

Dear Members of Congress and Elected Officials,

We, the undersigned organizations, call upon you in this time of global health crisis, to take immediate measures to address the welfare of children and youth<sup>1</sup> held in Private Youth Programs across the US and abroad, to ensure adherence to the Federal and Statewide mandates to prevent the spread of COVID-19.

*Our collective experience with these programs, as survivors of institutional abuse, youth advocates and allies, underscores our grave concern for the safety of American children currently held in these facilities.*

In response to the COVID-19 pandemic, The United States of America has undertaken health and safety practices by implementing immediate action to mitigate the spread of COVID-19. One of these key measures was the closures of all schools and the prevention of large gatherings. Despite orders from a majority of the United States' Government and Health Advisory Boards to close all non essential businesses, reports indicate that multiple Residential Private Youth Programs are [“Still enrolling students during the COVID-19 Outbreak”](#), and continuing to operate in overpopulated conditions, with limited medical care available. Also of concern are the enrollment processes for some of these programs that require the use of [Escort Companies](#) to forcibly remove children and youth from their homes and transport them across state lines, ignoring non-essential travel bans and crossing closed borders.

The [Private Youth Programs](#) we refer to include, but are not limited to: Residential Treatment Centers tailored toward at-risk youth, Therapeutic Boarding Schools (inc. Religious Academies), Wilderness Programs and Boot Camps collectively known as the [Troubled Teen Industry \(TTI\)](#).

***We ask you to act immediately to protect youth held in Private Youth Programs from the nationwide threat of COVID-19.***

With Private Youth Programs challenging Government and Health and Safety recommendations by continuing to operate despite the active threat of COVID-19, **the time is now** to act on behalf of America's children and youth. This vulnerable population of marginalized youth urgently need your attention as many of these programs currently operate with little to no oversight. In these times of national crisis, it is imperative that we put a spotlight on this largely unregulated industry with [a long history of abuse, neglect and malpractice](#).

We ask for immediate state level actions to ensure that detained youth's rights and health are protected and to mandate a national standard of care during pandemic or natural disasters. We advocate for permanent reforms, specifically, proper regulation of this industry for safe and evidence-based care for children and youth.

Given the controversial nature of these residential programs, COVID-19 poses a serious threat to public health. *We respectfully request that you undertake immediate, and decisive action to prevent further risk to public health and safety.* As a collective, we are asking for your swift action and reassurance that the young people held in these programs are not forgotten during, and post pandemic.

**To ensure the Health and Safety of children and youth, urgent state level steps are needed:**

1. Mandate the closure of all non-essential Private Youth Programs during the threat of the COVID-19 outbreak.

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<sup>1</sup> For purposes of clarification, the term youth is in reference to school-age children and teens.

2. Ensure that all remaining Private Youth Programs are immediately inspected and proven to be providing evidence-based, humane and rights-affirming measures to protect the health and wellbeing of youth who are admitted into and currently live in these residential facilities. Ensuring that youth are afforded **immediate** medical care access under the care of properly qualified, licensed physicians.
3. Create a plan of action to safely release all youth currently held in Private Youth Programs (that do not prove to pose a danger to themselves or others), to their legal guardian(s) as soon as possible and for no less than 60 days. Highlighting that there are currently children placed out of state and [abroad](#), we need a plan to retrieve them safely, and in coordination with US embassies. Evaluations must be made to ensure youth are placed in an environment that is best suited for their physical and emotional wellbeing.
4. Cessation of all new intakes including ceasing the use of [Escort Companies](#), in transportation across state lines unless it is to return children to their legal guardian(s).
5. Creation of a task force to immediately evaluate these facilities, one by one, to determine if they should be recommended for closure based on the measures deemed necessary by their official state health and safety guidelines. **If the institutions do not comply in meeting [oversight standards](#), we are advocating for their permanent closure.**

### **Private Youth Programs and COVID-19**

As of today, The Troubled Teen Industry has no federal oversight. Only a patchwork of state regulations exists to reign in this billion-dollar industry. Even in states with comprehensive laws, many of these programs continue to operate without licensing, and those who are licensed, still fail to comply with their state's most basic regulations. This culture of hiding in plain sight has led to multiple allegations of physical abuse, arrests, and lawsuits claiming abuse, neglect, wrongful death and sexual abuse.

In these times our concern grows as we know that The COVID-19 VIRUS thrives in environments of crowded living spaces, engaging in group congregations, and refusing adequate access to maintain hygiene. Conditions within these facilities would make it difficult to be compliant with state and government executive orders and procedures to prevent the spread of COVID-19.

The locations of these facilities are a **major** concern, with potential to be problematic. Some of these programs are located in rural communities, and take kids out on long wilderness treks, far from health care professionals and hospitals. In the event that emergency services are necessary, it could take a significant amount of time to get these young people the medical treatment they need.

It is our collective experience that these programs are known to utilize inhumane procedures such as solitary confinement, strip searches and restraints on a daily basis. Historically, there have been [several deaths](#) in Private Youth Programs due to inadequate medical attention and failure to provide emergency services/ modern medicine. *All of which leads us to be concerned with how these facilities may be handling the current pandemic threat.*

Moreover, many of the youth who are forced into these facilities, against their will are sent for reasons that do not justify involuntary commitment and can often be sent for conversion therapy of their sexual orientation, to prevent Child Protection

Service investigations or for simply not agreeing with their parents' religion. These children are not criminals and are rarely considered mentally ill, and if they were, these programs wouldn't be equipped to provide that type of care.

Some children and youth who enter these programs enter with a disability, for those who do not have a disability, the majority will leave with a disability, via physical or psychological injury. These disabilities are incurable and lifelong. This is what is referred to in our field as 'trauma induced disabilities'. The impact of childhood trauma across the lifespan affects hundreds of millions of people across the globe. Its huge personal social and economic cost is largely unquantified.

The Americans with Disabilities Act (ADA) defines a person with a disability as a person who has a physical or mental impairment that substantially limits one or more major life activity. This includes people who have a record of such an impairment, even if they do not currently have a disability. It also includes individuals who do not have a disability but are regarded as having a disability. The ADA also makes it unlawful to discriminate against a person based on that person's association with a person with a disability.

According to the [GAO's Report](#) on "Concerns Regarding Abuse and Death in Certain Programs for Troubled Youth", children that are placed in these facilities are already at risk for trauma, injury or death because of the lack of state and federal oversight. With the active COVID-19 threat, this has now escalated to an extremely dangerous environment for the youth detained in these facilities.

### **Residential Youth Facilities are the ideal breeding ground for COVID-19**

Without immediate and bold action, Residential Private Youth Programs could easily become the next epicenter for the broad community spread of COVID-19. Within these facilities, social distancing is nearly impossible or medical services scarce. As it is, countless young people in the care of these facilities do not have access to medical personnel nor have the freewill to alert their guardians, family members or any outside source if they are hurt, sick or being abused.

It is vital for the youth in these facilities to have access to abuse hotlines, mandated reporters and independent, impartial, psychologists as soon as possible to document any incidents that may be occurring in these facilities. We advocate for youth to have unmonitored phone calls and visits in order to be able to speak freely with their families/ guardian(s) and communities without fear of reprisal.

### **Heightened risk of exposure and death from COVID-19**

Much like residents of elder-care homes as well as adult and juvenile inmates who contract COVID-19, the young people in these facilities are much more vulnerable to severe complications than those living free in the community. ***The health of residential facility staff is directly tied to the health of the youth in their care.*** There is no line, thin or otherwise, between the health of children and the health of the staff at these facilities. The inevitable closeness and sustained contact between the staff and residents, creates an environment ripe for epidemic in these facilities that will extend to the youth, staff, their families as well as the community at large.

There must be adequate regulation in place to ensure that Private Youth Programs employ qualified, licensed physicians, are providing proper medical care and that this care includes preventive care, medical testing, and prompt treatment — including necessary transfers to emergency services for any symptoms of COVID-19.

Residential programs for children and youth, tend to be located in rural areas across the US as well as remote foreign countries. These settings leave this vulnerable population without reliable, nearby access to medical centers or hospitals. It is even more pressing that we ensure that young people who are sent from the US to foreign countries (i.e. Costa Rica, Mexico,

etc.) have access to proper medical care. However, considering the risks and the lack of authority to institute any health and safety measures outside of the US, we advocate for the return of all youth placed outside the US and a **ban on youth placements in foreign countries.**

### **Education on COVID-19 Prevention**

Residential Private Youth Programs must be properly versed and educated about the virus and the measures they are obligated to take in minimizing risk of contracting or spreading the COVID-19 virus. Examples include, but are not limited to, the importance of proper hand washing, use of protective face masks and gloves, and social distancing. Likewise, staff must also be educated about the virus to take adequate measures to protect themselves and their families, as well as their communities.

- **Sanitation:** All facilities must develop and announce a plan to disinfect and regularly sanitize the facilities, particularly any common touch surface areas. The most basic aspect of infection control is hygiene. There must be free and ready access to warm water, soap, hand sanitizer and cleaning supplies for all youth.

- **Prevention:** All facilities must provide both staff and youth with medical grade face masks, gloves and proper barriers between non-essential staff and youth to prevent exposure.

- **Testing:** All facilities must dedicate a licensed and trained medical staff to administer COVID-19 Testing and to take precautions to ensure that new enrollees are given adequate time to show symptoms or ensure wellness before introduced to the general population. However, understanding the nature of solitary confinement, we encourage the use of a safe, interactive and least restrictive use of quarantine. ***Highlighting that the right to live without fear of reprisal is fundamental to the dignity and respect, every citizen is owed in a free and democratic society.***

As the economy opens back up and we are faced with the continued efforts to prevent further spread of the COVID-19 Virus, these facilities will need an updated and ongoing plan of action to continue operating. There must be a plan for how necessary functions and services will continue, and a contingency plan, if large numbers of staff and students have contracted the virus. Many tasks in these facilities, such as food preparation and basic sanitation, property or animal maintenance and more are performed by the youth alone. The plan must also address how necessary tasks will continue, and how they will take precautions to ensure the health and safety of the children performing such tasks.

### **Make public all plans for managing COVID-19 in Private Youth Programs**

**Transparency** — Which engenders public trust and collaboration — has proven critical to combatting COVID-19 around the world. Given the high stakes, each of your offices must make transparent it's plans to address COVID-19 in Residential Private Youth Programs.

**Data collection** — As with any contagious disease, data collection is critical to understanding and fighting the virus. Residential Private Youth Programs must be part of this process. The same information that is tracked in the community must be tracked in these facilities as well. There must be a full accounting of infection numbers and deaths federally, state by state and in each facility. A database should be made available to the public for more information about these programs to be made transparent so that parents can make informed decisions, which goes hand in hand with *informed consent*, when choosing care for their children.

### **We advocate for an immediate response to safeguard our most vulnerable children.**

As you know, this virus knows no barriers between cities, counties or judicial districts, or even between the incarcerated and free populations. This virus warrants a nation-wide, consistent response in order to protect children and youth in these facilities.

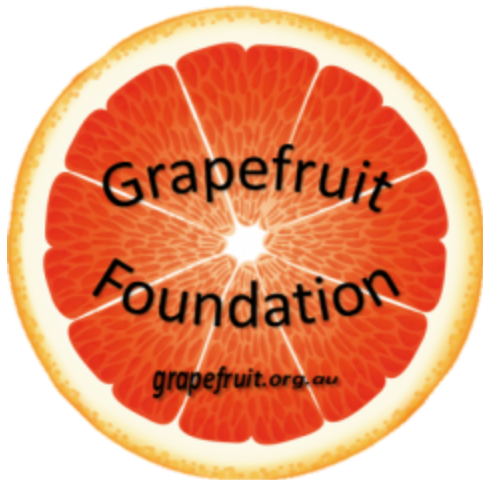
We recognize the enormous pressure federal and state officials are facing to address the current challenges of this growing public health crisis. We offer these urgent recommendations to assist in your development of an action plan to prevent the spread of COVID-19 in Private Youth Programs. We are ready, willing and able to collaborate on legislative efforts that prioritize the health and safety of all youth held in Private Youth Programs in the US and abroad.

As a collective, we ask for your help in advocating for the basic human rights of at-risk youth held in Private Youth Programs. This pandemic has challenged us in ways never imagined. In the days and months ahead, our future, our very fate, lay in how we, as a nation, navigate these uncharted waters. Now, more than ever, these children need our voices to speak for their rights, safety and well being. We intend to be that voice and we ask that you use your voice to speak for them now.

**In Solidarity,**







If you have any questions or would like to get involved please contact our coalition team:  
[troubledprograms@gmail.com](mailto:troubledprograms@gmail.com)

#### Advocate Organizations

- [NYRA](#) (5,000 Supporters)
- [CAFETY](#) (818 Supporters)
- [WWASP Survivors](#) (3,579 Supporters)
- [The Freedom Village Experience](#), (500 Supporters)
- [#breakingcodesilence](#) (605 Supporters)

- [Suburbia's Dirty Little Secret](#) (1,849 Supporters)
- [SafeTeenSchools](#) (260 Supporters)
- [Pacer Consulting](#)
- [The Troubled Podcast](#)
- [The National Center For Lesbian Rights](#)
- [Born Perfect](#) (1,734 Supporters)
- [Bethel Documentary Group](#) (850 Supporters)
- [Integrity USA](#) (5,248 Supporters)
- [Wayne Besen Show](#) (1.58k Subscribers)
- [Truth Wins Out](#) (7,800 Supporters)

### **Survivor Community Groups**

[WWASP Survivors Support Group](#) . [Survivors United](#) . [Straight Incorporated Yearbook](#) . [Wilderness Survivors](#) . [Mosaic Down Syndrome World](#) . [Special Needs Publications](#) . [SW Investigations, LLC](#) . [P.I.S.S.E.D. \(People Improving Special needs Services and Education\)](#) . [WWASP Fighters](#) . [Survivors of Teen/Adult Wilderness Boot Camp Programs](#) . [Straight Incorporated Yearbook](#) . [Troubled Teen Supergroup](#) . [Stand Up Against Institutional Child Abuse](#) . [Survivors of Institutional Abuse](#) . [Elan School Documentary](#) . [Stop WWASP](#) . [Reddit Troubled Teens](#) . [Cross Creek Survivors](#) .

### **Reference Articles & Reports on Troubled Teen Industry**

- *Transcript U.S. House of Representatives Committee on Education and Labor: [CHILD ABUSE AND DECEPTIVE MARKETING BY RESIDENTIAL PROGRAMS FOR TEENS](#)*
- *National Youth Rights on the TTI: [The "Troubled Teen" Industry](#)*
- *Mother Jones report on the TTI: [The Cult That Spawned the Tough-Love Teen Industry](#)*
- *Huffpost report on TTI: [Stop Child Abuse in Programs that Supposedly "Help"](#)*
- *NATSAP Research study: [\(PDF\) Young, M. & Gass, M. \(2010\). Preliminary data from the NATSAP Research Database: Client characteristics at admission. Journal of Therapeutic Schools and Programs. 4 \(1\), 80-105.](#)*
- *CSPAN report on TTI: [Child Abuse at Private Facilities](#)*
- *[American Journal of Orthopsychiatry, 76 \(3\), 295-303 Running Head: UNLICENSED RESIDENTIAL PROGRAMS](#)*
- *[The Harrowing Story of Life Inside Alabama's Most Sadistic Christian Bootcamp](#)*
- *[The Troubled-Teen Industry Has Been A Disaster For Decades. It's Still Not Fixed.](#)*
- *[The Myth Of Tough Love](#)*
- *The Aaron Bacon Story: [Death in the Desert](#)*
- *[Long Term Residential Mental Health Institutionalization of Teens Does More Harm Than Good](#)*
- *[Death Trip - Consumer HealthDay](#)*

## **Detention Center COVID-19 Outbreaks**

- [COVID-19 in Juvenile Facilities - The Sentencing Project - Petition](#)
- [Juvenile Justice Centers And Vulnerable Youth Latest Victims Of COVID-19](#)
- [Death of juvenile in California from coronavirus believed to be first in US of someone that age](#)
- [COVID Staff Death Rocks Juvenile Center For Virus-Free Youth](#)
- [Coronavirus: 42 NY nursing homes have at least 10 COVID-19 deaths. See the data here.](#)
- [Coronavirus in juvenile detention is a 'nightmare scenario,' doctors and advocates say](#)
- [State confirms 6th COVID-19 death; Anchorage juvenile justice center employee among new cases](#)
- [Youths Face Coronavirus in Juvenile Detention](#)
- [Coronavirus and children in detention](#)
- ['There was no control,' says Bridge City youth prison guard about riot](#)

## **Survivor Stories in Private Youth Programs**

- [Parents, Shopping for Discipline, Turn to Harsh Programs Abroad](#)
- [Does science support the "wilderness" in wilderness therapy?](#)
- ['I went into the woods a teenage drug addict and came out sober. Was it worth it?'](#)
- [Boy came back 'ill-equipped for adult life'](#)
- [Captivity By the Sea - WWASPSurvivors.com](#)

## **Reports on Unregulated Practices**

- [Unlicensed Residential Programs: The Next Challenge in Protecting Youth](#)
- [Schiff reintroduces bill to regulate 'troubled teen' industry](#)
- [When Wilderness Boot Camps Take Tough Love Too Far](#)
- [Teen boy who escaped from wilderness program for troubled youth found](#)
- [Camps for troubled kids can be magnets for abuse](#)

## **Religious Facilities**

- [How Christian Reform Schools Get Away with Brutal Child Abuse](#)
- [The church that won't close its doors over the coronavirus](#)
- [Pastor refuses to shut down church services amid COVID-19](#)