# ON-SITE CORRECTIVE ACTION PLAN ASSESSMENT

of

### **COLUMBIA CORRECTIONAL INSTITUTION**

for the

Physical and Mental Health Survey Conducted July 17-19, 2018

## **CMA STAFF**

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#### I. Overview

On July 17-19, 2018, the Correctional Medical Authority (CMA) conducted an on-site physical and mental health survey of Columbia Correctional Institution (COLCI). The survey report was distributed on August 16, 2018. In September 2018, COLCI submitted and the CMA approved, the institutional corrective action plan (CAP) which outlined the efforts to be undertaken to address the findings of the COLCI survey. These efforts included in-service training, physical plant improvements, and the monitoring of applicable medical records for a period of no less than ninety days.

# **Summary of CAP Assessments for Columbia Correctional Institution**

Cap #	Request Date for Monitoring Documents	Cap Assessment Date	On-site or Off-site	Total # of Survey Findings	Total # of Open Findings	Total # of Closed Findings
1	2/14/19	3/28/19 – 3/29/19	On-site	98	30	68

### II. Physical Health Assessment Summary

#### A. Main Unit

The CAP closure files revealed sufficient evidence to determine that 19 of the 25 physical health findings were corrected. Six physical health findings will remain open.

Finding	Closed	Open: Adequate evidence of inservice training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met.	Open: Adequate evidence of in-service training was provided, however there were no applicable episodes available for review.	Open: Adequate evidence of in-service training was provided, however institutional monitoring was inadequate and a level of compliance could not be determined.	Open: Adequate evidence of in- service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met.	Other
Chronic Illness Clinic PH-1: In 4 of 16 records reviewed, there was no evidence inmates were seen according to their M- grade.		×				

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Finding	Closed	Open: Adequate evidence of in- service training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met.	Open: Adequate evidence of in-service training was provided, however there were no applicable episodes available for review.	Open: Adequate evidence of in-service training was provided, however institutional monitoring was inadequate and a level of compliance could not be determined.	Open: Adequate evidence of in- service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met.	Other
Sick Call PH-7: In 1 of 5 applicable records, there was no evidence of timely follow-up by the clinician upon referral.	×					
Sick Call PH-8: In 1 of 4 applicable records, there was no evidence the follow-up was complete and addressed the complaint.	×					
Infirmary PH-9: In 4 of 9 applicable records, the nursing discharge note was incomplete		×				
Infirmary PH-10: In 3 of 9 applicable records, there was no evidence of daily clinician rounds and progress notes for acute inpatients.	×					
Infirmary PH-11: In 3 of 4 applicable records, there was no evidence of weekend and/or holiday telephone rounds.	×					

Finding	Closed	Open: Adequate evidence of in- service training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met.	Open: Adequate evidence of in-service training was provided, however there were no applicable episodes available for review.	Open: Adequate evidence of in-service training was provided, however institutional monitoring was inadequate and a level of compliance could not be determined.	Open: Adequate evidence of in- service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met.	Other
<u>Consultations</u>	×					
PH-12: In 4 records, the						
diagnosis was not recorded						
on the problem list.						
Consultations		×				
PH-13: In 3 of 15 applicable						
records, there was no						
evidence that follow-up						
appointments were						
completed per the						
consultant's						
recommendations.	×					
Intra-System Transfers	*					
PH-14: In 4 of 18 records						
reviewed, there was no evidence the clinician						
reviewed the record within						
7 days of arrival.						
Medication	×					
Administration						
PH-15: In 4 of 12 records						
reviewed, there was no						
evidence that all medication						
orders had a corresponding						
clinician note.						
Inmate Requests		×				
PH-16: In 4 of 15 applicable		·				
records (16 reviewed), the						
outcome did not occur as						
intended.						

Finding	Closed	Open: Adequate evidence of in- service training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met.	Open: Adequate evidence of in-service training was provided, however there were no applicable episodes available for review.	Open: Adequate evidence of in-service training was provided, however institutional monitoring was inadequate and a level of compliance could not be determined.	Open: Adequate evidence of in- service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met.	Other
Dental Systems PH-17: There was no evidence that necessary equipment was available and in working order.	×					
Dental Clinic PH-18: In 1 of 4 applicable records, there was no evidence follow-up appointments were completed in a timely manner.	×					
Dental Clinic PH-19: In 1 of 2 applicable records, there was no evidence consultant's treatment recommendations were incorporated into the treatment plan.	×					
Pill Line PH-20: There was no evidence that an oral cavity check was completed by nursing staff.	×					
Institutional Tour PH-21: There were no eye wash stations in the medical unit.	×					

Finding	Closed	Open: Adequate evidence of in- service training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met.	Open: Adequate evidence of in-service training was provided, however there were no applicable episodes available for review.	Open: Adequate evidence of in-service training was provided, however institutional monitoring was inadequate and a level of compliance could not be determined.	Open: Adequate evidence of in- service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met.	Other
Institutional Tour PH-22: The otoscope/ophthalmoscope in the trauma/emergency	×					
room did not work.  Institutional Tour PH-23: The over-the-	×					
counter medications logs were not current.						
Institutional Tour PH-24: Access to sick call posters in Spanish were not posted in the dorms.	×					
Additional Administrative Issues PH-25: Medical records were disorganized.	×					

# **B.** Annex Unit

The CAP closure files revealed sufficient evidence to determine that 23 of the 29 physical health findings were corrected. Six physical health findings will remain open.

Finding	Closed	Open: Adequate evidence of inservice training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met.	Open: Adequate evidence of in-service training was provided, however there were no applicable episodes available for review.	Open: Adequate evidence of in-service training was provided, however institutional monitoring was inadequate and a level of compliance could not be determined.	Open: Adequate evidence of in-service training was provided, however institutional monitoring indicated an acceptable level of compliance had not	Other
					been met.	
Chronic Illness Clinic PH-1: In 3 records, the baseline information was incomplete or missing.	×					
Chronic Illness Clinic PH-2: In 6 records, there was no evidence that inmates were seen	×					
Endocrine Clinic PH-3: In 2 of 8 applicable records, there was no evidence of the annual fundoscopic examination.	×					
Endocrine Clinic PH-4: In 3 of 12 applicable records, there was no evidence of pneumococcal vaccination or refusal.				×		
Endocrine Clinic PH-5: In 4 of 10 applicable records, there was no evidence of influenza vaccination or refusal.	×					

Finding	Closed	Open: Adequate evidence of in- service training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met.	Open: Adequate evidence of in-service training was provided, however there were no applicable episodes available for review.	Open: Adequate evidence of in-service training was provided, however institutional monitoring was inadequate and a level of compliance could not be determined.	Open: Adequate evidence of in- service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met.	Other
Gastrointestinal Clinic PH-6: In 2 of 4 applicable records, there was no evidence that inmates with known or suspected cirrhosis were screened for				×		
hepatocellular cancer annually.  Gastrointestinal Clinic	×					
PH-7: In 4 of 8 applicable records, there was no evidence of influenza vaccination or refusal.						
Immunity Clinic PH-8: In 1 of 4 applicable records, there was no evidence that abnormal labs were addressed timely.	×					
Immunity Clinic PH-9: In 3 of 10 applicable records, there was no evidence of influenza vaccination or refusal.	×					
Tuberculosis Clinic PH-10: In 1 of 5 records reviewed, there was no evidence the inmate received the correct number of doses of Isoniazid.	×					

Finding	Closed	Open: Adequate evidence of inservice training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met.	Open: Adequate evidence of in-service training was provided, however there were no applicable episodes available for review.	Open: Adequate evidence of in-service training was provided, however institutional monitoring was inadequate and a level of compliance could not be determined.	Open: Adequate evidence of in- service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met.	Other
Sick Call PH-11: In 3 of 11 applicable records (18 reviewed), follow-up appointments were not completed as required.		×				
Emergency Care PH-12: In 2 of 8 applicable records (17 reviewed), follow-up appointments were not completed as required.	×					
Consultations PH-13: In 2 of 10 applicable records, there was no evidence that the consultation request was completed timely.	×					
Consultations PH-14: In 3 records, there was no evidence that the clinician entered an incidental note documenting the consultant's recommendations.	×					
Consultations PH-15: In 7 records, the diagnosis was not recorded on the problem list.	×					

Finding	Closed	Open: Adequate evidence of in- service training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met.	Open: Adequate evidence of in-service training was provided, however there were no applicable episodes available for review.	Open: Adequate evidence of in-service training was provided, however institutional monitoring was inadequate and a level of compliance could not be determined.	Open: Adequate evidence of in- service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met.	Other
Consultations		×				
PH-16: In 4 of 10 applicable						
records, the consultant's						
treatment						
recommendations were not						
incorporated into the treatment plan.						
Consultations		×				
PH-17: In 3 of 8 applicable		^				
records, there was no						
evidence of follow-up						
diagnostic testing.						
Consultations	×					
PH-18: In 4 records, the						
consultation log was						
incomplete or inaccurate.						
Consultations	×					
PH-19: In 1 of 1 applicable						
record, the alternative						
treatment plan (ATP) was						
not documented in the						
medical record.						
Consultations	×					
PH-20: In 1 of 1 applicable						
record, the ATP was not						
implemented.						
Medical Inmate Requests	×					
PH-21: In 3 of 9 applicable						
records (15 reviewed), the						
response to the inmate						
request did not occur as						
intended.						

Finding	Closed	Open: Adequate evidence of inservice training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met.	Open: Adequate evidence of in-service training was provided, however there were no applicable episodes available for review.	Open: Adequate evidence of in-service training was provided, however institutional monitoring was inadequate and a level of compliance could not be determined.	Open: Adequate evidence of in- service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met.	Other
Medical Inmate Requests	×					
PH-22: In 2 of 4 applicable						
records (15 reviewed),						
there was no evidence the						
inmate was referred to the						
clinician as intended.						
Dental Systems	×					
PH-23: Preventive						
dentistry/oral hygiene						
posters were not displayed						
in the dental clinic.						
Dental Record Review	×					
PH-24: In 4 records, there						
was no evidence of a head						
and neck examination.	×					
Dental Record Review	^					
PH-25: In 3 of 15 applicable						
records, there was no evidence of an accurate						
diagnosis and treatment plan.						
Institutional Tour		×				
PH-26: Over-the-counter		, ·				
medications were not						
available in all dormitory						
areas.						
Additional Administrative	×					
Issues						
PH-27: Nursing staff were						
unable to explain the						
procedure for handling a						
known or suspected case						
of tuberculosis.						

Finding	Closed	Open: Adequate evidence of inservice training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met.	Open: Adequate evidence of in-service training was provided, however there were no applicable episodes available for review.	Open: Adequate evidence of in-service training was provided, however institutional monitoring was inadequate and a level of compliance could not be determined.	Open: Adequate evidence of in- service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met.	Other
<b>Additional Administrative</b>	×					
<u>Issues</u>						
PH-28: Medical records						
were disorganized.						
<b>Additional Administrative</b>	×					
<u>Issues</u>						
PH-29: Inmates with a						
history of cancer or active						
malignancy were not						
enrolled in the oncology						
clinic.						

# III. Mental Health Assessment Summary

# A. Main Unit

The CAP closure files revealed sufficient evidence to determine that 7 of the 23 mental health findings were corrected. Sixteen mental health findings will remain open.

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Finding	Closed	Open: Adequate evidence of in- service training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met.	Open: Adequate evidence of in-service training was provided, however there were no applicable episodes available for review.	Open: Adequate evidence of in-service training was provided, however institutional monitoring was inadequate and a level of compliance could not be determined.	Open: Adequate evidence of in-service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met.	Other
Self-harm Observation		×				
<u>Status</u>						
MH-1: In 2 records, the						
"Infirmary Admission						
Nursing Evaluation" (DC4-						
732) was not completed as						
required.						
Self-harm Observation Status				×		
MH-2: In 1 of 5 applicable						
records, the guidelines for						
SHOS management were not observed.						
					X	
Use of Force MH-3: In 1 of 4 applicable					^	
records (7 reviewed), there						
was no follow-up care when						
indicated.						
Inmate Requests	×					
MH-4: In 6 records, a copy						
of the inmate request form						
was not present in the						
medical record.						

Finding	Closed	Open: Adequate evidence of inservice training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met.	Open: Adequate evidence of in-service training was provided, however there were no applicable episodes available for review.	Open: Adequate evidence of in-service training was provided, however institutional monitoring was inadequate and a level of compliance could	Open: Adequate evidence of in-service training was provided, however institutional monitoring indicated an acceptable level of	Other
				not be determined.	compliance had not been met.	
Inmate Requests	×					
MH-5: In 3 of 12 applicable						
records, a referral did not						
occur as intended in						
response to an inmate						
request.						
Special Housing	×					
MH-6: In 3 records, the						
"Special Housing Health						
Appraisal" (DC4-769) was						
incomplete or missing.						
Special Housing		X				
MH-7: In 3 of 9 applicable						
records, psychotropic						
medications were not						
continued as ordered while						
the inmate was in special						
housing.						
Outpatient Mental Health	×					
<u>Services</u>						
MH-8: In 4 records, the S-						
grade in the medical record						
did not match the S-grade						
in OBIS.						
Outpatient Mental Health		X				
<u>Services</u>						
MH-9: In 1 of 4 applicable						
records, psychotropic						
medications were not						
continued upon the						
inmate's arrival.						

Finding	Closed	Open: Adequate evidence of in- service training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met.	Open: Adequate evidence of in-service training was provided, however there were no applicable episodes available for review.	Open: Adequate evidence of in-service training was provided, however institutional monitoring was inadequate and a level of compliance could not be determined.	Open: Adequate evidence of in- service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met.	Other
Outpatient Mental Health Services  MH-10: In 2 of 4 applicable records, the inmate was not seen by psychiatry prior to the expiration of prescriptions from the sending institution.		X				
Outpatient Mental Health Services  MH-11: In 4 records, individualized service plan (ISP) interventions were not written according to protocol.					Х	
Outpatient Mental Health Services MH-12: In 7 records, the ISP was not signed by all relevant parties. Outpatient Mental Health	×				X	
Services MH-13: In 5 records, problems were not recorded on the problem list. Outpatient Mental Health					X	
Services MH-14: In 7 records, the inmate did not receive the interventions as listed on the ISP.						

Finding	Closed	Open: Adequate evidence of in- service training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met.	Open: Adequate evidence of in-service training was provided, however there were no applicable episodes available for review.	Open: Adequate evidence of in-service training was provided, however institutional monitoring was inadequate and a level of compliance could not be determined.	Open: Adequate evidence of in- service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met.	Other
Psychotropic Medication					X	
<u>Practices</u>						
MH-15: In 2 of 8 applicable						
records, follow-up						
laboratory studies were not						
conducted as required.						
Psychotropic Medication		×				
<u>Practices</u>						
MH-16: In 15 records, the						
inmate did not receive						
medication as prescribed.						
Psychotropic Medication		X				
<u>Practices</u>						
MH-17: In 15 records,						
follow-up psychiatry						
services were not						
conducted at appropriate						
intervals.						
Psychotropic Medication		X				
<u>Practices</u>						
MH-18: In 3 of 4 applicable						
records, the Abnormal						
Involuntary Movements						
Scale (AIMS) was not						
completed as required.						
Psychotropic Medication			×			
<u>Practices</u>						
MH-19: In 1 of 1 applicable						
record, the rationale for						
Emergency Treatment						
Order (ETO) was not						
clearly documented.						

Finding	Closed	Open: Adequate evidence of in- service training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met.	Open: Adequate evidence of in-service training was provided, however there were no applicable episodes available for review.	Open: Adequate evidence of in-service training was provided, however institutional monitoring was inadequate and a level of compliance could not be determined.	Open: Adequate evidence of in- service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met.	Other
Psychotropic Medication			×			
<u>Practices</u>						
MH-20: In 1 of 1 applicable						
record, an order for						
medications without inmate						
consent was not						
documented as an ETO.						
Psychotropic Medication			×			
Practices						
MH-21: In 1 of 1 applicable						
record, there was no documentation that the						
ETO was administered in						
the least restrictive manner.						
Aftercare Planning	×					
MH-22: In 5 of 11 records						
reviewed, consent for						
aftercare was not obtained						
within 30 days of expiration						
of sentence (EOS).						
<b>Additional Administrative</b>	×					
<u>Issues</u>						
MH-23: Medical records						
were disorganized.						
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# **B. Annex Unit**

The CAP closure files revealed sufficient evidence to determine that 19 of the 21 mental health findings were corrected. Two mental health findings will remain open.

Finding	Closed	Open: Adequate evidence of inservice training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met.	Open: Adequate evidence of in-service training was provided, however there were no applicable episodes available for review.	Open: Adequate evidence of in-service training was provided, however institutional monitoring was inadequate and a level of compliance could not be determined.	Open: Adequate evidence of in-service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met.	Other
Self-harm Observation Status MH-1: In 2 records, an emergency evaluation was not completed by mental health or nursing staff prior to an SHOS admission.	×					
Self-harm Observation Status  MH-2: In 1 record, the order for SHOS was incomplete.						
Self-harm Observation Status  MH-3: In 1 record, the "Infirmary Admission Nursing Evaluation" (DC4- 732) was not completed as required.	×					
Self-harm Observation Status MH-4: In 1 record, the inmate was not observed at the frequency ordered by the clinician.		×				

Finding	Closed	Open: Adequate evidence of in- service training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met.	Open: Adequate evidence of in-service training was provided, however there were no applicable episodes available for review.	Open: Adequate evidence of in-service training was provided, however institutional monitoring was inadequate and a level of compliance could not be determined.	Open: Adequate evidence of in- service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met.	Other
Self-harm Observation Status	×					
MH-5: In 2 records, the						
"Inpatient Mental Health						
Daily Nursing Evaluation"						
(DC4-673B) was not						
completed as required.						
Self-harm Observation Status	×					
MH-6: In 1 record, the						
attending clinician did not						
interview the inmate on the						
day of discharge.	×					
Self-harm Observation Status	^					
MH-7: In 1 record, mental						
health staff did not provide post-discharge follow-up						
within 7 days.						
Use of Force MH-8: In 2 of 4 records	×					
reviewed, the post use of						
force exam was not						
completed.						
Special Housing	×					
MH-9: In 7 records, the						
initial mental status						
examination (MSE) was not						
completed within the						
required time frame.						

Finding	Closed	Open: Adequate evidence of inservice training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met.	Open: Adequate evidence of in-service training was provided, however there were no applicable episodes available for review.	Open: Adequate evidence of in-service training was provided, however institutional monitoring was inadequate and a level of compliance could not be determined.	Open: Adequate evidence of in- service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met.	Other
Special Housing MH-10: In 5 of 7 applicable records, the follow-up MSE was not completed.	×					
Special Housing MH-11: In 8 records, outpatient treatment did not continue while the inmate was in special housing.	×					
Outpatient Mental Health Services MH-12: In 4 of 15 applicable records, the inmate was not interviewed by mental health staff within 14 days of arrival.	×					
Outpatient Mental Health Services  MH-13: In 4 records, the bio-psychosocial assessment (BPSA) was not present in the record.		×				
Outpatient Mental Health Services MH-14: In 4 records, the Individualized Service Plan (ISP) was not signed by all relevant parties.	×					

Finding	Closed	Open: Adequate evidence of in- service training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met.	Open: Adequate evidence of in-service training was provided, however there were no applicable episodes available for review.	Open: Adequate evidence of in-service training was provided, however institutional monitoring was inadequate and a level of compliance could not be determined.	Open: Adequate evidence of in- service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met.	Other
Outpatient Mental Health	×					
Services MH-15: In 3 of 14						
applicable records, the ISP						
was not reviewed or						
revised per protocol.						
Outpatient Mental Health Services	×					
MH-16: In 4 records, problems were not						
recorded on the problem						
list.						
Outpatient Psychotropic	×					
<b>Medication Practices</b>						
MH-17: In 9 of 18 records						
reviewed, the inmate did						
not receive medication as						
prescribed.	×					
Aftercare Planning MH-18: In 3 records,	^					
aftercare plans were not						
addressed on the ISP for						
inmates within 180 days of						
EOS.	×					
Aftercare Planning	^					
MH-19: In 1 of 5 applicable records, a "Summary of						
Outpatient Mental Health						
Care" (DC4-657) was not						
completed for inmates						
within 30 days of EOS.						

Finding	Closed	Open: Adequate evidence of inservice training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met.	Open: Adequate evidence of in-service training was provided, however there were no applicable episodes available for review.	Open: Adequate evidence of in-service training was provided, however institutional monitoring was inadequate and a level of compliance could not be determined.	Open: Adequate evidence of in- service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met.	Other
Mental Health Systems MH-20: Psychiatric restraint training was not provided to medical, nursing, and mental health staff.	×					
Mental Health Systems MH-21: One hour of accrued clinical supervision was not provided to each mental health professional weekly.	×					

#### **IV. Conclusion**

### **Physical Health-Main Unit**

The following physical health findings will close: PH-2, PH-5, PH-6, PH-7, PH-8, PH-10, PH-11, PH-12, PH-14, PH-15, PH-17, PH-18, PH-19, PH-20, PH-21, PH-22, PH-23, PH-24, and PH-25. All other physical health findings will remain open.

### **Physical Health-Annex Unit**

The following physical health findings will close: PH-1, PH-2, PH-3, PH-5, PH-7, PH-8, PH-9, PH-10, PH-12, PH-13, PH-14, PH-15, PH-18, PH-19, PH-20, PH-21, PH-22, PH-23, PH-24, PH-25, PH-27, PH-28 and PH-29. All other physical health findings will remain open.

#### **Mental Health-Main Unit**

The following mental health findings will close: MH-4, MH-5, MH-6, MH-8, MH-13, MH-22, and MH-23. All other mental health findings will remain open.

#### **Mental Health-Annex Unit**

The following mental health findings will close: MH-1, MH-2, MH-3, MH-5, MH-6, MH-7, MH-8, MH-9, MH-10, MH-11, MH-12, MH-14, MH-15, MH-16, MH-17, MH-18, MH-19, MH-20 and MH-21. All other mental health findings will remain open.

Until appropriate corrective actions are undertaken by COLCI staff and the results of those corrections reviewed by the CMA, this CAP will remain open. As some of the necessary steps to correct findings require further institutional monitoring, closure may take as long as three months. Follow-up assessment by the CMA will most likely take place through an on-site evaluation.