

Position Paper: Detecting, Preventing, and Reporting Abuse in Congregate Care Settings

A Leadership Statement from Telos Releasing Our Full Internal Protocols and Calling for Industry-Wide Transparency

Second in a Series – Published by Telos Programs, including Telos Academy (Telos RTC) and Telos U

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I. Purpose of This Position Paper

At Telos, we believe that safety, transparency, and accountability are not optional—they are leadership responsibilities. As part of our commitment to raising the standards of care in youth treatment and residential programs, we are taking the uncommon step of publicly releasing our internal Abuse Prevention and Reporting Policy in full.

We do so because:

1. Parents deserve transparency.
2. Students deserve uncompromising protection.
3. The industry must evolve beyond secrecy and minimal compliance.
4. Good programs should show their work—not hide it.

This position paper presents Telos’ internal, operational protocols for abuse detection, prevention, and reporting. We explicitly invite and call on all youth residential programs, therapeutic boarding schools, treatment centers, and congregate care organizations to join us in raising the national standard by publicly sharing their own abuse-prevention policies.

Transparency builds trust. Accountability increases safety. Industry-wide openness protects students.

II. Why Abuse Prevention Policies Must Be Public

Across the United States, the youth residential treatment industry has faced increased scrutiny due to recurring reports of abuse, neglect, and under-reporting. Numerous national studies and government investigations have underscored the systemic risks inherent in congregate care:

- **U.S. Senate Finance Committee Report (2022)** – detailed widespread failures in youth residential care systems.
- **U.S. GAO Report on Youth Residential Programs** – documented serious abuse cases and lack of oversight.
- **Harvard FXB Center Research** – highlighted the long-term trauma caused by institutional maltreatment.
- **Annie E. Casey Foundation** – recommended reducing reliance on institutional settings because of safety concerns.
- **NCTSN (National Child Traumatic Stress Network)** – emphasizes the vulnerability of youth in group settings and the importance of trauma-informed supervision.

Given these concerns, Telos believes that clear, public-facing abuse-prevention policies should be the minimum standard for any program entrusted with the care of minors or vulnerable young adults.

III. Telos' Commitment to Transparency and Leadership

By publishing our full internal policy, we aim to:

1. Model Accountability for the Industry

We invite peer programs to adopt, revise, and publicize their policies. Silence and secrecy erode public trust and place vulnerable youth at risk.

2. Give Regulators and Families Confidence in Our Systems

Families should not have to guess how a program handles safety concerns.

3. Empower Staff, Students, and Referral Partners

Clear, accessible standards ensure that every stakeholder knows exactly how abuse concerns are handled.

4. Build a Culture Where Reporting Is Non-Negotiable

Culture and transparency—not only compliance—keep young people safe.

IV. Telos Internal Policy: Detecting, Preventing, and Reporting Abuse

The following section contains the internally used operational protocol, released in full as an act of leadership and transparency.

A. Policy Statement

Possible victims of abuse or neglect are identified and assessed using criteria developed by Telos. All applicable state reporting laws will be followed. Telos employees and licensed practitioners share responsibility to observe, document, and report concerns promptly and appropriately. Regarding mandatory reporting of sexual contact between students, age limits are considered, and staff use state-approved charts to determine whether student-to-student contact is illegal.

B. Procedures by Role

1. Licensed Independent Practitioners

- Address abuse concerns discovered during examinations.
- Report findings to the Telos nurse and legal authorities as required.

2. Nursing Staff

- Assess skin integrity and observe for any questionable markings or injuries.
- Document findings objectively and report concerns to the primary therapist.
- Ensure concerns proceed through appropriate state channels.

3. General Assessment

- Abuse screening occurs at admission.
- Any staff member suspecting abuse must report concerns to the student's primary therapist immediately.

4. Therapist Responsibilities

- Follow all Utah mandatory reporting laws.
- Notify the Clinical Director immediately.
- Report to the appropriate county authority (DCFS, APS, or law enforcement).
- Include the student in the reporting process when appropriate, but still report even if the student declines.
- Maintain clear, objective documentation.

5. Clinical Director Responsibilities

- Provide supervision during the assessment and treatment of abuse concerns.
- Ensure examinations occur in appropriate settings.
- Confirm compliance with state laws and Telos policy.

C. Documentation Standards

- All abuse-related documentation is kept in a confidential file separate from the clinical record.
- Documentation must be objective, factual, and timely.
- Telos cooperates fully with all investigating authorities.

D. Mandatory Reporting for Adult Clients

- Professionals must report abuse, neglect, or exploitation of vulnerable adults to APS.
 - For non-vulnerable adults, reporting is not legally mandated unless imminent danger or professional ethical standards require action.
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V. Preventative Measures and Campus Safeguards

Abuse prevention is not just a policy; it is an ecosystem. Telos maintains:

- Robust annual training in abuse detection and reporting
- A campus design to maximize visibility and reduce blind spots
- High staff-to-student ratios appropriate for level of care
- Anonymous reporting pathways for students
- Trauma-informed, relationship-based care culture
- Full cooperation with regulators and third-party oversight bodies

These layers create a culture where inappropriate behavior is difficult to hide and easy to report.

VI. Calling on Youth Programs Nationwide to Join Us

Telos urges all residential youth programs to:

1. Publicly release their internal abuse reporting policies.
2. Adopt trauma-informed, transparent, and research-backed standards.
3. Ensure staff are trained—and retrained—on mandatory reporting.
4. Eliminate secrecy around safety practices.
5. Invite external review, audit, and oversight.

The youth treatment field cannot rely on tradition or “trust us” culture. The future belongs to programs willing to show their systems, prove their safety, and be accountable.

Telos is committed to leading that change.

VII. Key National Resources Highlighting the Need for Strong Abuse Prevention

Here are authoritative sources demonstrating the ongoing national concerns about abuse in youth congregate care:

- **U.S. Senate Finance Committee Report (2022)** – “Mental Health and the Dangers of Institutionalization”
<https://www.finance.senate.gov/imo/media/doc/2022.02.10%20CCRC%20Report%20Final.pdf>
- **U.S. Government Accountability Office – Residential Treatment Programs**
<https://www.gao.gov/products/gao-08-713t>
- **National Child Traumatic Stress Network – Trauma and Residential Settings**
<https://www.nctsn.org/resources/trauma-treatment-residential-settings>
- **Harvard University FXB Center – Institutional Abuse Research**
<https://fxb.harvard.edu/research/>
- **Annie E. Casey Foundation – The Harm of Institutional Placements**
<https://www.aecf.org/resources/what-young-people-say-about-being-in-group-placements>
- **Child Welfare Information Gateway – Mandatory Reporting Guidelines**
<https://www.childwelfare.gov/topics/responding/reporting/>

These resources reinforce why strong, transparent policies are ethical, necessary, and overdue.

VIII. Conclusion

By publicly releasing our complete internal Abuse Prevention and Reporting Policy, Telos affirms its commitment to leadership, transparency, and the protection of young people entrusted to our care.

We challenge and invite every youth residential program—large or small, public or private—to join us in elevating safety standards, committing to rigorous transparency, and putting student safety above reputation.

Protecting youth is not proprietary. It is a shared moral duty.