CPOC

"How high should  
you climb...  
How far do you  
want to see?"

[jcwitt@gmail.com](mailto:jcwitt@gmail.com)  
530-515-9708

[www.ElevateYouthSolutions.com](http://www.ElevateYouthSolutions.com)

CPOC

KEVIN SWARTZENDRUBER  
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CPOC



RITE OF PASSAGE  
WESTERN REGION

WILLIAM LARGE  
Director of Admissions

CSEC  
Program  
in NY

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[william.large@rop.com](mailto:william.large@rop.com)  
[www.riteofpassage.com](http://www.riteofpassage.com)

The following pages  
are business cards of  
placement agents and other  
government officials  
who want to be updated  
on the status of The  
Refuge or to place kids  
with us. *Cyria Witt*

**Jack Witt**  
Program Development  
Manager

CPOC

"How high should  
you climb...  
How far do you  
want to see?"

[jcwitt@gmail.com](mailto:jcwitt@gmail.com)  
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[www.ElevateYouthSolutions.com](http://www.ElevateYouthSolutions.com)



### County of San Diego

CPOC

**JENNY RODRIGUEZ**  
CHILD WELFARE SERVICES POLICY ANALYST  
HEALTH AND HUMAN SERVICES AGENCY  
CHILD WELFARE SERVICES

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### County of San Diego Probation Department

*Committed to Excellence*



**SARAH FAHL**  
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CPOC

**DEREK HOM**  
SUPERVISING PROBATION OFFICER

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### County of San Diego

**GLEND A. J. OLIVIER Ph.D**  
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CPOC

**Glenn County**  
Probation Department

**Tara Flewelling**  
Deputy Probation Officer

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541 West Oak Street  
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### County of San Diego Probation Department

*Committed to Excellence*



**Erinn Herberman, PhD, MPH**  
Research Director

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*Protect community safety, reduce crime and assist victims through offender accountability and rehabilitation.*



### THE COUNTY OF SAN DIEGO

**MATTHEW PARR**  
Policy Advisor  
Supervisor Dianne Jacob

Board of Supervisors  
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### County of San Diego Probation Department

*Committed to Excellence*



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### County of San Diego Probation Department

*Committed to Excellence*



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*Protect community safety, reduce crime and assist victims through offender accountability and rehabilitation.*

### County of San Diego Probation Department

*Committed to Excellence*



**SARAH FAHL**  
Deputy Probation Officer  
R.I.S.E. Unit

Special Operations Division  
2901 Meadow Lark Drive  
San Diego, CA 92123

Phone: (858) 694-4569  
Cell: (858) 275-0084  
sarah.fahl@sdcounty.ca.gov

PHONE CALL

FOR CIH DATE 11/17/12 TIME 5:48 A.M.  
P.M.

M Marka - Transition Case Manager

OF SD Youth Services Stone Front Shelter

PHONE (619) 415-1177 CELL 619-787-4376

MESSAGE World like to transfer a client to us. Asking for the type housing we offer.

SIGNED [Signature]

TELEPHONED  
 RETURNED YOUR CALL  
 PLEASE CALL  
 WILL CALL AGAIN  
 CAME TO SEE YOU  
 WANTS TO SEE YOU

PHONE CALL

FOR Jim DATE 8/24/18 TIME 11:15 A.M.  
P.M.

M Social Worker

OF SLO CWS

PHONE (805) 781-1774 CELL

MESSAGE STRTP - saw on website. Dependency kids?

SIGNED GW

TELEPHONED  
 RETURNED YOUR CALL  
 PLEASE CALL  
 WILL CALL AGAIN  
 CAME TO SEE YOU  
 WANTS TO SEE YOU

**PROBATION DEPARTMENT**  
 COUNTY OF IMPERIAL

CPOC



324 Applestill Road  
 El Centro, CA 92243  
 raulmanriquez@co.imperial.ca.us

Tel: (442) 265-2381  
 Tel: (442) 265-2400  
 Fax: (442) 265-2376

*"Committed to enhancing public safety by reducing recidivism, motivating behavioral change, enforcing court orders and advocating for victims."*

**PROBATION DEPARTMENT**  
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CPOC



324 Applestill Road  
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Tel: (442) 265-2381  
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CPOC



**RITE OF PASSAGE**  
 WESTERN REGION

**WILLIAM LARGE**  
 Director of Admissions

15011 LAGO DRIVE • RANCHO MURIETA, CALIFORNIA 95683  
 Cell: 916-753-5699 • Fax: 916-914-2419  
 william.large@rop.com  
 www.riteofpassage.com



**STATE OF CALIFORNIA**

Department of Social Services  
**Kelly Winston, LCSW**  
 Bureau Chief  
 Child Welfare Policy & Program Development

Children and Family Services Division  
 744 P Street, MS 8-11-87  
 Sacramento, CA 95814

(916) 651-6100  
 (916) 651-6325 Fax  
 kelly.winston@dss.ca.gov

CPOC

# **EXHIBIT G**

## Second Review Refuge STRTP Application 7/11/19

### 1. Family Visitation.

- a. Need more detail and specifics on how STRPT affirms/ supports LGBT, Gay, Bisexual, Transgender, Queer/Questioning, and Gender Expansive youth.

### 2. House Rules on Children and NMDs,

- a. Policy on prohibiting dating is too restrictive and abridges clients rights.

### 3. Food and Nutritional Plan // Sample Menu, Clothing & Incidentals

- a. General statement on cooking classes for residents is incomplete. Need specifics on who will do the training, what the training consists of and where the training will be held. Also how will residents competency be evaluated

### 4. Transportation Arrangements

- a. Statement needed on how transportation to off site schools are provided.

# The Refuge

Sunday, June 30, 2019 10:06 PM

PLEASE HIGHLIGHT ALL REVISIONS! INCLUDE AN UPDATED COVER PAGE FOR EVERY SECTION!

NONE OF THE SECTIONS MEET THE STANDARDS REQUIRED IN ILS V3!

## Section A - Vision, Mission, Purpose, Goals, and Philosophies

- This section does not include a sufficient description of how the STRTP will accomplish the goal of "reduction or elimination of the symptoms that led to their placement into a facility home' in a trauma-informed matter.
- This section does not make it clear the goal of providing youth with the services necessary to step down into a family-like setting. Additionally, this section does not mention anything regarding the timeframe of services provided to a youth and the expected timeframe or goal of how long a youth would be in the care of the STRTP and transitioned to a lower level of care.
- **Mission bullet states providing opportunities for their restoration in Jesus Christ... What is the youth is not religious? Does not have religious beliefs? Does not believe in Jesus Christ/GOD? The statement being made with victims of trafficking being in the same sentence is offensive. Youth who have been trafficked may have not lost their faith in their religion and it should not be assumed that they have!**

## Section D- Staff Plan

- Missing- A description of required training of all staff that includes awareness and knowledge of the impact of abuse and trauma, which includes how to reduce the risk of re-traumatization **ILS § 87078.2(a)(3)**
- Detailed plan to hire, supervise, evaluate, and train staff, peer partners, volunteers, and other qualified individuals **ILS § 87022(c)(6)**
- Missing- A description of required trainings that promote a trauma-informed understanding of the needs of specialized populations, including CSEC and youth of all SOGIEs **HSC § 1562.01(h)(2)(H,I) ILS § 87078.2(a)(3) WIC § 16001.9(a)(23) WIC § 16001.9(a)(25)**  
Training plan includes the following for each training session:
  - Course title and subject matter
  - Learning objectives and activities
  - Number of hours per training session
  - Qualification of the trainer
  - Training evaluation **ILS § 87065.1(b)(4)**
  - Comprehensive staff training plan, including but not limited to:
    - Initial 8-hour training for newly hired direct care staff
      - 8-hour training includes trauma-informed training
    - 16 hours of training for newly hired direct care staff within 90 days of hire
      - Administrator or designee assesses staff understanding of training within 30 days of completion of the 16 hour training
    - 16 additional hours of training for newly hired direct care staff within a year of hire
    - 40 hours of ongoing training for all staff

- Facility Manager training plan  
**ILS § 87065.1(c)(1) ILS § 87065.1(c)(1)(C) ,ILS § 87065.1(c)(2), ILS § 87065.1(c)(2)(B), ILS § 87065.1(d), ILS § 87065.1(a)**

#### Section F- Statement of Admission Policies and Procedures

- Position of staff responsible for the intake process?
- CSEC program and only accepts girls 12-17 who are survivors of CSEC
- How would you determine if a youth would require more attention than you would be able to provide? What kind of serious health issues?
- More than likely a youth will say they do not want to go to any program and would rather be with family/friends. What is the determination process if the program is a good fit for the youths need, but she says she doesn't want to go on the face to face interview? This will be more common than not so I am concerned that this may be a reason a youth is not accepted.
- Please include Procedures for documentation of referrals and denials  
**ILS § 87068.05(b)**
- Please include Elevated review procedures **ILS § 87068.05(d)**
- Please include Procedures for when a determination is made that the needs of the referred child cannot be met by the licensee **ILS § 87068.05(e-g)**

#### Section H- Removal or Transfer Policies and Procedures

- Please include Procedures to ensure that all relevant parties are informed of removal/transfer policies, including a trauma-informed explanation of such policies  
**ILS § 87068.1(c)(4), ILS § 87068.11(k)(3), ILS § 87068.4(a)(1)**
- Please include Policies and procedures ensuring social work staff to develop and maintain a written removal or transfer record **ILS § 87068.4€**
- Emergency removal procedures- please include What steps does the facility take to integrate the youth/NMD back into the facility? What services are provided to prevent this from happening again? Please be as specific as possible and include all steps. **ILS § 87068.4(d)**
- Procedures when STRTP suspects it can no longer meet a child/NMD's needs, including:
  - How facility will actively participate in placement preservation CFT
  - Which staff positions will be responsible for signing statements accompanying removal notices
  - How child/NMD will be notified of transfer/removal in a trauma-informed manner
  - Criteria for when to request a placement preservation CFT
  - How facility will ensure that county social workers or placement agencies are provided with the opportunity to give child/NMD 14 days' notice prior to transfer  
**ILS § 87068.4(c), ILS § 87068.4(c)(1), ILS § 87068.4(c)(2), WIC § 16010.7€**
- **It is concerning that after 3-days of being AWOL the youths belongings are packed up and the youths representative is contacted for pick up. Based off the population you are choosing to serve there will more than likely be a lot of girls who AWOL. If a youth AWOLS and decides she wants out the life and that she no longer wants to be in the game and returns back to the facility and is told her bed is no longer there this can be very traumatizing for a youth and could send her back into the game or with her exploiter.**

#### Procedures for a NMD to transfer from an STRTP

- At least 7 days' written notice to the NMD and placement agency
  - Transfer shall state the reason for the transfer and request the NMD be placed elsewhere
  - Procedures for appropriately distributing the NMD's records
  - Procedures for NMD to continue receiving as needed services upon transfer
- ILS § 87068.4(f), ILS § 87068.4(g)**

#### Section K- Consultants and Community Resources to be Utilized

- Describe how facility will engage, coordinate, and contract with community resources and partners, which include tribal partners, county placing agencies, law enforcement, schools, courts/attorneys and mental health providers, as well as how coordination and contracting will be done in a trauma-informed manner that ensures the safety and well-being of specialized populations **ILS § 87022(c)(16)**
- **Any LGBTQ/SOGIE community resources? How will you make these resources available to youth who request them?**

#### Section N- Continuous Quality Improvement

- Written policies and procedures, and practices concerning continuous quality improvement **ILS § 87081(a)**
- How CQI is based on overall mission, vision, and values? **ILS § 87081(b)**
- Describe Adoption of outcomes, indicators, and practice standards, including outcomes associated with trauma-informed and culturally relevant services **ILS § 87081(c)(1)**
- Collection of qualitative and quantitative data and information related to identified outcomes, indicators, and practice standards **ILS § 87081(c)(2)**
- How the facility will review, analyze, and interpret the data **ILS § 87081(c)(3)**
- How the facility will take the data to inform and improve policies, practices, and programs **ILS § 87081(c)(4)**
- How CQI program will be culturally relevant, trauma-informed, and age and developmentally appropriate **ILS § 87022(d)**

#### Program Statement

##### Section 1 - Population to be Served

- What do you mean by severe developmental disorders?
- Page 5 states measuring success through program evaluations taking by the clients. The program should be short term aimed around 6 months. Is this the exit survey? How is this helpful if the youth should be transitioned to a lower level of care by 6 months or so?
- Age range, sex, gender, and population of persons to be served by facility, including **whether the facility serves child welfare, probation, and/or privately placed youth ILS § 87022.1(b)(2)**
- **Please describe HOW your facility will utilize the interventions you have listed. You provided a description of them but it is not clear HOW the facility will utilize them or who from the facility will do so.** Practice models or interventions that will be utilized to serve specific populations, including a description of evidence-based or trauma-informed interventions and care for youths and NMDs **ILS § 87022.1(b)(2)(A)**

- How facility programs will demonstrate the ability to support differing needs of children, NMDs, and their families, including those from different backgrounds or experiences, including race, ethnicity, sexual orientation, gender identity, or a child/NMD who is gender non-conforming  
**ILS § 87022.1(b)(3)(A), ILS § 87022.1(b)(3)(B)**
- (For licensees that intend to specialize in care for children having a propensity for behaviors resulting in harm-to-self and others) Describe how the facility shall take precautions to protect child or NMD and others **ILS § 87022(c)(17)**
- How facility will engage the community, community-based organizations, or providers that work with specific population **ILS § 87022.1(b)(2)(A)(1)**

#### Section 4 - Core Services and Supports

#### **LS § 87078.1(a), ILS § 87078.1(b), ILS § 87022.1(a)(1)(2), ILS § 87022(b)(6)(7), ILS § 87078.2(a)(1)(2)(E)(F), ILS § 87078.2(a)(4)**

- Please Provide information regarding the core services in a specific and organized way and include the following:
  - Specialty Mental Health Services (SMHS) -Generally, until the program obtains MHPA (Mental Health Program Approval), all Medi-Cal specialty mental health services are accessed through the host county for all youth, including out of county youth under presumptive transfer. Please explain how this currently works, and then you may choose to include information on how these services will be provided following MHPA.
  - Transition Support Services- Provide additional details regarding the services provided to youth, and whether these are in-house services or provided through contract or agreement. There is a large description of the types of activities that may be included, but nothing specific about how this facility completes these activities.
- Educational, Physical, behavioral, mental health and extracurricular supports
- Include information on how the agency assesses the appropriate educational environment for youth. AB 490 requires youth to be placed in the least restrictive appropriate educational environment, but does not mandate that all youth go to public school.
- Indicate how the ed rights holder and CFT are involved in the decision regarding school placement
- Additional detail is required regarding behavioral and mental health services (aside from medi-Cal SMHS) provided by the facility or other provider.
- No detail is given regarding extracurricular. Detail how the facility supports extracurricular activities, how the facility determines which extracurricular activities youth may or may not participate in, and the type of support the facility provides.
- Transition to Adulthood services does not contain enough specific information.
- Indian Child Services- Include information on how the agency insures “active efforts”. This might include making contract with the tribe and tribal representative.
- Inadequate and not clear- How will facility ensure that all core services specify trauma-informed interventions, practices, services, and supports that recognize and respond to the varying impact of traumatic stress on children, NMDs, and their families?
- Please specify whether you have contracts with outside resources to provide these services or if you provide them all on your own in house.

- Please remove text book/other source language and ensure everything is in your own words.

### Section 5- Trauma Informed Interventions and Treatment Practices

- A list of interventions/treatment practices were provided but there isn't any information as to how those listed relate to the program or how the facility will utilize them.
- Describe how the facility will provide trauma-informed intervention, practices, services, and supports. Include how it will promote physical and psychological safety for children, NMDs, and families  
**ILS § 87078.2, ILS § 87022.1(a)(2)**
- Detail the trauma-informed interventions that will be used (evidence-based, promising practices, innovative practices and culturally specific healing practices, or practices for specialized populations) **ILS § 87078.2(a)(2)(4)(5)(6)**
- Identify observable behaviors that will be evaluated pertaining to effects of trauma-informed services **ILS § 87078.2(a)(2)(B)**
- Policy on how trauma-informed interventions and treatment practices will be consistent with the needs and services plans, TILPS, and CFTs **ILS § 87078.2(a)(2)(E)(7-8)**

### Section 6- Development, Review, Implementation and Modification of Needs and Service Plan

- 18 month stay.. This is not in line with CCR's goals and vision of short term.
- Describe the process for development of needs and services plans, including how program will ensure that needs and services plans are trauma-informed, culturally relevant, and age and developmentally appropriate **ILS § 87068.2(b), ILS § 87078.2(a)(5), ILS § 87078.2(a)(2)(E)**
- Describe how procedures ensure services meet the individual treatment needs of the child as assessed and in place at the time of placement **HSC § 1562.01(d)(2)(C)(iii)**
- Policies and procedures to ensure that NSP process takes into account the needs of specialized populations **WIC § 16001.9(a)(23)**
- Describe which evidence-based or trauma-informed screening/assessment tools are used to identify trauma history, trauma-related symptoms, or problems **ILS § 87078.2(a)(5)**
- Describe how procedures identify the anticipated duration of treatment, as well as the timeframe and plan for transitioning the child to a less restrictive family environment  
**HSC § 1562.01(d)(2)(C)(iii), ILS § 87022.1(b)(8)(B), ILS § 87068.2(a)**
- Describe how procedure ensure consistency with the case plan as developed by the county placing agency and recommendations by the child and family team **ILS § 87022.1(b)(8)(C), ILS § 87068.2©**
- How the procedures support reasonable parent standard **ILS § 87022.1(b)(8)(D), ILS § 87067**
- Procedures for modifications to NSP **ILS § 87068.3**

### Section 7- Planned Activities

- A written plan for individual child activities and group interaction activities, including

the following:

- Activities that require group interaction
  - Planned recreational activities to encourage socialization
  - Physical activities, including but not limited to games, sports and exercise
  - Appropriate use of unstructured leisure time
  - Educational activities, including attendance at an educational program in accordance with state law, and supervision of afterschool study
  - Educational services and remediation
  - Activities which meet the training, money management, and personal care, grooming needs, and any other independent living skills identified in the children's needs and services plans
  - Pre-vocational or vocational counseling
  - The development of community support systems for children to maximize utilization of non-mental health community services and other resources
  - Use of the residential environment to assist children in the acquisition, testing, and refinement of community living and interpersonal skills
- Policies for how extracurricular, enrichment, cultural, and social activities will be inclusive for specialized populations, including but not limited to children/NMDs of all SOGIEs, native youth, and children of varying religious/cultural backgrounds **WIC § 16001.9(a)(23)**
  - Describe the program's plan for providing a safe learning environment for specialized populations, including children/NMDs of all SOGIEs and commercially sexually exploited youth **WIC § 16001.9(a)(23)**
  - Policies to ensure that each child who is capable shall be given the opportunity to participate in the planning, preparation, conduct, cleanup, and critique of planned activities **ILS § 87079©**
  - Policies to ensure that for children 16 years of age or older, the licensee allows access to existing information regarding available vocational and postsecondary educational options **ILS § 87079(f)**
  - Describe any on grounds therapeutic activities/vocational trainings you provide in your facility, including skills taught, goals of the training, hands-on experience received, materials provided, number of hours per day/days per week, and funding **ILS § 87022.1(b)(2)(B)**
  - Provide a **SAMPLE DAILY ACTIVITY SCHEDULE** for one week, **including weekends and holidays ILS § 87079 e Is prayer optional? What if the youth is not religious or does not want to pray?**

#### Section 8- services During Placement and Post Permanency

- Name, location, and services provided by an agency or agencies that the applicant or licensee has partnered with, either formally or informally, to provide additional supports and services to families and children including nonminor dependents during care and after discharge. Include how such services will be ensured to be trauma-informed **ILS § 87022.1(b)(10), ILS § 87078.2(a)(4)(6)(7)**

#### Section 9- Plan Participation in Child and Family Team

- Describe facility plan for participation in the child and family team process, including an understanding of what constitutes a CFT, how a CFT is initiated, and when they should occur **ILS § 87022.1(b)(11), ILS § 87022.1(a)**
- How CFT meetings will be conducted in a manner that is trauma-informed,

culturally, relevant, and age and developmentally appropriate. Describe how agency will advocate through the child and family team meetings to affirm and support youth, including those in specialized populations

**ILS § 87078.2(a)(2-4), ILS § 87078.2(a)(7), ILS § 87022.1(a), ILS § 87022.1(b)(3) (B)**

#### Section 10- Identification of Home Base Care

- A description of how the facility, in accordance with the child's case plan and the child and family team recommendations, will provide for, arrange for the provision of, or assist in, both of the following:
  - Identification of home-based family settings for a child who no longer needs the level of care and supervision provided by a short-term residential therapeutic program.
  - Continuity of care, services, and treatment as a child moves to homebased family care or to a permanent living situation through reunification, adoption, or guardianship **ILS § 87022.1(b)(12)(A)(1-2)**

#### Section 12- Participation and Assistance in Initiative to improve the Child Welfare System

- This section is good.

#### Section 14- Children and Nonminor Dependents Personal Rights

- Policies and procedures that promote and ensure the personal rights of children and NMDs **ILS § 87022.1(b)(12)(E), ILS § 87072(d)**

#### Section 15- HOUSE RULES FOR CHILDREN/NONMINOR DEPENDENT

- **Cell phones not being allowed as well as dating is concerning. Violation of youths rights!**

#### Section 17- Discipline Policies and Procedures

- Page 88- The number one consequences that can happen is a loss of Level decided in the group process by peers. What is the group process and how is it trauma informed to have other youth/peers determine another youths consequences?
- How is it TI that a youth is punished (Level 0) for being admitted into a hospital?
- Group closure? How is this trauma informed?

#### Section 19 - Documentation of Accreditation

- Survey application submitted

#### Section 20- Mental Health Program Approval

- List the county placing agencies from which you anticipate accepting placements **ILS § 87089.1**
- List each county mental health plan which has responsibility for the provision of

Specialty Mental Health Services (SMHS) to any child placed in the facility. Specify whether the facility has a contract with each county to directly provide SMHS in accordance with the Mental Health Program Approval Protocol. If the facility does not have a contract with each MHP responsible for SMHS, describe how the facility ensures that youth in placement from non-host counties receive the full range of SMHS required under the protocol

- Describe the referral, screening and assessment process used to establish eligibility with each county MHP for specific SMHSs.
- Provide a description of how the agency will collaborate with Child and Family Teams (CFTs), consistent with the case plan **ILS § 87089.1(d)(2)**
- Demonstrate an understanding of the broad network of organizational providers in each county that provide SMHS services to children placed in the facility, as well the network of non-specialty providers (managed care or Fee-For-Service) available to meet the non-specialty mental health needs of children placed in the facility.
- Demonstrate an understanding of MHP specific appeal processes and describe facility appeal practices **ILS § 87089.1(d)(4)**
- Describe process to ensure MHS identified in the MHP client plan or a child and family team are accurately reflected in the needs and services plan **ILS § 87089.1(d)(1)**
- Describe efforts to reduce the use on psychotropic medications at the facility, including monitoring of clinical side effects and a description of non-pharmacological interventions used at the facility. Describe how these efforts are reflected in your CQI
- Describe how the facility will ensure access to integrated, appropriate specialty mental health services. This should include a description of which organizational providers are contracted to provide the full range of SMHS described under the Mental Health Program Approval Protocol to children in the facility during the interim, and what are the steps you are taking to obtain a SMHS contract through the county **ILS § 87022.1(b)(15)(B), ILS § 87089.1(d)(e)(f)**
- Identify whether mental health services provided by external organizational providers are provided onsite or at an alternative location
- Provide a copy of all Medi-Cal certifications and/or contracts that allow you to provide SMHS directly
- Include the process for providing Intensive Care Coordination (ICC) and Intensive Home-Based Services (IHBS) to children/youth in care 30 days prior to stepping down. And if you don't provide either services, explain why
- When children/NMD stepdown, does your SMH contract permit continuity of service while in a home setting. If so, for how long will services continue?

#### Section 22 - Emergency Intervention Plan (Runaway Plan)

- Describe how staff will respond to runaway children, as well as children outside of the facility property without permission who are still in view of the staff **ILS § 87095.24(a), ILS § 87095.24©**

- Explanation of how runaway plan is age and developmentally appropriate, culturally relevant, and trauma-informed. Include how the particular traumas of specialized populations, such as commercially sexually exploited youth, will be accounted for in this process **ILS § 87095.24(b), ILS § 87078.2(a)(2)(D), ILS § 87095.22(a)(3), ILS § 87022.1(a)**
- Policies and procedures for discussing runaway plan at time of admission, as well as how an individualized plan will be developed for youth with a history of running away or of commercial sexual exploitation **ILS § 87095.24(e)(1)**
- Describe the facility's policies and procedures concerning when and how to involve law enforcement in response to an incident in the facility, including how the agency will utilize trauma-informed practices to reduce law enforcement contact(s) as defined under AB 388 **ILS § 87072.1(d), ILS § 87095.01(e), ILS § 87095.22(f)(5)**
- Name and qualifications of Behavior Management Consultant who assisted in plan preparation **ILS § 87095.22(a), Title 17 § 54342(a)(13)(A)(1)-(7)**
- Appropriate to client population i.e., not re-traumatizing, not punishing, age and developmental appropriate **ILS § 87095.22(a)(1), ILS § 87095.22(a)(3)**
- How EIP is trauma-informed **ILS § 87078.2(a)(2)(D)**
- Names of facility personnel trained to use EIP, specific job classification with a description of the training plan **ILS § 87095.22(d)(1), ILS § 87095.22(g)**
- Description of Continuum of Emergency Interventions: **ILS § 87095.00(b), ILS § 87095.22(d)(2)**
  - Early interventions
  - Techniques, including manual restraints
  - Situations in which techniques will be used
  - Maximum time limits
  - When techniques are NOT used
  - Expected outcomes
  - Personal rights not violated
- Justification for restraints, reasonably applied to prevent assault **ILS § 87095.00(c)(1), ILS § 87095.22(f)**
- Procedures for ensuring the safety of the restrained child, including that the duration of the restraint ceases as soon as the danger of harm has been averted **ILS § 87095.00(c)(4), ILS § 87095.22(f)**
- The child receiving the restraint does not have any known medical or physical condition due to which there is reason to believe that the use of restraint would endanger the child/NMDs health **ILS § 87095.00(c)(5)**
- Procedures if one or more child/NMD requires the use of emergency intervention at the same time **ILS § 87095.22(d)(7)(8), ILS § 87095.66(a-d)**
- Procedures for re-integrating the child back into the facility routine after an emergency intervention **ILS § 87095.22(d)(9)**
- Criteria for assessing when EIP needs to be modified/terminated **ILS § 87095.22(d)(10)**
- Criteria for assessing when the facility does not have adequate resources to meet the needs of a specific child/NMD, along with how the facility will move forward to address those needs **ILS § 87095.22(d)(11)**
- Procedures for documenting each use of manual restraints in the child/NMDs

records

**ILS § 87095.22(f)(3), ILS § 87095.61(d)(e)**

- Procedures for reviewing each use of manual restraints with the child/NMD and authorized representative or parent **ILS § 87095.22(f)(4), ILS § 87095.68(b)©**
- Admissions Agreement must include written statement regarding the types of emergency interventions and must be reviewed with the child/NMD and authorized representative or parent at the time of admission **ILS § 87095.22(i)**
- Procedure for maintaining a monthly log of each use of manual restrains to include: Name of child, Date and Time of intervention, duration, facility staff in the restraint, intervention type and result of licensee review **ILS § 87095.61(f)**

# **EXHIBIT H**

**From:** [Children of the Immaculate Heart](#)  
**To:** [Anderson.Carol@DSS](mailto:Anderson.Carol@DSS)  
**Cc:** [Amy Sorensen](#)  
**Bcc:** [dpiedra@fcdflegal.org](mailto:dpiedra@fcdflegal.org)  
**Subject:** Follow up from TA call  
**Date:** Monday, July 22, 2019 5:05:00 PM

---

Hi Carol!

I hope your Monday is going well and that you had a good weekend. I wanted to follow up with you about the health and safety code that you mentioned came out of the situation with Olivecrest. You mentioned on the TA call that you could send us that reference. Thanks so much!

Any word from Stacie/CCR yet about our question in regards to transportation? In the call she or one of you mentioned that you could get an answer by the end of that day, but we are getting worried because it has been almost a week now. Could we please request an extension of the July 31st deadline? It will be difficult to meet that deadline without a clear answer as to whether or not we will be able to proceed with the licensing process given our concerns about protecting our conscience in regards to the question in Section K we discussed during the TA call.

Thanks so much for your response and consideration of granting us the extension!

Sincerely,

Grace Williams

--

President/Executive Director  
Children of the Immaculate Heart  
[www.childrenoftheimmaculateheart.org](http://www.childrenoftheimmaculateheart.org)  
[www.facebook.com/childrenoftheimmaculate](https://www.facebook.com/childrenoftheimmaculate)  
(619) 431-5537

**From:** [Children of the Immaculate Heart](#)  
**To:** [Daniel Piedra](#); [Amy Vance](#); [Amy Sorensen](#)  
**Subject:** Fwd: FW: Follow up from TA call  
**Date:** Tuesday, July 23, 2019 3:42:01 PM

---

----- Forwarded message -----

**From:** **Anderson, Carol@DSS** <[Carol.Anderson@dss.ca.gov](mailto:Carol.Anderson@dss.ca.gov)>  
**Date:** Tue, Jul 23, 2019 at 2:43 PM  
**Subject:** FW: Follow up from TA call  
**To:** Children of the Immaculate Heart <[childrenoftheimmaculateheart@gmail.com](mailto:childrenoftheimmaculateheart@gmail.com)>

Per Stacie, the extension is granted until August 6, 2019

Carol Anderson

Licensing Program Analyst

State of California Department of Social Services

Community Care Licensing Division

San Diego Children's Residential Program

Cell : (619) 417-2438

Office: (619) 767-2301

Fax: (619) 767-2252

[Carol.Anderson@dss.ca.gov](mailto:Carol.Anderson@dss.ca.gov)

**web:** [www.cclid.ca.gov](http://www.cclid.ca.gov)



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**From:** Kinney, Stacie@DSS <[Stacie.Kinney@dss.ca.gov](mailto:Stacie.Kinney@dss.ca.gov)>  
**Sent:** Tuesday, July 23, 2019 2:41 PM  
**To:** Anderson, Carol@DSS <[Carol.Anderson@dss.ca.gov](mailto:Carol.Anderson@dss.ca.gov)>  
**Subject:** RE: Follow up from TA call

That is granted.

---

**From:** Anderson, Carol@DSS  
**Sent:** Tuesday, July 23, 2019 2:37 PM  
**To:** Kinney, Stacie@DSS <[Stacie.Kinney@dss.ca.gov](mailto:Stacie.Kinney@dss.ca.gov)>  
**Subject:** FW: Follow up from TA call

Hi Stacie,

The Refuge is requesting an extension until August 6, 2019. Let me know if it ok to grant the extension.

Carol Anderson

Licensing Program Analyst

State of California Department of Social Services

Community Care Licensing Division

San Diego Children's Residential Program

Cell : (619) 417-2438

Office: (619) 767-2301

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**From:** Children of the Immaculate Heart <[childrenoftheimmaculateheart@gmail.com](mailto:childrenoftheimmaculateheart@gmail.com)>  
**Sent:** Tuesday, July 23, 2019 2:35 PM  
**To:** Anderson, Carol@DSS <[Carol.Anderson@dss.ca.gov](mailto:Carol.Anderson@dss.ca.gov)>  
**Subject:** Re: Follow up from TA call

Yes, until August 6th?

On Tue, Jul 23, 2019 at 2:34 PM Anderson, Carol@DSS <[Carol.Anderson@dss.ca.gov](mailto:Carol.Anderson@dss.ca.gov)> wrote:

I need a date.

Carol Anderson

Licensing Program Analyst

State of California Department of Social Services

Community Care Licensing Division

San Diego Children's Residential Program

Cell : (619) 417-2438

Office: (619) 767-2301

Fax: (619) 767-2252

[Carol.Anderson@dss.ca.gov](mailto:Carol.Anderson@dss.ca.gov)

**web:** [www.cclid.ca.gov](http://www.cclid.ca.gov)



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**From:** Children of the Immaculate Heart <[childrenoftheimmaculateheart@gmail.com](mailto:childrenoftheimmaculateheart@gmail.com)>

**Sent:** Tuesday, July 23, 2019 2:31 PM

**To:** Anderson, Carol@DSS <[Carol.Anderson@dss.ca.gov](mailto:Carol.Anderson@dss.ca.gov)>

**Subject:** Re: Follow up from TA call

How about 1 more week, until August 6th?

On Tue, Jul 23, 2019 at 2:18 PM Anderson, Carol@DSS <[Carol.Anderson@dss.ca.gov](mailto:Carol.Anderson@dss.ca.gov)> wrote:

How long of an extension?

Carol Anderson

Licensing Program Analyst

State of California Department of Social Services

Community Care Licensing Division

San Diego Children's Residential Program

Cell : (619) 417-2438

Office: (619) 767-2301

Fax: (619) 767-2252

[Carol.Anderson@dss.ca.gov](mailto:Carol.Anderson@dss.ca.gov)

**web:** [www.cclcd.ca.gov](http://www.cclcd.ca.gov)



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**From:** Children of the Immaculate Heart <[childrenoftheimmaculateheart@gmail.com](mailto:childrenoftheimmaculateheart@gmail.com)>

**Sent:** Tuesday, July 23, 2019 2:16 PM

**To:** Anderson, Carol@DSS <[Carol.Anderson@dss.ca.gov](mailto:Carol.Anderson@dss.ca.gov)>

**Cc:** Amy Sorensen <[asorensen.cih@gmail.com](mailto:asorensen.cih@gmail.com)>

**Subject:** Re: Follow up from TA call

Hi Carol!

I just wanted to ask again, will we be able to get an extension past July 31st?

Thanks for letting me know!

Sincerely,

Grace Williams

On Mon, Jul 22, 2019 at 6:42 PM Children of the Immaculate Heart  
<[childrenoftheimmaculateheart@gmail.com](mailto:childrenoftheimmaculateheart@gmail.com)> wrote:

Thank you!

On Mon, Jul 22, 2019, 5:22 PM Anderson, Carol@DSS  
<[Carol.Anderson@dss.ca.gov](mailto:Carol.Anderson@dss.ca.gov)> wrote:

I will look for the health and safety law regarding discrimination.

Carol Anderson

Licensing Program Analyst

State of California Department of Social Services

Community Care Licensing Division

San Diego Children's Residential Program

Cell : (619) 417-2438

Office: (619) 767-2301

Fax: (619) 767-2252

[Carol.Anderson@dss.ca.gov](mailto:Carol.Anderson@dss.ca.gov)

**web:** [www.cclid.ca.gov](http://www.cclid.ca.gov)

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**From:** Children of the Immaculate Heart  
<[childrenoftheimmaculateheart@gmail.com](mailto:childrenoftheimmaculateheart@gmail.com)>  
**Sent:** Monday, July 22, 2019 5:05 PM  
**To:** Anderson, Carol@DSS <[Carol.Anderson@dss.ca.gov](mailto:Carol.Anderson@dss.ca.gov)>  
**Cc:** Amy Sorensen <[asorensen.cih@gmail.com](mailto:asorensen.cih@gmail.com)>  
**Subject:** Follow up from TA call

Hi Carol!

I hope your Monday is going well and that you had a good weekend. I wanted to follow up with you about the health and safety code that you mentioned came out of the situation with Olivecrest. You mentioned on the TA call that you could send us that reference. Thanks so much!

Any word from Stacie/CCR yet about our question in regards to transportation? In the call she or one of you mentioned that you could get an answer by the end of that day, but we are getting worried because it has been almost a week now. Could we please request an extension of the July 31st deadline? It will be difficult to meet that deadline without a clear answer as to whether or not we will be able to proceed with the licensing process given our concerns about protecting our conscience in regards to the question in Section K we discussed during the TA call.

Thanks so much for your response and consideration of granting us the extension!

Sincerely,

Grace Williams

--

President/Executive Director

Children of the Immaculate Heart

[www.childrenoftheimmaculateheart.org](http://www.childrenoftheimmaculateheart.org)

[www.facebook.com/childrenoftheimmaculate](https://www.facebook.com/childrenoftheimmaculate)

(619) 431-5537

--

President/Executive Director

Children of the Immaculate Heart

[www.childrenoftheimmaculateheart.org](http://www.childrenoftheimmaculateheart.org)

[www.facebook.com/childrenoftheimmaculate](https://www.facebook.com/childrenoftheimmaculate)

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--

President/Executive Director

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(619) 431-5537

--

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[www.facebook.com/childrenoftheimmaculate](https://www.facebook.com/childrenoftheimmaculate)

(619) 431-5537

--

President/Executive Director

Children of the Immaculate Heart

[www.childrenoftheimmaculateheart.org](http://www.childrenoftheimmaculateheart.org)

[www.facebook.com/childrenoftheimmaculate](https://www.facebook.com/childrenoftheimmaculate)

(619) 431-5537

**From:** [Children of the Immaculate Heart](#)  
**To:** [Anderson, Carol@DSS](mailto:Anderson.Carol@DSS); [Kinney, Stacie@DSS](mailto:Kinney, Stacie@DSS)  
**Cc:** [Amy Sorensen](mailto:Amy.Sorensen)  
**Bcc:** [dpiedra@fcdflegal.org](mailto:dpiedra@fcdflegal.org)  
**Subject:** Do you have any word yet?  
**Date:** Thursday, July 25, 2019 1:50:52 PM

---

Dear Carol and Stacie,

I hope you have been having a good week! I wanted to follow up again about our question from the TA call about providing transportation to LGBTQ community events and protecting our conscience as a Catholic agency in general. On the phone you mentioned that you thought you would have an answer for us by the end of the day, but 8 days have passed now without a response.

We are just concerned about spending the time and money proceeding with the process without an end date of when we might have an answer if we will be able to comply with the standards in the way we stated. It would cost us approximately \$45,000 (staff salaries and facility expenses) to go through the next round of revisions if it only takes 3 months, knowing that we might be denied over these issues.

Let me know your thoughts or if you have received any word from management! Thank you so much!

Grace Williams

--

President/Executive Director  
Children of the Immaculate Heart  
[www.childrenoftheimmaculateheart.org](http://www.childrenoftheimmaculateheart.org)  
[www.facebook.com/childrenoftheimmaculate](https://www.facebook.com/childrenoftheimmaculate)  
(619) 431-5537

# **EXHIBIT I**



KIM JOHNSON  
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
744 P Street • Sacramento, CA 95814 • [www.cdss.ca.gov](http://www.cdss.ca.gov)



GAVIN NEWSOM  
GOVERNOR

July 19, 2019

Grace Williams  
Executive Director/CEO  
Children of The Immaculate Heart, The Refuge  
P.O. Box 13954  
San Diego, CA 92170

**SUBJECT: NOTICE THAT APPLICATION CURRENTLY FAILS TO MEET STANDARDS**

Dear Grace Williams,

This letter is to inform you that Children of The Immaculate Heart, The Refuge application(s) for a Short-Term Residential Therapeutic Program (STRTP) remains incomplete and does not meet the criteria for licensure. The facility application locations are as follows:

- 3143 Ryan Drive, Escondido, CA 92025 (The Refuge I) # 374603969

The California Department of Social Services provided your organization with information and technical assistance regarding the areas of your Plan of Operation and Program Statement that are incomplete on 7/17/2019. The revisions you submitted do not meet regulatory requirements under sections: ILS § 87022, 87022.1, 87065, 87065.1, 87068.1, 87068.2, 87068.22, 87068.3, 87068.11, 87072, 87072.1, 87078.1, 87089, 87089.1, 87095.61, 87095.69, 87095.22, 87095.23, 87095.24, 87095.65, HSC § 1562.01, WIC 361.2, 11462, 11461.2. The most concerning sections of your application are sections D. Staff Plan, F. Statement of Policies and Procedures, H. Removal or Transfer Policies and Procedures, 1. Population to be served, 20. Mental Health Program approval, and 22. Emergency Intervention Plan (Runaway Plan). As a result, your application(s) for a STRTP may be subject to denial.

Please submit the corrections or revisions on the attached STRTP Review Tool no later than July 31, 2019, to the CCR mailbox at [CCR@dss.ca.gov](mailto:CCR@dss.ca.gov) and your assigned Licensing Program Analyst (LPA). If you have any questions or concerns, please contact your assigned LPA.

Sincerely,



JESS TORRECAMPO, Chief  
Policy and Performance Bureau  
Continuum of Care Reform Branch  
Children and Family Services Division

c: Counties (providing letter of support and placing agencies)

Cheryl Treadwell, Chief, Foster Care Audits and Rates Branch

Jean Chen, Program Administrator, Statewide Children's Residential Program

Angela Carmack, Asst. Program Administrator, Northern California Region

Lenora Scott, Asst. Program Administrator, Southern California Region

Michael Ford, Manager, Foster Care Audits and Rates Branch

# **EXHIBIT J**



**Children of the Immaculate Heart**

P.O. Box 13954  
San Diego, CA 92170

August 22, 2019

**Via E-Mail & U.S. Mail:**

Ms. Stacie Kinney  
Policy Analyst  
Cal. Department of Social Services  
Continuum of Care Reform Branch  
744 P Street  
Sacramento, CA 95814  
[Stacie.Kinney@dss.ca.gov](mailto:Stacie.Kinney@dss.ca.gov)

Ms. Carol Anderson  
Licensing Program Analyst  
Cal. Department of Social Services  
Community Care Licensing Division  
7575 Metropolitan Drive #110  
San Diego, CA 92108  
[Carol.Anderson@dss.ca.gov](mailto:Carol.Anderson@dss.ca.gov)

**Re: License for Short-Term Residential Therapeutic Program (STRTP)**  
**Facility Name: The Refuge**  
**Facility No.: 374603969**

Dear Ms. Kinney and Ms. Anderson:

I am writing because I would like to get confirmation of the California Department of Social Services' (CDSS) position with respect to our religious objections to certain of CDSS's requirements for licensure to run a Short-Term Residential Therapeutic Program (STRTP) for Commercially Sexually Exploited Children (CSEC). As you know, I am the founder of a religious nonprofit called Children of the Immaculate Heart (CIH). Our mission is to serve survivors of human trafficking under the motto of "Restore All Thing in Christ." We currently operate a rehabilitation program for adult women with children who are survivors of sex trafficking. The program includes housing, case management, therapy, a support group, assistance with basic needs such as food and clothing, and partnerships with other organizations to provide medical and psychiatric care. We are now trying to open a STRTP for minors called The Refuge.

In July, Ms. Anderson emailed me two reviews of our STRTP application dated June 30 and July 11, 2019, respectively. Prior to sending this email with the reviews, Ms. Anderson had set up a technical assistance call for us with the Continuum of Care Reform Branch (CCR), and representatives from San Diego's Child Welfare and Behavioral Health Services, along with Ms. Anderson herself and another representative from Community Care Licensing (CCL) San Diego. I had several questions about the reviews, and prepared questions for the call which took place the following Wednesday, July 17, 2019.

During that technical assistance call on July 17, CDSS sought clarification about our religious stance on several licensing standards relating to human sexuality. It appears to me that the call revealed potentially serious conflicts between CDSS's requirements and our religious beliefs. Due to the seriousness of the potential conflicts, I think it is important to confirm in writing what was discussed. Please let me know if anything below is incorrect:



## Children of the Immaculate Heart

P.O. Box 13954  
San Diego, CA 92170

1. CDSS stated that “it would be best if” all references to religion were removed from The Refuge’s Mission Statement. On the phone CCR told us that they were “not even sure why” the religious reference was made in our mission statement.
  - 1.1. We affirmed that we have no religious requirements for The Refuge’s staff or residents, such as going to church or participating in prayer, and that we could add a clause stating as much in our Plan of Operation in order to satisfy the requirements for licensure.
  - 1.2. But we also stated that we could not remove references to our religion from our mission statement because CIH is a religious nonprofit.
2. Child Welfare Services stated that it expects The Refuge to provide transportation for LGBT residents to LGBT-affirming events or activities.
  - 2.1. We affirmed that every program and activity at The Refuge will be inclusive of every resident, regardless of sexual orientation, gender identity, and gender expression, and that every resident will have full and equal access to every program and activity.
  - 2.2. We affirmed that The Refuge will not discriminate on the basis of sexual orientation, gender identity, and gender expression in any program, policy, or activity.
  - 2.3. We asked whether we could not satisfy this requirement by making other accommodations, such as letting family, friends, or their placement agent take the resident to the event. CCR staff said they would have to speak to their management about this. But Ms. Anderson stated simply after the meeting: “You’re just going to have a problem with that religious thing.”
3. CDSS specifically asked about our position on contraception and abortion, including posing hypotheticals involving residents who may want to terminate their pregnancies or whether The Refuge will provide condoms and other forms of artificial birth control to residents.
  - 3.1. We responded that we would provide all of the minors at The Refuge with appropriate medical care, but that we could not take a minor to procure contraception or an abortion.
  - 3.2. Ms. Kinney said she would discuss CIH’s religious objections with her manager and respond by the end of the day (July 17, 2019).
4. We asked CDSS how the Refuge should proceed about revising the responses to the LGBT- and abortion-related requirements in the interim.
  - 4.1. Ms. Kinney advised us to leave the relevant responses blank in The Refuge’s revised application.

I never heard back from Ms. Kinney with respect to what her manager had to say, so I followed up by email several times, copying Ms. Anderson on some of the emails. On July 25, Ms. Anderson sent me an email asking “Can you give me a call,” which I did. On that call, Ms. Anderson essentially stated that our religious objections to providing transportation to LGBT



## Children of the Immaculate Heart

P.O. Box 13954  
San Diego, CA 92170

events and to procure abortions or contraception was a problem, stating “It’s the law; you just have to comply with the law.”

Since we cannot violate our religion, on August 6, 2019, we sent in our revised Plan of Operation and Program Statement. These revised documents should fix every problem that the CDSS identified except the LGBT- and abortion-related transportation requirements. For those, we identified our non-discrimination policy and also identified that residents could obtain their own transportation to certain events or to obtain certain services.

Every time that we have sent in a revised Program Statement and Plan of Operation, however, it has taken a very long time to hear back from CDSS (3 to 8 months). Right now, we pay approximately \$15,000 per month to maintain The Refuge and pay for the salaries of our development staff (Administrator, Executive Director, Office Manager). To date, we have also spent approximately \$600,000 in fees and costs since doing our orientation with CCL in August 2015 trying to secure a license for The Refuge. The fact that we have been trying since August 2015 to obtain a license is also confusing to many of our supporters. Numerous San Diego officials have all expressed eagerness to see The Refuge open up. This includes District Attorney Summer Stephan, Mary-Ellen Barret of the DA’s office, currently serving as the Chair of the San Diego Regional Human Trafficking/CSEC Advisory Council to the Board of Supervisors, the staff of the RISE Court, a court for CSEC youth within the juvenile courts of San Diego, primarily represented by Fanny Yu, Deputy District Attorney, Juvenile Division, and Cynthia Gamboa, Supervising Probation Officer of the RISE Court, among others. In November 2018, the staff of the RISE Court were even given a tour of The Refuge and the opportunity to ask questions about the program. At the end of this two-hour tour and meeting, the RISE Court asked us if they could reserve all the beds, with one staff member commenting that it was the best program they had ever seen for Probation youth. But all of the above people keep asking why we haven’t been able to get our license.

Thus, I am asking you to confirm CDSS’s position within two weeks—by September 6. It is important that we get confirmation whether our objections to the transportation requirements will be a deal-breaker, or whether we will be able to get a license. Since we are spending \$15,000 a month just waiting, we need to decide whether to continue with the process of trying to get licensed, or whether we should simply turn The Refuge into a home for adult women.

I look forward to hearing from CDSS with clarification about the above, and confirmation that either we will be able to get a license, or that our religious objections to the transportation requirements will prevent us from getting one.

Sincerely,

Grace Williams, CIH President & Executive Director

619.431.5537 • [childrenoftheimmaculateheart@gmail.com](mailto:childrenoftheimmaculateheart@gmail.com)  
[www.childrenoftheimmaculateheart.org](http://www.childrenoftheimmaculateheart.org)



**Children of the Immaculate Heart**

P.O. Box 13954  
San Diego, CA 92170

September 12, 2019

**Via E-Mail & U.S. Mail:**

Ms. Stacie Kinney  
Policy Analyst  
Cal. Department of Social Services  
Continuum of Care Reform Branch  
744 P Street  
Sacramento, CA 95814  
[Stacie.Kinney@dss.ca.gov](mailto:Stacie.Kinney@dss.ca.gov)

Ms. Carol Anderson  
Licensing Program Analyst  
Cal. Department of Social Services  
Community Care Licensing Division  
7575 Metropolitan Drive #110  
San Diego, CA 92108  
[Carol.Anderson@dss.ca.gov](mailto:Carol.Anderson@dss.ca.gov)

**Re: License for Short-Term Residential Therapeutic Program (STRTP)**  
**Facility Name: The Refuge**  
**Facility No.: 374603969**

Dear Ms. Kinney and Ms. Anderson:

I am writing to follow up regarding my letter dated August 22, 2019. As I said in that letter, Children of the Immaculate Heart (CIH) is being placed in an impossible position by the California Department of Social Services (CDSS). CIH is presently spending \$15,000 per month to maintain The Refuge—our proposed Short-Term Residential Therapeutic Program for minors—with no confirmation from CDSS whether a license to house minors will be forthcoming, or whether CDSS will determine that our religious beliefs will be a bar to licensure.

In my letter, I asked CDSS to respond to us by September 6 so that we could decide how best to proceed. In that respect, I was pleased to receive Ms. Kinney's email on August 26 which stated that my letter "has been received and has been elevated to management and a response will be provided shortly." But then September 6 came and went, and we received no response to my August 22 letter.

Nonetheless, I wanted to follow up one last time and give you 10 more days to respond (by Monday, September 23, 2019). If we don't hear from you by then, CIH will have no choice but to assume that our proposed reasonable accommodations will be unacceptable to CDSS, that our religious beliefs will be a bar to licensure, and that continuing this process will be fruitless. The community here in San Diego is eagerly awaiting the use of The Refuge, and I cannot keep telling our supporters that we are continuing to waste \$15,000 a month just waiting to hear from CDSS. I look forward to hearing from you on or before September 23.

Sincerely,

Grace Williams

# **EXHIBIT K**



CDSS

KIM JOHNSON  
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
744 P Street • Sacramento, CA 95814 • [www.cdss.ca.gov](http://www.cdss.ca.gov)



GAVIN NEWSOM  
GOVERNOR

October 2, 2019

Grace Williams  
Children of the Immaculate Heart  
P.O. Box 13954  
San Diego, CA 92170

SUBJECT: The Refuge Facility No.: 374603969

Dear Ms. Williams:

The Department is in receipt of your letter dated September 12, 2019 inquiring about the status of the Department's response to your letter dated August 22, 2019. The Department will provide a response by Friday, October 18, 2019.

Sincerely,

Stacie Kinney  
Policy Analyst  
Continuum of Care Reform Branch  
Children and Family Services Division



STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
744 P Street • Sacramento, CA 95814 • [www.cdss.ca.gov](http://www.cdss.ca.gov)



**KIM JOHNSON**  
DIRECTOR

**GAVIN NEWSOM**  
GOVERNOR

October 17, 2019

Grace Williams  
Children of the Immaculate Heart  
P.O. Box 13954  
San Diego, CA 92170

**SUBJECT:** The Refuge Facility No. 374603969

Dear Ms. Williams:

This is a follow up letter regarding the status of the Department's review of your application to open an STRTP for Commercially Sexually Exploited Children called "The Refuge" as well as the two letters you sent to us dated August 22, 2019 and September 12, 2019. As you may recall, we indicated in our last letter to you dated October 2, 2019 that we would further respond by October 18, 2019.

For the reasons set forth herein, the Department needs additional time to respond to your STRTP application and other communications. The reasons for this are twofold. First, the Department must consult with other parts of the Agency that have a substantial interest in the approval of STRTPs. Additionally, there were many areas of the application that were deficient that warrant the Department's continued review. Although we have made progress in these areas, further work is necessary before we can give you a definitive response. Additionally, some parts of the review process are not within the Department's control. As soon as we know the timeframe for responding to your application and letters in full, we will share that information with you.

Sincerely,

  
Stacie Kinney  
Policy Analyst  
Continuum of Care Reform Branch  
Children and Family Services Division

# **EXHIBIT L**

refuge house

3 messages

Barrett, Mary-Ellen <maryellen.barrett@sdcca.org> Fri, Jun 21, 2019 at 1:15 PM  
To: "Grace Williams (childrenoftheimmaculateheart@gmail.com)" <childrenoftheimmaculateheart@gmail.com>

Grace

Silly question – has the refuge opened yet?

I'm reviewing and updating some research that was done a while ago about the Advisory Council.

Also, has the victim services committee had their elections for chair/vice chair? Will I be seeing your smiling face at future meetings? Fingers crossed.

Thanks,

Mary-Ellen

Children of the Immaculate Heart <childrenoftheimmaculateheart@gmail.com> Tue, Jun 25, 2019 at 5:08 PM  
To: "Barrett, Mary-Ellen" <maryellen.barrett@sdcca.org>

Hi Mary-Ellen!

The Refuge has not opened yet, but last week one of our staff members and I attended the CPOC training on CCR and happened to meet the woman from CCR in Sacramento who is reviewing our application right now! She said she would get back to us in the next one to two weeks, so we think we are close!! She was very positive. Maybe we'll have more news by next month's meeting!

Thanks so much!

Grace

[Quoted text hidden]

--  
President/Executive Director  
Children of the Immaculate Heart  
www.childrenoftheimmaculateheart.org  
www.facebook.com/childrenoftheimmaculate  
(619) 431-5537

Barrett, Mary-Ellen <maryellen.barrett@sdcca.org> Wed, Jun 26, 2019 at 9:27 AM  
To: Children of the Immaculate Heart <childrenoftheimmaculateheart@gmail.com>

Excellent news Grace!

From: Children of the Immaculate Heart <childrenoftheimmaculateheart@gmail.com>  
Sent: Tuesday, June 25, 2019 5:09 PM  
To: Barrett, Mary-Ellen <maryellen.barrett@sdcca.org>  
Subject: Re: refuge house

[Quoted text hidden]

**EXTERNAL SENDER - CAUTION:** This email was sent from outside the San Diego County District Attorney's Email System. Please do not click on any links or open attachments unless you recognize the sender and know the content is safe.

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12

13

# **EXHIBIT M**

---

**licensing update**

2 messages

Yu, Fanny &lt;Fanny.Yu@sdcda.org&gt;

Tue, Jul 16, 2019 at 4:20 PM

To: "childrenoftheimmaculateheart@gmail.com" &lt;childrenoftheimmaculateheart@gmail.com&gt;

Hi Grace,

I hope you are doing well. On behalf of RISE court I wanted to get an update from you regarding licensing or contract application with the county. We're all hoping that The Refuge becomes available for our RISE youth end of the year or beginning of next year.

Thanks,  
Fanny

Fanny Yu

Deputy District Attorney, Juvenile Division

San Diego County District Attorney's Office

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Children of the Immaculate Heart <childrenoftheimmaculateheart@gmail.com>

Wed, Jul 17, 2019 at 10:33 AM

To: "Yu, Fanny" &lt;Fanny.Yu@sdcda.org&gt;

Dear Fanny,

Thank you so much for reaching out! We have a meeting this afternoon with CCL here in San Diego that includes a conference call to Sacramento. We will let you know how it goes! Thank you so much for your support on this long road!

We hope to be at your service soon!

Sincerely,

Grace Williams  
[Quoted text hidden]

—  
President/Executive Director  
Children of the Immaculate Heart  
[www.childrenoftheimmaculateheart.org](http://www.childrenoftheimmaculateheart.org)  
[www.facebook.com/childrenoftheimmaculate](https://www.facebook.com/childrenoftheimmaculate)  
(619) 431-5537

# **EXHIBIT N**

**Beds**

5 messages

**Gamboa, Cynthia M.** <Cynthia.Gamboa@sdcounty.ca.gov> Fri, Aug 23, 2019 at 4:29 PM  
To: "Grace Williams (childrenoftheimmaculateheart@gmail.com)" <childrenoftheimmaculateheart@gmail.com>

Hi Grace,

Just checking the status of your home?? Wanted to see if you have heard anything yet? Thanks!

Cynthia Gamboa  
RISE Court

Supervisor

**Children of the Immaculate Heart** <childrenoftheimmaculateheart@gmail.com> Fri, Aug 23, 2019 at 4:34 PM  
To: "Gamboa, Cynthia M." <Cynthia.Gamboa@sdcounty.ca.gov>

Hi Cynthia!

Thanks for your email. We haven't heard anything for a few weeks. CCR raised some objections to us being a religious organization, so we are working with them on that right now. We have assured them that we have no religious requirements and that we serve everyone/anyone regardless of their background, but they are still giving us a bit of a hard time. It is sad, because these kids need help so much and now it is being slowed down because of this. Hopefully it will all be worked out soon!

I really appreciate your interest! We can't wait to be able to be of service to you!

Sincerely,

Grace Williams  
[Quoted text hidden]

—  
President/Executive Director  
Children of the Immaculate Heart  
[www.childrenoftheimmaculateheart.org](http://www.childrenoftheimmaculateheart.org)  
[www.facebook.com/childrenoftheimmaculate](https://www.facebook.com/childrenoftheimmaculate)  
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**Gamboa, Cynthia M.** <Cynthia.Gamboa@sdcounty.ca.gov> Fri, Aug 23, 2019 at 4:41 PM  
To: Children of the Immaculate Heart <childrenoftheimmaculateheart@gmail.com>

Thank you Grace for the update. I have let my boss know how much we need your program. I will continue to push it on my end to see if there is anything that can be done to speed up the process. Have a good weekend.

Cynthia

# **EXHIBIT 0**

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**minor home opening soon?**

2 messages

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**Ginger Shaw** <ginger.shaw@yahoo.com>

Mon, Nov 11, 2019 at 4:04 PM

Reply-To: Ginger Shaw <ginger.shaw@yahoo.com>

To: Grace Williams <childrenoftheimmaculateheart@gmail.com>

Grace,

Alma Tucker International Network of Hearts will be presenting at US State Dept this week and wanted to know if there is any housing for minors in SD. Are you close to opening?

Ginger

Ginger Shaw, Executive Director

California Against Slavery

ginger.shaw@yahoo.com

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**Children of the Immaculate Heart** <childrenoftheimmaculateheart@gmail.com>

Sat, Nov 16, 2019 at 2:26 PM

To: Ginger Shaw <ginger.shaw@yahoo.com>

Hi Ginger,

The CDSS began to give us trouble about being a religious organization, despite the fact that we have no religious requirements for our clients, back in July and we are still dealing with that. However, Hidden Treasure's STRTP, Tiffany's Place, got licensed about months ago, so they should be opening soon!

God bless you!

Grace

[Quoted text hidden]

President/Executive Director

Children of the Immaculate Heart

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