Joint Testimony of James Ellison and Bilal Hasan

Before

The Pennsylvania House Republican Policy Committee

Hearing on Protecting Vulnerable Youth: Accountability in Emergency Placement Decisions

(November 9, 2026)

Good morning Committee members. Our names are James Ellison and Bilal Hasan, and together, we own BCL Partners, LLC d/b/a Leading Youth For Excellence—or "L.Y.F.E." for short. Until recently, L.Y.F.E. was a service provider within the Pennsylvania child welfare system. Specifically, L.Y.F.E. operated a trauma-informed care residential youth shelter in Steelton, Dauphin County, Pennsylvania, under a license issued by the Pennsylvania Department of Human Services. The license authorized L.Y.F.E. to provide community-based, residential services for dependent and delinquent children. As a DHS-licensed facility, L.Y.F.E. was subject to oversight by the Office of Children, Youth & Families or "OCYF." Laval Miller-Wilson leads OCYF and its approximately 700 employees, while Gabrielle "Gabi" Williams supervises one of the four regions of OCYF.

For nearly two and a half years, L.Y.F.E. operated without incident, providing a valuable resource to vulnerable youth in Dauphin County and across the Commonwealth of Pennsylvania. In February of 2026, however, L.Y.F.E. became the latest victim to the arbitrary and capricious decision making by the unelected bureaucrats when OCYF, without any prior warning, revoked L.Y.F.E.'s license and ordered the immediate removal of all students. Meanwhile, OCYF delayed approving L.Y.F.E.'s budget for the 2025-2026 fiscal year—which is a condition precedent for County Children and Youth Agencies ("CCYAs") remitting payment to L.Y.F.E. for its services—for over a year, resulting in L.Y.F.E. being deprived of nearly $2.8 million. We believe that the actions of OCYF were part of a coordinated campaign by Deputy Secretary Miller-Wilson to harm L.Y.F.E. and starve it of the necessary funds to prosecute its appeal of OCYF's pretextual revocation of L.Y.F.E.'s license.

But the real victims in this story are the youth that L.Y.F.E. served. Because of OCYF's improper actions, 25 children were removed from L.Y.F.E. basically overnight and scattered across the Commonwealth. At least three of those students were sex trafficked shortly thereafter. Another student, who previously spent time at L.Y.F.E. but was unable to be placed there again due to the closure, was shot and paralyzed within weeks of the closure. And there are the countless youth who were never given the opportunity to seek safe shelter at L.Y.F.E. due to Deputy Secretary Miller-Wilson's actions and suffered resultant harm. In light of these tragedies, all of which can be traced back to Deputy Secretary Miller-Wilson's misconduct, OCYF still has the audacity to include the domain name www.KeepKidsSafe.pa.gov on its letterhead. In reality, Deputy Secretary Miller-Wilson simply views youth shelter's like L.Y.F.E. as weigh stations that moves freight from one location to another. Such contempt for youth is antithetical to OCYF's mission.

Of course, L.Y.F.E. is just the latest provider to fall victim to the arbitrary and capricious decision making of Deputy Secretary Miller-Wilson and the other unelected bureaucrats at OCYF. We are here to tell our story and hope it serves as a call to action to adopt the regulatory reform that providers so desperately need.

The Child Welfare System in Pennsylvania is Administered Through 67 County Children and Youth Agencies Under the Supervision of OCYF

Before getting into the details about L.Y.F.E., it is important to provide some background information on the child welfare system in Pennsylvania. The system is administered through 67 County Children and Youth Agencies or "CCYAs" under the supervision of the Commonwealth of Pennsylvania through OCYF, which is a division of DHS. OCYF views its mission as supporting the provision of quality services and best practices designed to ensure the safety, permanency, and well-being of the Commonwealth's children, youth, and families. OCYF provides regulatory guidance, oversight, and support for the operation of Pennsylvania's CCYAs and private providers who offer direct services to children and families. These services include child abuse prevention and treatment, in-home family support and preservation services, foster care, services to support older youth transitioning to adulthood, and adoption.

OCYF has four regional offices across Pennsylvania: (1) the Philadelphia office, which serves the "Southeast Region" (Berks, Bucks, Chester, Delaware, Montgomery, and Philadelphia Counties); (2) the Pittsburgh; office, which serves the "Western Region" (Allegheny, Armstrong, Beaver, Butler, Cameron, Clarion, Clearfield, Crawford, Elk, Erie, Fayette, Forest, Greene, Indiana, Jefferson, Lawrence, McKean, Mercer, Potter, Venango, Warren, Washington, and Westmoreland Counties); (3) the Scranton offices, which serves the "Northeast Region" (Bradford, Carbon, Lackawanna, Lehigh, Luzerne, Monroe, Northampton, Pike, Schuylkill, Sullivan, Susquehanna, Tioga, Wayne, and Wyoming Counties); and (4) the Harrisburg office, which serves the "Central Region" (Adams, Bedford, Blair, Cambria, Centre, Clinton, Columbia, Cumberland, Dauphin, Franklin, Fulton, Huntingdon, Juniata, Lancaster, Lebanon, Lycoming, Mifflin, Montour, Northumberland, Perry, Snyder, Somerset, Union, and York Counties). Regional office responsibilities include monitoring, licensing, and providing technical assistance to residential treatment facilities. Director Williams is the Director of the Central Region of OCYF. Director Williams and the rest of her licensing team assigned to L.Y.F.E. are all Caucasian.

L.Y.F.E., as a DHS-Licensed Youth Shelter, Operated Under the Supervision of OCYF

Located in Steelton, Pennsylvania, L.Y.F.E. operates from the former Schaffner Youth Center (the "Center") owned by Dauphin County. Both of L.Y.F.E.'s owners are African American. From June 5, 2022 to March 2, 2026, L.Y.F.E. provided trauma-informed care residential shelter services to a student population compromised predominantly of children of color pursuant to a license issued by DHS authorizing the provision of community-based residential services for dependent and delinquent children (License No. 338170).

L.Y.F.E. was designed to specifically service children who were designated "high risk" because they presented with significant behavioral issues and disorders which resulted from physical, emotional and or/sexual traumas suffered during varying periods of their lives. Because these traumatic experiences often manifested themselves in periods of heightened behavioral disturbances which presented a risk of harm to the children and/or third parties with whom they came into contact, most youth shelters across the country would either refuse to accept placement for these children or discharge them from placement when their behaviors became unmanageable. L.Y.F.E. was formed precisely to service these "high risk" children and see to their needs by accounting for their traumas and resulting behaviors and addressing them by providing trauma informed care services. Those services included onsite counseling and therapy, as well as psychological and psychiatric support services including psychological evaluations and treatment plans and psychiatric medication management services. L.Y.F.E. provided these services at no cost to taxpayers. In other words, L.Y.F.E. provided these enhanced services for free.

Because many of the children that L.Y.F.E. cared for suffered from trauma-induced issues, L.Y.F.E. employed a team of managers, direct care staff workers, therapists, nurses/medical technicians, social workers, and contracted medical, psychiatric, and mental health professionals to provide daily child and therapeutic care to residents. L.Y.F.E. employed 45 full-time and part-time staff immediately prior to February 25, 2026. The majority of L.Y.F.E.'s staff was African American. The Center has a maximum capacity of 48 children. L.Y.F.E. housed 25 children at the Center ranging from ages 14 to 19 immediately prior to February 25, 2026. Of the 25 children, at least 70% were children of color.

While L.Y.F.E. admittedly experienced some challenges when it first opened its doors in 2022, L.Y.F.E. demonstrated rapid improvement in its compliance with the applicable statutes, ordinances, and regulations. For instance, during its first license renewal inspection of L.Y.F.E. in March of 2023, OCYF noted over 141 "areas of noncompliance." Areas of noncompliance refer to regulatory violations—both large and small—found during annual inspections. These violations are documented on a Licensing Inspection Summary and require an approved Plan of Correction. Notwithstanding the large number of violations, OCYF renewed L.Y.F.E.'s license in full on June 5, 2023 without any restrictions or oversight conditions.

During its initial year of operation, L.Y.F.E. exclusively serviced children placed by Dauphin County Children, Youth and Family Services and the Dauphin County Juvenile Probation Department pursuant to orders issued by the Dauphin County Court of Common Pleas, many of whom presented with significant trauma induced behaviors. These behaviors oftentimes resulted in residents engaging in acts of self-harm, physical assaults against other residents and/or facility staff, physical destruction of facility property/vandalism, and periodic absconding from the facility. To remedy these issues, L.Y.F.E. implemented common sense measures to ameliorate said behaviors to enhance student safety and security, such as limiting student movements in hallways and between residential pods to decrease opportunities for student assaults and employing the use of Safe Crisis Management (SCM) restraints to prevent planned student assaults; employing SCM restraints to prevent physical destruction of facility property/vandalism and activating fire alarms; and securing exit doors to ensure that students could not abscond from the facility given its semi-remote location and close proximity to wildlife.

Unfortunately, Director Williams and other OCYF representatives thwarted L.Y.F.E.'s safety measures by commencing several Child Protective Services ("CPS") investigations into L.Y.F.E.'s use of SCM restraints and insisting that residents were both free to abscond from the facility at will and free to roam the hallways and enter multiple residential pods even if staff were aware that the residents were doing so to physically assault other residents. Moreover, OCYF told L.Y.F.E. that even if residents were engaged in wanton destruction and vandalism in the facility, L.Y.F.E. staff could not employ SCM restraints to stop them no matter what level of destruction/vandalism the residents engaged; staff's only option was to attempt verbal deescalation until the residents stopped on their own accord. OCYF also instructed L.Y.F.E that it could not preemptively employ SCM restraints to prevent residents from assaulting other residents even if staff knew the assault was about to occur, thus forcing staff to wait until an assault occurred before SCM

restraints could be employed. To make matters worse, OCYF informed residents of the student safety restrictions imposed upon L.Y.F.E. which, unsurprisingly, resulted in an increase of resident absconding attempts, resident assaults, and physical facility damages/vandalism.

To address these issues, on July 30, 2023, nearly two months after its license was renewed for a full year, L.Y.F.E submitted a written request to meet with Director Williams and OCYF representatives following a particularly egregious episode of vandalism by residents that staff were powerless to physically intervene to stop, but were instead forced to standby and simply attempt to talk residents out of doing the damage they were set upon doing. A copy of the written request along with pictures of the facility damages are attached as **Appendix A**. Almost two weeks later, on August 10, 2023, Director Williams and her team convened a meeting with L.Y.F.E., during which L.Y.F.E. laid out in detail how the imposed restrictions were negatively affecting operations. Director Williams advised that the restrictions would remain in place and that L.Y.F.E. should consider not taking Dauphin County children given her staff's prior familiarity with many of the residents at other shelter facilities and their opinion that Dauphin County children were not appropriate for shelter care. L.Y.F.E. pushed back and advised that Dauphin County had nowhere else to place these children and L.Y.F.E was their only option. Director Williams refused to alter her position and advised that any deviation from her instructions would result in departmental citations.

Ten days after L.Y.F.E. refused to comply with Director Williams' request, L.Y.F.E. was issued its first of three provisional licenses. Specifically, on August 21, 2023, Director Williams convened a meeting with the two of us where she offered us an ultimatum: either stop accepting Dauphin County children—the majority of whom were children of color—or be placed on a provisional license. L.Y.F.E. refused to cave in the face of Director Williams' threat as Mr. Ellison specifically informed her that L.Y.F.E. would not abandon its contractual and moral obligations to provide shelter care for vulnerable Dauphin County children.

Upon being placed on a provisional license, OCYF subjected L.Y.F.E. to intensive weekly monitoring. Additionally, whereas L.Y.F.E. was previously subjected to annual OCYF license renewal inspections, it became subject to semi-annual inspections by OCYF following Director Williams' ultimatum.

When OCYF performed its second license renewal inspection of L.Y.F.E. four months later in December of 2023, it noted only 38 areas of noncompliance—an approximately 73% reduction from nine months prior. Despite this dramatic

improvement, OCYF placed L.Y.F.E on a second provisional license. And when OCYF performed its third license renewal inspection of L.Y.F.E. in June of 2024, despite OCYF noting only 5 areas of noncompliance—an over 96% reduction from its first license renewal inspection and an over 86% reduction from its second license renewal inspection—OCYF still placed L.Y.F.E on a third provisional license.

Upon issuing the third provisional license, Director Williams again suggested L.Y.F.E. stop accepting Dauphin County children for placement. L.Y.F.E. once again refused and informed Dauphin County officials of Director Williams' latest threat via a memorandum. A copy of the memorandum is attached hereto as **Appendix B**. L.Y.F.E. also issued a memorandum to Director Williams approximately one month before its next license renewal inspection, memorializing OCYF's conflicting, amorphous, and "evolving" regulatory directives and discussing how they were impacting student safety and facility operations. A copy of the memorandum is attached hereto as **Appendix C**.

While Director Williams never responded to the memorandum, L.Y.F.E. continued its record of compliance while operating within the ever changing framework imposed by Director Williams and OCYF—even when OCYF's guidance had no basis within the Chapter 3800 Regulations governing residential youth shelters like L.Y.F.E. Indeed, during the 18-month period in which L.Y.F.E. was on provisional status, L.Y.F.E. demonstrated such dramatic and sustained improvement in its compliance with the applicable statutes, ordinances, and regulations that DHS restored its full license in February of 2025 after L.Y.F.E's fourth successful license renewal inspection in December 2024. L.Y.F.E. nonetheless voluntarily requested that OCYF continue its weekly monitoring visits to ensure ongoing compliance. Director Williams, however, expressed that weekly monitoring was unnecessary to ensure compliance but ultimately agreed to bi-monthly monitoring sessions by OCYF for the remainder of 2025 to ensure ongoing compliance.

OCYF performed its last license renewal inspection of L.Y.F.E. in November of 2025 and found only twelve areas of noncompliance. At no point did Deputy Secretary Miller-Wilson, Director Williams, or anyone else from OCYF indicate that L.Y.F.E. was operating in a manner that put it at risk of closure.

L.Y.F.E. Submits its 2025-2026 Budget to OCYF for Approval

Meanwhile, and in accordance with OCYF's guidance, L.Y.F.E. submitted its budget for the 2025-2026 fiscal years months earlier, on May 1, 2025. OCYF

approval is a prerequisite for service providers like L.Y.F.E. to get paid for their services because, without OCYF approval, CCYAs are 100% on the hook for any unapproved expenditures. On May 9, 2025, L.Y.F.E. received an email from Jerica Thomas, Budget Analyst for OCYF. The email read: "This email is to advise that your budget submission for FY25/26 has been accepted as complete. It has been added to our internal tracking log, and once assigned to an OCYF reviewer they will contact you with further instructions." Between May 9 and December 10, 2025, L.Y.F.E.'s budget documentation underwent every review imaginable by OCYF—from a preliminary evaluation to multiple quality assurance reviews to what OCYF termed a "pending final review." Yet, by the end of 2025, OCYF still had not approved L.Y.F.E.'s 2025-2026 budget. Upon information and belief, OCYF slow walked approving L.Y.F.E.'s 2025-2026 budget because they had already decided to revoke L.Y.F.E.'s license and wanted to ensure that L.Y.F.E. did not have sufficient funds to challenge the upcoming revocation.

OCYF Revokes L.Y.F.E.'s License and Orders all Children Removed

Given that L.Y.F.E. had maintained its compliance with the applicable statutes, ordinances, and regulations, L.Y.F.E. assumed that OCYF would renew its licensed in 2026. But starting in late January 2026, OCYF appeared to look for reasons to close L.Y.F.E., including issuing citations to L.Y.F.E. for issues that were the direct result of L.Y.F.E's compliance with prior OCYF directives. Upon information and belief, Deputy Secretary Miller-Wilson and Director Williams set a plan into motion to close L.Y.F.E. after February of 2025.

It is believed and therefore averred that plan was formed in the Spring of 2025 when OCYF was forced to restore L.Y.F.E.'s license, in full, over the objections of Deputy Secretary Miller-Wilson and Director Williams. The maximum number of consecutive provisional licenses that a provider can be issued is four, so had L.Y.F.E.'s license not been restored, it would have set the stage for L.Y.F.E.'s closure by issuing a fourth and final consecutive provisional license. But that plan was foiled by L.Y.F.E., and upon information and belief, Deputy Secretary Miller-Wilson and Director Williams were committed not to let that happen again.

On February 25, 2026, OCYF issued two orders to L.Y.F.E. without any prior warning: a license revocation order pursuant to 62 P.S. § 1026(b)(1) and 55 Pa. Code §§ 20.71(a)(1) & -(2)(6) (the "Revocation Order"); and an emergency removal order pursuant to 55 Pa. Code § 20.37 (the "Removal Order.") which directed L.Y.F.E.'s facility to close within FIVE days and all residents to be removed by March 1, 2026. Both orders were signed by Deputy Secretary Miller-Wilson, and upon information

and belief, prepared by Director Williams.

In each Order, Deputy Secretary Miller-Wilson claimed that L.Y.F.E. has "created a setting that constitutes gross incompetence, negligence, and misconduct in operating the facility such that a risk to the life and health of the children in care exists." As support, Deputy Secretary Miller-Wilson asserted that there were "multiple physical site concerns to include unsanitary conditions, missing parts of the ceiling, and obstructed egress that required correcting." But OCYF in the past had recognized that L.Y.F.E. relies on Dauphin County, the owner of the Schaffner Youth Center, to perform structural and major repairs to the Center and informed L.Y.F.E. that its only responsibility was to provide written proof that it reported the repairs to the County. This about-face was particularly troubling because OCYF previously advised L.Y.F.E. that it could not physically restrain residents from performing the vandalism necessitating the repairs in the first place.

Evidently aware that the physical site conditions could not justify the issuance of either Order, Deputy Secretary Miller-Wilson also asserted that "a resident attempted suicide, and the facility failed to report the incidents to the Department." However, video evidence of the incident in question refutes Deputy Secretary Miller-Wilson's contention as it shows that the student did not engage in any self-harm; the student simply hung a sweater over a door. In fact, the student denied any suicidal ideation. Out of an abundance of caution, L.Y.F.E. had the student assessed anyway, and the student was found not to be suicidal.

The Revocation Order similarly mischaracterizes certain events as involving the improper application of force. In one case, L.Y.F.E. staff acted to prevent injury to a resident who had intentionally obstructed a closing steel door, while in the other case, L.Y.F.E. staff acted to reposition a resident who was making active threats to staff. The Revocation Order also omits critical facts related to alleged failures to administer medications. Most instances cited in the Revocation Order involve medications that were administered by L.Y.F.E. staff but not accurately documented, with the only exceptions being a medication that was delayed by a prior authorization requirement imposed by the insurer and a medication that required a non-routine prescription. Such minor infractions do not justify an emergency closure or a license revocation.

Per Director Williams, the Revocation Order and Removal Order were confidential and were not to made public. Yet, at least one media outlet received the Revocation Order and the Removal Order within 24 hours of them being issued by Deputy Secretary Miller-Wilson. *See* DaniRae Renno, "State closes Dauphin

County juvenile center over escapes, 'gross incompetence," HARRISBURG PATRIOT-NEWS (Feb. 26, 2026).[1] Upon information and belief, Deputy Secretary Miller-Wilson and/or Director Williams leaked the Revocation Order and the Removal Order to the press. The defamatory statements contained in the Revocation Order and Removal Order caused an avalanche of negative press against L.Y.F.E. and its owners, which presumably is why Deputy Secretary Miller-Wilson and/or Director Williams leaked them to the press in the first place.

Notwithstanding this attempt to smear L.Y.F.E. and apparently persuade it to simply accept the Revocation and Removal Orders, L.Y.F.E. filed a timely appeal of both orders with the Pennsylvania Bureau of Hearings and Appeals (BHA). Unfortunately, despite L.Y.F.E.'s timely appeal of the Removal Order, the BHA took no action to address that appeal before L.Y.F.E. was forced to close and watch all of its residents displaced. Tragically, after Deputy Secretary Miller-Wilson and Director Williams abruptly revoked L.Y.F.E.'s license without lawful justification and ordered the immediate removal of all students under a non-existent emergency, one former L.Y.F.E. student was shot and paralyzed and several other former L.Y.F.E. students were sex trafficked.

L.Y.F.E. Discovers Disparate Enforcement, Unequal Treatment, and the Selective Exercise of Regulatory Authority by OCYF

In the wake of the Orders, L.Y.F.E. began researching and reviewing revocation notices and orders issued by Deputy Secretary Miller-Wilson against other youth shelter care and detention facilities. The results were stunning.

L.Y.F.E. learned that Deputy Secretary Miller-Wilson had issued revocation notices and orders for multiple facilities based on violations that were more egregious than the allegations against L.Y.F.E. but, unlike L.Y.F.E., Deputy Secretary Miller-Wilson issued no removal order directing their immediate closure. Moreover, Deputy Secretary Miller-Wilson rescinded his prior revocation orders and entered into settlements with each of those facilities. A sampling of the revocation orders and underlying charges against those facilities, which exhibit stark evidence of disparate enforcement and unequal treatment directed towards L.Y.F.E., is set forth below. Additional information can be found here: file:///C:/Users/cacoyle/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/IJK8GNE2/DHS_Evidence_Final_2026-11-06.html.

[1] *Available at*: https://www.pennlive.com/news/2026/02/state-closes-dauphin-county-juvenile-center-over-escapes-gross-incompetence.html.

Abraxas Academy (Berks County, Pennsylvania): On November 25, 2025, just 92 days before revoking L.Y.F.E.'s license, Deputy Secretary Miller-Wilson signed a license revocation order against Abraxas Academy's Secure Detention Unit. The violations documented by OCYF were extraordinarily serious. According to OCYF's own licensing inspection findings:

- On November 4, 2025, an employee placed a hand on a child's neck and shoved the child's face onto a table.

- Facility leadership failed to report suspected child abuse to ChildLine, even after receiving specific instructions from OCYF on November 13, 2025. More than 24 hours later, the required report still had not been made.

- The facility failed to properly report an attempted escape involving police services and allegations that a staff member supplied contraband to juvenile residents.

- OCYF documented multiple failures in management and incident-reporting procedures.

- The facility failed to provide requested documentation relating to an active child abuse investigation, requiring intervention involving its Executive Director of Operations.

- Inspectors also identified a hazardous opening in a bathroom shower wall.

OCYF concluded that the facility was not in substantial compliance with applicable regulations and did not qualify for a provisional license. Deputy Secretary Miller-Wilson's revocation explicitly characterized the conduct as "gross incompetence, negligence, and misconduct." Those are the very same terms used in the Department's action against L.Y.F.E. Yet, the consequences to the providers were dramatically different. At Abraxas Academy, the Department revoked one secure detention license, reduced its licensed capacity, and permitted two other licenses on the campus to remain in effect. Rather than ordering the immediate removal of every child from the campus, children remained at the facility, and OCYF continued conducting weekly onsite monitoring.

Consider what that means. At Abraxas, OCYF documented the physical mistreatment of a child, failures to report suspected abuse, and failures to cooperate with investigators. Nevertheless, OCYF permitted children *to remain on the campus*. At L.Y.F.E., the Department issued an emergency removal order simultaneously with its revocation, based on far less serious alleged infractions.

Same Deputy Secretary. Same Chapter 3800 regulatory framework. Same characterization of gross incompetence, negligence, and misconduct. But two profoundly different exercises of governmental authority.

Blair County Children, Youth and Families (Blair County, Pennsylvania). OCYF's handling of Blair County Children, Youth and Families provides another revealing example of the OCYF's disparate treatment of licensed providers. Beginning in May 2022, DHS issued four consecutive provisional licenses to Blair County following repeated regulatory violations involving child safety assessments, investigation timeliness, supervisory oversight, and failures to conduct thorough assessments. These were not isolated concerns; they were longstanding deficiencies documented over multiple years.

On May 5, 2024, Blair County's fourth provisional license expired. Pennsylvania state law did not permit the issuance of a fifth provisional license. Consequently, OCYF revoked Blair County's license. Yet, instead of allowing that revocation to terminate the Blair County's operations, OCYF immediately entered negotiations with the County. Approximately three weeks, OCYF and Blair County reached a settlement agreement allowing the County to continue operating the facility while receiving intensive state supervision.

OCYF subsequently provided onsite assistance, technical support, management intervention, and ongoing monitoring. An appointed state operations manager worked alongside county personnel, reviewing organizational practices, directing corrective action, and helping oversee essential functions. In other words, when it came to Blair County, OCFY did not simply identify purported regulatory failures. It invested substantial resources in correcting them. Then, on April 2026, something remarkable occurred. Just 44 days after signing L.Y.F.E.'s emergency removal and revocation orders, Deputy Secretary Laval Miller-Wilson restored Blair County Children, Youth and Families's licensing status.

Consider the significance of that decision. The same unelected bureaucrat who exercised the extraordinary power of emergency removal against L.Y.F.E. also exercised his authority to permit another organization to continue operating while

addressing regulatory deficiencies. This begs the question: why did OCYF chose intervention and rehabilitation for other organizations, but immediate removal and closure for L.Y.F.E.?

Abraxas Marienville (Forest County, Pennsylvania). In August 2024, Pennsylvania State Police filed criminal charges against a mental-health counselor employed at an Abraxas facility in Marienville, Pennsylvania. The charges arose from allegations that the employee engaged in sexual activity with multiple juvenile residents. According to the criminal complaint, a ChildLine report had been filed on March 2, 2024, identifying several juvenile clients as alleged victims. These were criminal allegations against an employee, rather than adjudicated licensing findings against the facility. Nevertheless, their severity is undeniable. Despite these reported allegations, Abraxas 1 continued to appear as a residential program in Pennsylvania's August 2026 affiliated-program records.

Summit Academy and George Junior Republic (Western Pennsylvania). In July 2024, civil lawsuits involving 92 former residents alleged extensive sexual abuse at several Pennsylvania juvenile facilities, including Summit Academy and George Junior Republic. The allegations included sexual assaults, physical abuse, retaliation, and failures to protect children from misconduct by adults entrusted with their care. These are allegations in civil litigation, not established regulatory findings. However, the claims were sufficiently substantial to prompt extensive litigation and public scrutiny. Still, both Summit Academy and George Junior Republic remained identified as residential programs in the Commonwealth's August 2026 affiliated-program records.

The Commonwealth's own youth facilities: The Associated Press has reported allegations of sexual and physical abuse at state-operated facilities, including Loysville Youth Development Center, North Central Secure Treatment Unit, and South Mountain Secure Treatment Unit. The allegations included assaults by employees responsible for supervising and protecting children, along with failures to respond appropriately to reports of misconduct. Nevertheless, the affected state-operated programs continued to appear in Pennsylvania's youth-program records.

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In short, L.Y.F.E. discovered that Deputy Secretary Miller-Wilson, Director Williams, and other OCYF officials employed a different set of rules for L.Y.F.E. than those utilized for countless other licensed providers. Again, L.Y.F.E. is a 100% minority owned business.

L.Y.F.E. Requests and Secures a Meeting with Deputy Secretary Miller Wilson to Discuss Reinstating L.Y.F.E.'s License Pursuant to a Negotiated Settlement

Given OCYF's treatment of other facilities as well as specific written requests by Dauphin County elected and appointed officials to restore L.Y.F.E license and operations, copies of which are attached hereto as **Appendix D**, L.Y.F.E. believed that it could reach a similar resolution with OCYF and sought a meeting with Deputy Secretary Miller-Wilson. We met with Deputy Secretary Miller-Wilson on May 20, 2026. An express condition of the meeting was that Deputy Secretary Miller-Wilson did not want to address any of the issues raised in the Orders—which we found peculiar since they are supposedly the reasons why OCYF revoked L.Y.F.E.'s license.

When the meeting commenced, Deputy Secretary Miller-Wilson excoriated Mr. Ellison for L.Y.F.E. providing the range of trauma therapeutic and counseling services facility residents. Deputy Secretary Miller-Wilson said "L.Y.F.E. is a 30-day shelter, not a treatment facility," and therefore, L.Y.F.E. does not "need programming beyond a shelter." Deputy Secretary Miller-Wilson added that L.Y.F.E. does not need "psychiatrists and other proposed staff to operate a shelter." Then, Deputy Secretary Miller said something truly remarkable: L.Y.F.E. should think of itself as a "weigh station." In other words, according to the highest ranking official at OCYF, kids are just cargo that should be moved around like freight from one train to another. We were both floored by Deputy Secretary Miller-Wilson's statement.

After we composed ourselves, Mr. Ellison responded that L.Y.F.E. accepts children of all ages, oftentimes with significant mental, emotional, and behavioral challenges that other shelters cannot accommodate or refuse to accept. Mr. Ellison explained that he and Mr. Hasan specifically designed L.Y.F.E.'s program to provide enhanced services to those vulnerable youth until they could be placed in a formal therapeutic environment. Mr. Ellison added that he and Mr. Hasan provide these enhanced services free of charge.

In rebuttal, Deputy Secretary Miller-Wilson stated those services were unnecessary because children placed at L.Y.F.E should be in placement for only 30 days, and thus the benefit of such services over that period of time would be negligible. Mr. Ellison disagreed. He told Deputy Secretary Miller-Wilson that whether children are placed at L.Y.F.E. for three days or 30 days, he believed that trauma services were a benefit for them; moreover, he informed Deputy Secretary

Miller-Wilson that students oftentimes remain at L.Y.F.E for longer than 30 days because their home counties are unable to find suitable placements for them. Deputy Secretary Miller-Wilson reiterated that L.Y.F.E. was merely a shelter and he found no value in L.Y.F.E.'s trauma services or its proposal to hire more staff to provide more services to residents.

Mr. Ellison rhetorically asked Deputy Secretary Miller-Wilson if he expected L.Y.F.E. to simply discharge residents after 30 days and transport them to the doorsteps of their home counties' administration buildings regardless of whether their home counties had a suitable placement for them or not? Deputy Secretary Miller-Wilson coldly responded that was a home county problem, not L.Y.F.E.'s. Once again, we were both stunned—not just because of Deputy Secretary Miller-Wilson's callous statement—but because of what it implied: not only was the lack of a suitable student placement not L.Y.F.E.'s problem, but it also wasn't his or OCYF's problem either.

Mr. Ellison again expressed his disagreement. He noted that both he and Mr. Hasan established close relationships with their residents, so L.Y.F.E was concerned about suitable placement of its residents—and kept track of their whereabouts and well-being to the extent possible. By way of example, Mr. Ellison informed Deputy Secretary Miller-Wilson that five residents which he ordered removed from L.Y.F.E. were placed in a Philadelphia area shelter from which they promptly absconded and remained at large on Philadelphia streets for a week before four turned themselves in to police and one somehow made her way back to Dauphin County. Mr. Ellison additionally informed Deputy Secretary Miller-Wilson that two other students contacted him from a Fifth Avenue hotel in Manhattan and informed him they were there on vacation with an "uncle" who was staying in the room across the hall—which was a clear indication they were being sex trafficked. (These two of three former L.Y.F.E students that were sex trafficked.) Mr. Ellison further informed Deputy Secretary Miller-Wilson that due to his directive to immediately close L.Y.F.E., a former L.Y.F.E. resident whose home county had no placement options for her, and would have placed her back at L.Y.F.E. but for its closure, was tragically shot, paralyzed and hospitalized.

Deputy Secretary Miller-Wilson appeared disinterested in these children's stories. Indeed, he did not ask Mr. Ellison for their names, current locations, or status. He simply returned to his point that he was not interested in L.Y.F.E maintaining its level of trauma services for children or allowing stay durations beyond 30-days. The meeting concluded without any resolution or settlement. More importantly, Mr. Ellison, Mr. Hasan, and their counsel left that meeting disturbed

that the health, safety, and welfare of at risk children in this Commonwealth—particularly children of color—were in his hands.

L.Y.F.E. Renews its Efforts to Obtain Approval from OCYF of its 2025-2026 FY Budget But the Stonewalling Continues, Causing Substantial Harm to L.Y.F.E.

Following the Revocation Order and Removal Order, L.Y.F.E. renewed its efforts to obtain approval from OCYF of its 2025-2026 fiscal year budget. Unfortunately, the stonewalling continued. This is despite the fact that L.Y.F.E. advised OCYF that "the delay has resulted in L.Y.F.E. not receiving payments for nearly a year, which is becoming a significant concern." In one notable exchange Samantha Feldman, Time Study Lead for OCYF, wrote to L.Y.F.E. on May 26, 2026: "The budget packets have been sent to *OCYF management* pending final review." (emphasis added). Upon information and belief, Ms. Feldman meant Deputy Secretary Miller-Wilson and Director Willson when she used the phrase "OCYF management." But OCYF claimed six months earlier that L.Y.F.E.'s budget documents had already undergone "pending final review."

As of August 10, 2026, it had been 466 days since L.Y.F.E. submitted its 2025-2026 fiscal year budget to OCYF, and it still had yet to approve the budget. OCYF's actions have had dire financial consequences for L.Y.F.E. because multiple CCYAs have not remitted payment to L.Y.F.E. for services rendered, and will not remit such payments, unless and until OCYF approves the budget. For instance, on November 20, 2025, Bonnie J. Mirachi, Administrative Assistant for Northumberland County Children and Youth Services, sent an email to Mr. Hasan, writing:

> Hi Bilal, the email you sent last month stated that your budget packet should be approved by the State within the week. I checked again today and your agency is not on the approved list. Do you have any idea when the budget packet will be approved? I am holding all your invoices since July until I am able to complete a contract when your budget packet is approved by the State.

Ms. Mirachi sent a follow-up email to Wendy Scott, an administrative assistant for L.Y.F.E., on July 8, 2026, stating: "I went on the state website and your budget packet for 2025/2026 has not been listed as approved. You may want to contact the State and inquire why it is not listed. We cannot pay for any invoices until your budget packet is approved by the state."

Similarly, on March 24, 2026, Breanna Golab, Assistant Manager of Accounting OCY for Erie County, sent an email to Ms. Scott and another L.Y.F.E. representative, stating: "After doing some digging it appears that you have no contract for 25/26 due to your budget not being approved by OCYF state level which means no payments will be given. Once that is approved then payments can be made after a contract is completed." By way of another example, on May 20, 2026, Bonnie Danubio, Fiscal Office for the Lehigh County Office of Children and Youth Services, sent an email to Mr. Hasan and Ms. Scott, writing: "We will not be paying the invoices from fiscal year 25-26, until your budget packets from the state are approved. Until they are approved, these costs are non-reimbursable to the county. I have reached out to the state for an estimate of when the forms would be approved, and cannot get an answer." Ms. Danubio sent a follow-up email to Ms. Scott on July 9, 2026, writing: "We are still waiting for the state to approve your budget forms. I was told a month and a half ago, that it would be about 2 weeks. I do not have an estimated date."

Likewise, on December 12, 2025, Valerie Sherman-Thompson, Fiscal Development Director, Children & Youth for CYS Carbon County Children & Youth, sent an email to Mr. Ellison, stating: "I still do not see a budget packet approved by the state for FY 25/26. Has there been any progress made on this? We would really like to get your contract completed." More recently, on July 24, 2026, Kimberley Scott of Wyoming County Human Services, sent an email to Mr. Hasan and Ms. Scott, stating:

> I have been asked to reach out and make inquiries regarding BCL's original submission and approval of the Title IV-E Budget Documentation Forms to the OCYF DocuShare website, as well as the subsequent removal of the same documents.
>
> To date I find no approval of the 25-26 documents on the website.
>
> Would you please provide us with the date the forms were originally approved by OCYF for 25-26.
>
> The date the documents were removed from the website.
>
> And provide any documentations that backup OCYF's decisions.
>
> It is Wyoming County Humna [sic] Services' desire to see this situation

resolved as it is BCL's.

OCYF's delay in approving L.Y.F.E.'s 2025-2026 fiscal year budget has had a crippling impact on L.Y.F.E. L.Y.F.E. collectively is owed $2,791,753.14 from seven CCYAs. Each CCYA has attributed its refusal to pay to the absence of an approved 2025-2026 fiscal year budget by OCYF, which, again, is led by Deputy Secretary Miller-Wilson. The outstanding balance is so great that it threatens L.Y.F.E.'s very existence, which, in and of itself, amounts to irreparable harm.

But the irreparable harm caused by Deputy Secretary Miller-Wilson's and Director Williams' actions extend beyond L.Y.F.E. L.Y.F.E. is a vital resources for at-risk youth across the Commonwealth of Pennsylvania, especially those in Dauphin County as L.Y.F.E. is the only youth shelter within the County. L.Y.F.E.'s closure has left vulnerable youth without support and exposed several to severe consequences. Again, one former L.Y.F.E. student was shot and is now paralyzed for life due to OCYF's Revocation and Removal Orders, while at least three other former L.Y.F.E. students have been sex trafficked since being removed from L.Y.F.E.'s care. And there are the countless youth who were never given the opportunity to seek safe shelter at L.Y.F.E. due to Deputy Secretary Miller-Wilson's actions and suffered resultant harm. Thus, OCYF did not achieve its stated goal of keeping youth safe by closing L.Y.F.E. To the contrary, students were irreparably harmed by Deputy Secretary Miller-Wilson's unjustified Revocation and Removal Orders.

OCYF Approves L.Y.F.E.'s 2025-2026 FY Budget Only After L.Y.F.E. Threatens Them With Litigation

On August 10, 2026, at 1:35 p.m., L.Y.F.E. sent OCYF a draft Complaint seeking, *inter alia*, to compel Deputy Secretary Miller-Wilson and Director Williams to approve L.Y.F.E.'s 2025-2026 budget immediately. On August 11, 2026, at 12:06 p.m., OCYF, through its counsel, advised L.Y.F.E. that Deputy Secretary Miller-Wilson and Director Williams finally approved L.Y.F.E.'s 2025-2026 budget. Thus, it was only after L.Y.F.E. threatened litigation against OCYF that they finally approved L.Y.F.E.'s budget for the 2025-2026 fiscal year.

Call to Action

Deputy Secretary Miller-Wilson remarked shortly after he joined OCYF: "Government officials receive the sometimes-unfair reputation of not caring or not interested in solutions . . .. But my state colleagues are smart, empathetic, dedicated

and willing to hold themselves and other people accountable at all hours of the day."[2] But actions of him and the agency he leads stand in stark contrast to those words.

Deputy Secretary Miller-Wilson's and Director Williams' apparent vendetta against L.Y.F.E. did not just cause harm to L.Y.F.E.; it also caused harm to the communities and vulnerable youth L.Y.F.E. served. The question now is who will hold Deputy Secretary Miller-Wilson and Director Williams, his direct report, accountable for the harm they have caused L.Y.F.E., the at-risk youth it served, and countless communities across Pennsylvania for their abuse of power? Because the fact remains, whatever Deputy Secretary Miller-Wilson's and Director Williams' motivations, they cannot be allowed to weaponize the licensure revocation and budget approval process to harm licensed providers like L.Y.F.E.

[2] "Former Skadden Fellow Laval Miller-Wilson Leads Pennsylvania's Office of Children, Youth & Families," Skadden Foundation (Winter 2024), *available at*: https://www.skaddenfellowships.org/fellowship-spotlight/2024/02/fellow-profile-laval-miller-wilson.

Appendix A

[redacted]

From: James Ellison <jellison@lyfeteam.org>
Sent: Sunday, July 30, 2023 8:26 PM
To: c-meweaver@pa.gov
Attachments: IMG_2905.jpg; IMG_2902.jpg; IMG_2906.jpg; IMG_2901.jpg; IMG_2904.jpg

Melissa:

I hope your weekend is going well. We are having a challenging day. I have attached pictures of property damage committed today by Autumn and several other girls. They totally DESTROYED one of the pods and did so bc they are aware that we cannot restrain them from destroying property. This is unsustainable. We need some regulatory flexibility. As we discussed, we would request a meeting with your supervisor asap.

J.

Sent via the Samsung Galaxy S23+ 5G, an AT&T 5G smartphone
Get Outlook for Android


NOW HIRING


GBC
Nisha


PERFECTLY PUZZLING


Bitch



Appendix B

M E M O R A N D U M

TO: Dauphin County Partners (CYS/JPO/OCC/DCJC) **FILE:** Government Services

FROM: James Ellison

RE: DHS/OCYF License Renewal

As you recall, my last update to you regarding our licensure status was on July 10, 2024. At that time, I provided you with our Licensing Inspection Summary (LIS) which was issued by the Commonwealth of Pennsylvania DHS-OCYFS ("OCYFS") following a two-day inspection on June17-18, 2024. I reminded you that during our first inspection in March 2023, we were noted for over 130 "areas of noncompliance", followed by our second inspection in December 2023 where the noted "areas of noncompliance" dropped to a total of 38 but with some repeat violations. But our LIS for the June 2024 inspection noted only five (5) "areas of noncompliance" with zero repeat violations. Based upon our steady record of compliance and improvement, we expected our imminent re-classification from provisional to full licensure status at the expiration of our 2nd provisional license on August 21, 2024.

We were contacted by OCYFS on August 19, 2024 (two days before our then-current 2nd provisional license was set to expire) and requested to participate in a Zoom call on August 23, 2024, to discuss our program. Gabrielle Williams, Sara Dufresne, Melissa Benoit and Caitlin Robinson were on the call, during which Ms. Williams advised us that we were being placed on a 3rd provisional license. When asked for an explanation, she stated that OCYFS was concerned about the number of CPS investigations we had regarding restraints, and she wanted us to get additional SCM and de-escalation training for our staff. I asked her how many CPS investigations we had over the past year involving improper SCM restraints and failure to de-escalate. Neither she nor anyone else on the call knew that number until I informed them that it was exactly three (3), with two of them occurring during our 1st provisional license period (Aug 21, 2023 - February 21, 2024) and the last occurring on the first day of recent 2nd provisional license period (February 21, 2024 – August 21, 2024). I then asked her based upon what objective numerical standard was she determining that our number of restraints/de-escalation CPS investigations should result in us being placed or kept on provisional especially given the fact that we had improved our inspection results from over ONE HUNDRED THIRTY findings in 2023 down to FIVE in 2024. She stated that there wasn't any way to determine such a standard because every section 3800 facility is different. This sounded unfathomable as I pointed out that it was difficult for me to believe that there was no way for OCYFS to objectively compare us to other providers our size or provide us the objective numerical standard by which OCYFS determines a provider should be placed on provisional licensure due to CPS restraints/de-escalation investigations - - which apparently, in our case, was three. Again, we were told there was no answer to that question and it was on a case-by-case basis.

In addition to Ms. Williams informing us that we would be required to undergo additional SCM/de-escalation training, she requested that we voluntarily stop accepting students during the new provisional period. I told her that we could not agree to that because Dauphin County relies upon us to service their children. This was a peculiar but not unexpected request because OCYFS

had previously suggested that we stop taking Dauphin County children with behavioral issues or we would jeopardize our license (you may recall when Ms. Williams basically told us us during a Zoom call last year that we had to let several female students tear the building apart and we had better not physically intervene or we risked being cited because preventing property destruction was not a proper basis on which to restrain a student). We told them on those prior occasions that not accepting Dauphin County students was not an option, and we trusted that we would be able to work with OCYFS to satisfy their expectations without freezing out Dauphin County. We emphasized the same position during our Zoom meeting. The meeting concluded with Ms. Williams advising us that we would receive our 3rd provisional license the following week, which we did on August 27, 2024.

Upon receipt of the 3rd provisional licensure paperwork (attached), I noted that the basis for the 3rd provisional license were two CPS investigated restraints which WE self-reported for investigation- - one occurred and was investigated during our 1st provisional licensure period (January 2024) and the other which occurred on the 1st day of our 2nd provisional licensure period - - as well as an unfounded Childline CPS investigation which yielded an unsigned student ISP that did not adequately establish that monthly progress notes were being sent to the placing agency. Incredibly, the provisional was also based on our last LIS which only contained 5 negative findings, the majority of which were minor (one child wasn't given the facility grievance procedures upon admission; one staff member had a filed volunteer clearance instead of an employment clearance; three student records were missing social security numbers because the referring counties did not provide them; one staff member's high school transcript did not adequately establish that he graduated because it was missing a page; and a student was placed in the facility de-escalation room for 30 minutes without a staff member physically present though she was being monitored on the main video monitor in the control room literally ten yards away. You will note that plans of correction for each item listed as a basis for the provisional license were previously submitted to and approved by OCYFS.

Thus, to recap, we were placed on a 3rd provisional for: two self-reported restraint investigations (one of which did not occur during the then current 2nd provisional licensure period); an un founded CPS investigation which instead yielded a minor paperwork issue; and our most recent OCYFS license inspection which produced our best results to date - - reducing our negative findings from 135+ in March 2023 to FIVE in June 2024 with ZERO repeat violations. It is beyond me how this resulted in a 3rd provisional license. Please contact me if you have any questions.

Appendix C

LYFE
LEADING YOUTH FOR EXCELLENCE

October 23, 2024

To: Gabbi Williams/Sara Dufresne

Good afternoon:

This memorandum follows our meeting of last week with Sara Dufresne regarding our concerns with the impact of certain regulatory directives we have been given pertaining to the operation of our facility and is intended to recap the issues discussed.

POD DOOR WINDOW COVERINGS

Previously, we covered pod windows with tint, newspaper, etc., as a security measure to prevent both students passing by pods through hallways and students located in those pods from seeing each other. This prevented students from identifying which pods other students occupied so that they could not target each other for violence, as many of the students here (male and female) are aggressive and come from neighborhoods where they are negatively acquainted with each other and bring those experiences with them into the facility; moreover, it prevented aggressive students from identifying less aggressive students as targets for bullying. Further, it decreased opportunities for male and female students to identify each as potential partners which increased their desire to attempt to interact with each other romantically and engaged in efforts to access each other that oftentimes lead to conflict as staff worked to keep them separated. By keeping the windows covered, we were able to effectively manage building movements and temperature, thereby decreasing the opportunity for inter-pod conflicts between students. Once we were compelled to remove window coverings, students were able to locate and identify each other, which caused increased aggressive behaviors based upon personal dislikes, neighborhood/school rivalries, opportunities to bully perceived weaker students, and romantic attractions (which often led to aggressive actions towards staff for inhibiting student opportunities to act on that attraction and aggressive acts/retaliation between romantic rivals for the attention of one or more students for whom both shared mutual interest).

STAFF DOORWAY COVERAGE

Initially, we were told that we could have staff posted at the pod door entrances as a measure to discourage students from leaving the pod. We were also told that if students became physically aggressive with staff by trying to push through or hitting/assaulting them in order to leave the pod, then we could restrain them to maintain staff and/or student safety. This was an invaluable operations method (particularly after we were told to remove the doorway window covers) because it gave us the ability to prevent students from roaming the hallways/pods/building looking for trouble with other students - - especially when we knew that was their intent. Indeed, there were many occasions where we restrained students who tried to push through staff to leave the pod because they made it clear that they intended to assault another student seen walking past their door or were planning to enter another pod where they knew they could find a student they wanted to fight. Essentially, we were able to decrease violence between students because we got ahead of those situations by

maintaining pod integrity through restraints when we knew students intended to harm one another and tried pushed through or assaulted staff to leave the pod to do so. When we were told that we could no longer place staff at the pod doors as obstacles or restrain students who initiated contact with staff to leave the pod, but had to permit students to leave (even if they pushed staff), we explained what would happen to other students if we simply allowed students to exit their pods to roam the halls and enter other pods at will. Though our point was the risk of harm to other students would be imminent, we were nonetheless told we could no longer restrain to PREVENT students from departing their pod to perpetrate harm - - we could only restrain at the instant the harm occurred. We expressed concern that such instructions would put us in a position where, instead of restraining one student on pod to prevent an incident, we would be risking multiple restraints of multiple students in areas of the facility which could draw additional students into the fray. Though our concerns were heard, the policy remained unchanged. And that policy combined with our inability to cover the windows to prevent students from identifying and locating each other, has led to students walking off pod with impunity to engage in acts of aggression and violence against other students. After expressing these concerns to Ms. Dufresne, she advised that our original method of operation, i.e., standing in front of students and restraining them if they pushed through staff, was appropriate. We would like confirmation that we can return to this method of operation so that we are certain that we are in compliance with departmental expectations and regulatory interpretation.

PROPERTY DAMAGE

We have been advised that we cannot restrain students from engaging in property damage even when we have a reasonable belief that the property damage will present a risk to others. For example, we have been told that we cannot restrain a student for trying to throw around furniture/trash cans/stationary objects, etc., even though we know that student will likely throw something at another student or staff member. Instead, we are required to wait until that student actually throws an object at someone before we can restrain - - at which time it's too late if he/she strikes someone. Similarly, we could not restrain students from literally pulling fire alarms off the walls (rendering them inoperable) despite the fact that having nonfunctioning alarm puts students at risk from that moment until the alarms can be repaired. Nor can we restrain students as they attempt to pull fire extinguishers off the walls even though we know their intent is to strike someone with or discharge it - - both of which present a danger to staff and students and have been attempted or actually happened. In other cases, students have intentionally damaged property, such as fire extinguisher housings, glass windows, plastic showcase doors, etc., and taken pieces of the damaged items to use as cutting instruments, oftentimes for self-harm which presents a risk of suicidal ideation or suicide attempts. The inability to restrain students (after de-escalation attempts) from engaging in this type of conduct increases the risk of harm to themselves and others, especially when staff is tasked with the riskier proposition of restraining students afterwards to retrieve damaged property capable of harming them (and others) while they are wielding it prior to and/or during the restraint.

VISITATION/DE-ESCALATION ROOM

When we assumed operational control of this facility in 2022, the visitation room door had a fully engaged automatic locking system which had been in existence for years. That system was in place when the department inspected and approved the facility prior to issuing our license and during subsequent inspections. We advised the department that we were using the room as a de-escalation room for students who were having aggressive/violent episodes to give them the opportunity to cool off and process with staff. We were instructed that if we placed students in the room, staff had to perform visual checks at 5-minute intervals. We provided those instructions to our staff so that they were aware. In spring of 2024, while reviewing footage of a student who was placed in the room to de-escalate, it was noted that while the on-screen time stamps showed staff checks exceeded the minimum 5-minute interval on several occasions by one or two minutes, there were no staff checks performed between 630pm and 7:00pm. It was reiterated to us that either the 5-minute checks needed to be completed, or staff would need to be in the room with students. We acknowledged the instructions but pointed out that sometimes staff's presence in the room while students are elevated and aggressive presents a safety risk because students may spit on, kick, or punch staff. In response, we were told that staff need only be in the room area and sitting outside the room while maintaining a visual on students through the exterior windows would suffice. We immediately informed all staff of this directive and placed

posted signs on the room door advising staff that when students are placed in the room, staff is required to be either inside the room or immediately outside the room while maintaining a visual on the student through the room windows. This incident was noted as an area of non-compliance in our LIS for our June 2024 inspection. In response, we submitted our approved plan of correction which required staff to maintain a presence with students in the room area (in accordance with prior guidance provided to us following the incident which gave rise to the non-compliance finding). Recently, during an unrelated CPS investigation (which was declared unfounded), we were made aware that video was being requested of a student placed in the de-escalation room following an incident to establish that the door was locked. We inquired as to why that was an issue since video showed that staff was both immediately outside of the room (next to the window) while communicating with the student as she calmed down, and inside the room with student for a period of time before exiting the room again and resuming her original position while maintaining a visual of the student. We were then told, for the first time, that staff was required to be inside the de-escalation room with the student at all times, which was contrary to what we had been previously told months earlier that it was permissible for staff to be in the room area - - outside the room by the windows. We expressed that we were operating within the parameters given to us and had no problem modifying those parameters to require staff to be present in the room or simply leaving the room door ajar, but we needed DEFINITIVE and CONSISTENT guidance and would hope to not be cited for operating in accordance with prior guidance that was either provided inadvertently or being modified in real time. We are still awaiting word as to what that guidance will be.

DE-ESCALATION VS. RESTRAINTS

During an August meeting with department reps regarding our placement on a 3rd provisional license, we were told that one of the main reasons for the decision was the desire to see our staff undertake less restraints and employ more de-escalation techniques. As always, upon receiving that departmental guidance, we conveyed the same to our staff and emphasized that de-escalating situations also meant separating students from the triggering event as quickly as possible. Instead of using restraints to deter aggression among students if de-escalation efforts failed or there was an imminent threat, staff was instructed to use touch prompts to re-direct students where possible to remove them from the area/source causing the escalation. For example, during a recent incident several weeks ago, a student grabbed and threw a chair clear across the room at his pod mate but missed. He then began charging towards his pod mate to attack him. Staff immediately intervened by placing themselves in front of the charging student (who was at least 175 lbs. and charging pretty hard) and repeatedly pushing him back until they could get him through the pod door and into the hallway. Within a minute or two, the student calmed and de-escalated in the hallway because staff removed him from the escalated situation he caused on the pod. Upon video review of the incident during weekly monitoring, we were told that it was improper to use touch prompts to push him back through the pod door and away from his intended target as a means of de-escalation; moreover, we were told that we should have opted instead to place him in a restraint on the pod. Upon pointing out the student's size and level of aggression would have required multiple people to restrain him and likely for an extended period given his size and strength, we were nonetheless told that a restraint, no matter how long or involved, would have been the preferred method for dealing with that student. That instruction was in opposition to the expressed expectation previously conveyed to us that we should restrain less and find ways to de-escalate situations. As we do not want to find ourselves in a position where we are following guidance that we believe to be appropriate, only to be later told that we should operate in a different fashion (as with the de-escalation room usage), we are seeking clarification of the circumstances under which we are/are not expected to restrain (vs. de-escalation).

CONCLUSION

We would like the opportunity to sit with your team to discuss these matters and our overall operations approach, in detail, so that we can have a clear understanding as to the rules of the road which we are expected to abide, and the best method by which we can achieve compliance therewith while operating this facility in a fashion that maximizes student safety without running afoul of the regulatory interpretation or departmental mandates. We would appreciate the opportunity to do so at your earliest opportunity and are amenable to meeting with your team in person at your headquarters. Thank you in advance for your time.

Very Truly Yours,

James E. Ellison

James E. Ellison
BCL Partners, LLC
Chief Executive Officer
General Counsel
Jellison@lyfeteam.org

911 Gibson Blvd.
Steelton, PA. 17113
Tel: 717.979.5857
www.lyfeteam.org

Appendix D

Re: Request for Negotiated Resolution and Reopening of L.Y.F.E. Facility (Steelton, PA)

Dear Secretary Valerie Arkoosh, MD, MPH,

We write to express our continued concern regarding the closure of the L.Y.F.E. (Leading Youth for Excellence) facility in Steelton, Pennsylvania, and to respectfully request that the Department pursue a negotiated resolution that would allow for the facility's safe and structured reopening.

L.Y.F.E. has served as a critical resource for high-risk and at-risk youth across the Commonwealth, providing trauma-informed care, behavioral health services, and placements for individuals who often cannot be accommodated elsewhere. The facility has supported youth from approximately 20 counties and has played an important role in stabilizing some of Pennsylvania's most vulnerable populations.

We fully recognize and respect the Department's responsibility to ensure the safety and well-being of youth in residential care settings. At the same time, we believe it is essential to consider both the system-wide consequences of the closure and the most effective path forward to restore services in a responsible and sustainable manner.

Since the shutdown, we have become increasingly concerned about:

- The displacement of youth without clear or coordinated placement alternatives
- Reports of youth becoming missing or otherwise unaccounted for
- The loss of a facility specifically equipped to manage higher-risk cases

Based on information presented to us, there are also material disputes regarding the findings underlying the closure, including questions related to regulatory interpretation, reporting requirements, and operational constraints imposed on staff. We understand that L.Y.F.E. has formally appealed the Department's action and has demonstrated a willingness to work collaboratively to address any outstanding concerns.

Importantly, L.Y.F.E. has continued to act in good faith during this period by:

- Maintaining staff and operational readiness
- Investing in facility improvements
- Continuing training and program development

Given the urgency of the need and the risks posed by continued closure, we respectfully request that the Department:

1. Engage in direct, good-faith negotiations with L.Y.F.E. to reach a mutually acceptable resolution
2. Establish clear, agreed-upon conditions for reopening, including monitoring and compliance benchmarks
3. Move expeditiously toward reinstating L.Y.F.E.'s license and operations under a structured and accountable framework

We strongly encourage the Department to prioritize a negotiated solution in lieu of reliance on the appeals process. We believe this approach best balances the Department's oversight responsibilities with the Commonwealth's need to provide safe, stable placements for vulnerable youth.

Thank you for your time and consideration of this matter. We would welcome the opportunity to discuss further and assist in any way that may be helpful.

Sincerely,
George P. Hartwick, III
Commissioner
Dauphin County, Pennsylvania



Signature

Apr 23, 2026

Date

DAUPHIN
COUNTY

OFFICE OF HUMAN SERVICES DIRECTOR
DAUPHIN COUNTY ADMINISTRATION BUILDING
2 SOUTH SECOND STREET
HARRISBURG, PA 17101
(717)780-6288

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Randie Yeager

May 4, 2026

Secretary Valerie Arkoosh, MD, MPH
625 Forster St.
Harrisburg, PA 17120-0001

Dear Secretary Arkoosh:

I am writing to express my continued concerns regarding the closure of the LYFE (Leading Youth for Excellence) shelter care facility in Steelton, Pennsylvania, and to respectfully request that the Department pursue a negotiated resolution that would allow for the facility's safe and structured reopening.

LYFE has served as a critical resource for high-risk and at-risk youth across the Commonwealth, providing trauma-informed care, behavioral health services, and temporary shelter placement for youth who often are not accepted in other facilities. This service is vital to keeping our youth in Dauphin County and close to services, supports and their educational programming. Since the shutdown, we have become increasingly concerned about youth absconding from other facilities outside their local area and their elopement has put them at further risk.

We fully recognize and respect the Department's responsibility to ensure the safety and well-being of youth in residential care settings. At the same time, we believe it is essential to consider both the system-wide consequences of the closure and the most effective path forward to restore services in a responsible and sustainable manner.

Based on information presented to us, there are also material disputes regarding the findings underlying the closure, including questions related to regulatory interpretation, reporting requirements, and operational constraints imposed on staff. We understand that LYFE has formally appealed the Department's action and has demonstrated a willingness to work collaboratively to address any outstanding concerns.

Since February 25, 206, much work has been completed on the facility by both LYFE and Dauphin County Maintenance Department. In addition, to the physical plant improvements, LYFE has maintained staff for operational readiness and additional training has been completed by myself along with Dr. Taffy Anderson related to Trauma Informed Approaches. I appreciate your time and consideration for this critical local resource. Please contact me with any questions or concerns at 717-780-6288 or ryeager@dauphincounty.gov. Thank you and take care.

Sincerely,

Randie Yeager

Randie Yeager
Dauphin County Human Services Director

Re: Request for Negotiated Resolution and Reopening of L.Y.F.E. Facility (Steelton, PA)

Dear Secretary Valerie Arkoosh, MD, MPH,

We write to express our continued concern regarding the closure of the L.Y.F.E. (Leading Youth for Excellence) facility in Steelton, Pennsylvania, and to respectfully request that the Department pursue a negotiated resolution that would allow for the facility's safe and structured reopening.

L.Y.F.E. has served as a critical resource for high-risk and at-risk youth across the Commonwealth, providing trauma-informed care, behavioral health services, and placements for individuals who often cannot be accommodated elsewhere. The facility has supported youth from approximately 20 counties and has played an important role in stabilizing some of Pennsylvania's most vulnerable populations.

We fully recognize and respect the Department's responsibility to ensure the safety and well-being of youth in residential care settings. At the same time, we believe it is essential to consider both the system-wide consequences of the closure and the most effective path forward to restore services in a responsible and sustainable manner.

Since the shutdown, we have become increasingly concerned about:

- The displacement of youth without clear or coordinated placement alternatives
- Reports of youth becoming missing or otherwise unaccounted for
- The loss of a facility specifically equipped to manage higher-risk cases

Based on information presented to us, there are also material disputes regarding the findings underlying the closure, including questions related to regulatory interpretation, reporting requirements, and operational constraints imposed on staff. We understand that L.Y.F.E. has formally appealed the Department's action and has demonstrated a willingness to work collaboratively to address any outstanding concerns.

Importantly, L.Y.F.E. has continued to act in good faith during this period by:

- Maintaining staff and operational readiness
- Investing in facility improvements
- Continuing training and program development

Given the urgency of the need and the risks posed by continued closure, we respectfully request that the Department:

1. Engage in direct, good-faith negotiations with L.Y.F.E. to reach a mutually acceptable resolution
2. Establish clear, agreed-upon conditions for reopening, including monitoring and compliance benchmarks
3. Move expeditiously toward reinstating L.Y.F.E.'s license and operations under a structured and accountable framework

We strongly encourage the Department to prioritize a negotiated solution in lieu of reliance on the appeals process. We believe this approach best balances the Department's oversight responsibilities with the Commonwealth's need to provide safe, stable placements for vulnerable youth.

Thank you for your time and consideration of this matter. We would welcome the opportunity to discuss further and assist in any way that may be helpful.

Sincerely,
Corey L. Dickerson
Chief Detective
Dauphin County, Office of District Attorney, Criminal Investigation Division

C. Dick
Corey Dickerson (Apr 21, 2026 13:07:45 EDT)

Signature

Apr 21, 2026

Date