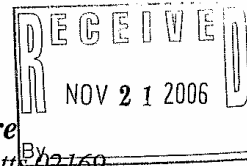


*The Commonwealth of Massachusetts*  
*Department of Early Education and Care*  
1250 Hancock Street Suite 120-S, Quincy, Massachusetts 02169



November 20, 2006

Judge Rotenberg Center  
240 Turnpike Street  
Canton, MA 02021

Re: Complaint # 45560

Dear Dr. Israel,

Enclosed is the report resulting from an investigation conducted by the Department of Early Education and Care. The investigation was conducted in response to a report that had been filed with the Department of Early Education and Care.

The investigation resulted in no non-compliances being cited. The investigation report is attached for further reference.

Thank you for your cooperation.

Respectfully,

A handwritten signature in cursive script that reads "Kerry Murphy McCall".

Kerry Murphy McCall  
Residential and Placement Licensor

CC: Glenda Crookes, JRC

*The Commonwealth of Massachusetts*  
*Department of Early Education and Care*  
1250 Hancock Street Suite 120-S, Quincy, Massachusetts 02169  
Date: November 20, 2006

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**INVESTIGATION REPORT**

Complaint # : 45560 Facility # : 4904000  
Name of Facility: Judge Rotenberg Center  
Address: 240 Turnpike Street, Canton, MA 02021

**Intake Date:** 06/22/2006

**Report Date:** November 6, 2006

**Facility Description:** Residential program for developmentally delayed and behaviorally disordered children and adolescents.

**Reason for Investigation:** The New York Special Education Department (NYSED) made announced and unannounced visits to JRC. NYSED issued a report that included the following possible MA regulatory issues:

1. behavioral programming is not sufficiently monitored by appropriate professionals and in many cases the background and preparation of staff is not sufficient to oversee the intensive treatment
2. the privacy and dignity of students is compromised (cameras in the bathroom)
3. the collateral effects (increased fear, anxiety, and aggression) from JRC's punishment model are not adequately assessed, monitored, or addressed
4. students are forced to exhibit target behaviors so aversive behavioral interventions can be used (behavioral rehearsal lesson)
5. no evidence of social skills instruction; no natural social interaction; staff stated it is "unsafe to allow students to socialize because in the past students had plotted against staff"
6. consequences are applied after a delayed period of time
7. students who "plead" to their psychologist or clinician are consequence
8. some staff are not trained to administer the GED

**Investigation Activities:** These possible regulatory issues were investigated during the provisional licensing review visits. These visits included records review, staff and resident interviews, inspection of the facilities, and observation.

**Determinations:** EEC chooses to not make a determination at this time, as many of these issues need further monitoring. This monitoring will occur during the second provisional licensing period.

**Investigation Findings:**

- Staff orientation and training was cited as part of the first provisional licensing review. It was difficult to determine if staff were receiving appropriate orientation and training. Staff must be trained in the implementation of each treatment plan as they are so individualized and elaborate. Documentation of the training must be maintained in each personnel record.
- While there are cameras throughout the programs, JRC has verbally assured EEC that there are no cameras in bathrooms except for one in the school. JRC has verbally assured EEC that this bathroom is only used when absolutely necessary.
- The current behavior management system at JRC requires that most rewarding interactions with peers and adults must be earned or purchased. It is unclear at this time if there is adequate social interaction. This will be monitored during the second provisional licensing period.
- Regulatory issues that are part of the NYSED report will be addressed during the second provisional licensing period.

**Non-compliances:** None at this time; regulatory concerns were cited in the provisional licensing visit narrative and statement of non-compliance.

**Licensors**

**Kerry Murphy McCall**