SECOND ON-SITE CORRECTIVE ACTION PLAN ASSESSMENT

of

LOWELL CORRECTIONAL INSTITUTION

for the

Physical and Mental Health Survey Conducted February 18 -19, 2015

CMA STAFF

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CAP Assessment of Lowell Correctional Institution

I. Overview

On February 18-19, 2015, the Correctional Medical Authority (CMA) conducted an on-site physical and mental health survey of Lowell Correctional Institution (LOWCI). The survey report was distributed on March 26, 2015. In April of 2015, LOWCI submitted and the CMA approved, the institutional corrective action plan (CAP) which outlined the efforts to be undertaken to address the findings of the February 2015 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.

On July 27, 2015, CMA staff requested access to monitoring documents to assist in determining if an on-site or off-site assessment should be conducted. Based on the documents provided, CMA staff conducted an on-site CAP assessment on August 26 & 27, 2015 to evaluate the effectiveness of corrective actions taken by institutional staff. The CAP closure files revealed sufficient evidence to determine that on the Main Unit, 22 of 46 physical health findings and 21 of 28 mental health findings were corrected. On the Annex, 24 of 55 physical health findings and 20 of 32 mental health findings were corrected. Additional physical health findings, 3 on the Main Unit and 1 on the Annex, were added for in-service training, monitoring, and corrective action.

On November 2, 2015 CMA staff requested access to monitoring documents to assist in determining if an on-site or off-site assessment should be conducted. Based on the documents provided, CMA staff conducted an on-site CAP assessment on December 15 & 16, 2015 to evaluate the effectiveness of corrective actions taken by institutional staff. Items II and III below describe the outcome of the CMA's evaluation of the institution's efforts to address the survey findings.

II. Physical Health Assessment Summary

A. Main Unit

The CAP closure files revealed sufficient evidence to determine that 6 of 27 physical health findings were corrected. Twenty-one physical health findings will remain open and one finding will be added for in-service training, monitoring, and corrective action.

Finding	CAP Evaluation Outcome
CARDIOVASCULAR CLINIC	PH-2 OPEN
PH-2: In 4 of 13 applicable records (18 reviewed), there was no evidence that abnormal laboratory results were addressed.	Adequate evidence of in-service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met. PH-2 will remain open.

Finding	CAP Evaluation Outcome
ENDOCRINE CLINIC	PH-4 OPEN
A comprehensive review of 16 records revealed the following deficiencies:	Adequate evidence of in-service training was provided, however a review of randomly selected records
PH-4: In 4 records, the physical examination was incomplete or missing.	indicated an acceptable level of compliance had not been met. PH-4 will remain open.
PH-5: In 6 of 10 applicable records, there was no evidence of the annual fundoscopic examination.	PH-5, PH-6 & PH-7 OPEN
PH-6: In 2 of 7 applicable records, aspirin therapy was not initiated for inmates with vascular disease or other risk factors.	Adequate evidence of in-service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met. PH-5, PH-6 & PH-7 will
PH-7: In 2 of 9 applicable records, ACE/ARB therapy was not initiated for diabetic inmates experiencing hypertension.	remain open.

Finding	CAP Evaluation Outcome
GASTROINTESTINAL CLINIC	PH-10 OPEN
A comprehensive review of 17 records revealed the following deficiencies:	Adequate evidence of in-service training was provided, however institutional monitoring indicated an
PH-10: In 4 of 16 applicable records, there was no evidence that hepatitis A & B vaccines were given to inmates with	acceptable level of compliance had not been met. PH-10 will remain open.
hepatitis C infection and no prior history of A & B infection.	PH-11 OPEN
PH-11: In 1 of 3 applicable records, there was no referral to a specialist although indicated.	Adequate evidence of in-service training was provided, however there were no applicable episodes available for review. PH-11 will remain open.

Finding	CAP Evaluation Outcome
NEUROLOGY CLINIC	PH-15 OPEN
PH-15: In 13 of 13 applicable records (14 reviewed), seizures were not classified.	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. PH-15 will remain open.

Finding	CAP Evaluation Outcome
ONCOLOGY CLINIC	PH-16 CLOSED
A comprehensive review of 4 records revealed the following deficiencies: PH-16: In 1 record, there was no evidence of an appropriate physical examination.	Adequate evidence of in-service training and documentation of correction were provided to close PH-16.
PH-17: In 2 records, the evaluation of the control of the disease and patient status was not documented. PH-20: In 1 record, there was no referral to a specialist although indicated.	PH-17 & PH-20 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. PH-17 & PH-20 will remain open.

Finding	CAP Evaluation Outcome
TUBERCULOSIS CLINIC	PH-22, PH-23, & PH-24 CLOSED
A comprehensive review of 17 records revealed the following deficiencies:	Adequate evidence of in-service training and documentation of correction were provided to close
PH-22: In 6 records, the diagnosis was not recorded on the problem list.	PH-22, PH-23, & PH-24.
PH-23: In 1 of 5 applicable records, there was no evidence of pneumococcal vaccine or refusal.	

Finding	CAP Evaluation Outcome
PH-24: In 1 of 4 applicable records, there was no evidence of influenza vaccine or refusal.	

Finding	CAP Evaluation Outcome
INFIRMARY	PH-26, PH-27, & PH-28 OPEN
A comprehensive review of 12 records revealed the following deficiencies: PH-26: In 3 records, there was no evidence that all orders were implemented.	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. PH-26, PH-27, & PH-28 will remain open.
PH-27: In 5 of 10 applicable records, there was no evidence of a discharge note. PH-28: In 4 of 6 applicable records, there was no evidence that inmates on 23-hour observation status were evaluated within 30 minutes of admission.	PH-29 CLOSED Adequate evidence of in-service training and documentation of correction were provided to close PH-29.
PH-29: In 5 of 6 applicable records, nursing evaluations were not documented at least every eight hours for inmates on 23-hour observation status.	

Finding	CAP Evaluation Outcome
INTRA-SYSTEM TRANSFERS	PH-33 OPEN
A comprehensive review of 18 records revealed the following deficiencies: PH-33: In 1 of 5 applicable records, the CIC visit did not take place as indicated.	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. PH-33 will remain open.

Finding	CAP Evaluation Outcome
PH-34: In 5 records, there was no evidence that the clinician reviewed the health record and the DC4-760A "Health Information Transfer/Arrival Summary" within 7 days of arrival.	PH-34 OPEN Adequate evidence of in-service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met. PH-34 will remain open.

Finding	CAP Evaluation Outcome
MEDICAL INMATE REQUESTS	PH-35 CLOSED
A comprehensive review of 18 records revealed the following deficiencies: PH-35: In 4 of 15 applicable records, there was no incidental note contained in the medical record that the request was received.	Adequate evidence of in-service training and documentation of correction were provided to close PH-35. PH-36 OPEN
PH-36: In 5 of 14 applicable records, there was no documentation that the interview, appointment, and/or test occurred as intended.	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. PH-36 will remain open.

Finding	CAP Evaluation Outcome
PERIODIC SCREENINGS PH-38: In 1 of 4 applicable records (13	PH-38 OPEN Adequate evidence of in-service
reviewed), there was no referral to a clinician although indicated.	training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met. PH-38 will remain open.

Finding	CAP Evaluation Outcome
ADDITIONAL ADMINISTRATIVE ISSUES	PH-44 OPEN
PH-44: Inmates with a history of malignancy were not followed in the oncology clinic.	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. PH-44 will remain open.

Finding	CAP Evaluation Outcome
CHRONIC ILLNESS CLINICS (CIC)	CF-1 OPEN
CF-1: In 10 of 10 records reviewed, CIC documentation was incomplete.	Adequate evidence of in-service training was provided, however institutional monitoring was insufficient. CF-1 will remain open.

Finding	CAP Evaluation Outcome
CONSULTATIONS	CF-2 OPEN
CF-2: In 4 of 8 records reviewed, consultations and/or specialty services follow-up was not completed timely.	Insufficient evidence of in-service training and monitoring were provided. CF-2 will remain open.

Finding	CAP Evaluation Outcome
PERIODIC SCREENINGS	CF-3 OPEN
CF-3: In 6 of 6 records reviewed, the periodic screening did not contain all of the required components.	Adequate evidence of in-service training was provided, however institutional monitoring was insufficient. CF-3 will remain open.

Finding	CAP Evaluation Outcome
CHRONIC ILLNESS CLINICS CF-4: In 7 of 10 records reviewed, inmates were seen at intervals less frequently than required by their M-grade classification.	Provide in-service training to staff regarding the issue(s) identified in the Finding(s) column. Create a monitoring tool and conduct biweekly monitoring of no less than ten applicable records to evaluate the effectiveness of corrections. Continue monitoring until closure is affirmed through the CMA corrective action plan assessment.

B. Annex

The CAP closure files revealed sufficient evidence to determine that 11 of the 32 physical health findings were corrected. Twenty-one physical health findings will remain open and one physical health finding was added for in-service training, monitoring, and corrective action.

Finding	CAP Evaluation Outcome
CHRONIC ILLNESS CLINIC RECORD REVIEW	PH-2 CLOSED
A comprehensive review of 15 records revealed the following deficiencies:	Adequate evidence of in-service training and documentation of correction were provided to close PH-2.
PH-2: In 9 records, baseline information was incomplete or missing.	PH-3 & PH-4 OPEN
PH-3: In 4 records, inmates were not seen as often as the clinician determined necessary or were seen at intervals greater than 365 days.	Adequate evidence of in-service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met. PH-3 & PH-4 will
PH-4: In 4 records, there was no evidence labs were available to the clinician or reviewed prior to clinic visits.	remain open. PH-5 CLOSED
PH-5: In 7 records, CIC forms and progress notes were not complete, legible, dated, timed, signed and/or signature stamped.	Adequate evidence of in-service training and documentation of correction were provided to close PH-5.

Finding	CAP Evaluation Outcome
ENDOCRINE CLINIC	PH-6 OPEN
A comprehensive review of 17 records revealed the following deficiencies:	Adequate evidence of in-service training was provided, however a review of randomly selected records
PH-6: In 4 of 13 applicable records, there was no evidence of the annual fundoscopic examination.	indicated an acceptable level of compliance had not been met. PH-6 will remain open.
PH-7: In 4 of 9 applicable records, there was no evidence that patients with HbA1c	PH-7 & PH-8 OPEN
over 8.0 were seen every 3 months.	Adequate evidence of in-service training was provided, however
PH-8: In 3 of 12 applicable records, ACE/ARB therapy was not initiated for diabetic inmates experiencing hypertension.	institutional monitoring indicated an acceptable level of compliance had not been met. PH-7 & PH-8 will remain open.

Finding	CAP Evaluation Outcome
GASTROINTESTINAL CLINIC	PH-9 CLOSED
A comprehensive review of 17 records revealed the following deficiencies:	Adequate evidence of in-service training and documentation of correction were provided to close
PH-9: In 5 records, there was no evidence that inmates had an annual urinalysis.	PH-9. PH-10, PH-11, & PH-12 OPEN
PH-10: In 9 of 12 applicable records, there was no evidence that hepatitis A & B vaccines were given to inmates with hepatitis C infection and no prior history of A & B infection.	Adequate evidence of in-service training was provided, however institutional monitoring indicated an acceptable level of compliance had
PH-11: In 3 of 13 applicable records, there was no evidence of pneumococcal vaccine or refusal.	not been met. PH-10, PH-11, & PH-12 will remain open.
PH-12: In 4 records, there was no evidence of influenza vaccine or refusal.	

Finding	CAP Evaluation Outcome
MISCELLANEOUS CLINIC	PH-14 CLOSED
PH-14: In 3 of 13 records reviewed, there was no evidence of pneumococcal vaccine or refusal.	Adequate evidence of in-service training and documentation of correction were provided to close PH-14.

Finding	CAP Evaluation Outcome
IMMUNITY CLINIC	PH-15 & PH-16 CLOSED
A comprehensive review of 14 records revealed the following deficiencies:	Adequate evidence of in-service training and documentation of correction were provided to close
PH-15: In 6 records, there was no evidence of hepatitis B vaccine or refusal.	PH-15 & PH-16.
PH-16: In 3 records, there was no evidence of influenza vaccine or refusal.	

Finding	CAP Evaluation Outcome
NEUROLOGY CLINIC	PH-18 OPEN
PH-18: In 4 of 13 applicable records (16 reviewed), there was no evidence that abnormal labs were addressed in a timely manner.	Adequate evidence of in-service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met. PH-18 will remain open.

Finding	CAP Evaluation Outcome
ONCOLOGY CLINIC	PH-21 OPEN
PH-21: In 1 of 4 records reviewed, there was no referral to a specialist although indicated.	Adequate evidence of in-service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met. PH-21 will remain open.

Finding	CAP Evaluation Outcome
RESPIRATORY CLINIC	PH-22 OPEN
PH-22: In 11 of 13 records reviewed, there was no evidence that reactive airway disease was classified as mild, moderate, or severe.	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. PH-22 will remain open.

Finding	CAP Evaluation Outcome
TUBERCULOSIS CLINIC	PH-23 OPEN
A comprehensive review of 7 records revealed the following deficiencies:	Adequate evidence of in-service training was provided, however a review of randomly selected records
PH-23: In 4 records, the diagnosis was not recorded on the problem list.	indicated an acceptable level of compliance had not been met. PH-23 will remain open.
PH-25: In 4 records, there was no documentation of monthly nursing follow-up.	PH-25 CLOSED
PH-26: In 3 records, there was no evidence the correct number of doses of INH were given.	Adequate evidence of in-service training and documentation of correction were provided to close PH-25.

Finding	CAP Evaluation Outcome
	PH-26 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. PH-26 will remain open.

Finding	CAP Evaluation Outcome
INFIRMARY	PH-28, PH-29, & PH-30 CLOSED
A comprehensive review of 15 records revealed the following deficiencies:	Adequate evidence of in-service training and documentation of correction were provided to close
PH-28: In 5 records, there was no evidence the clinician provided complete and appropriate care orders.	PH-28, PH-29, & PH-30.
PH-29: In 6 records, there was no evidence of a discharge note.	
PH-30: In 3 records, the separate inpatient chart was incomplete.	

Finding	CAP Evaluation Outcome
CONSULTATIONS	PH-33 & PH-34 OPEN
A comprehensive review of 15 records revealed the following deficiencies: PH-33: In 3 records, there was no	Adequate evidence of in-service training was provided, however a review of randomly selected records indicated an acceptable level of
evidence that the consultation occurred timely.	compliance had not been met. PH-33 & PH-34 will remain open.
PH-34: In 11 records, the diagnosis was not reflected on the problem list.	

Finding	CAP Evaluation Outcome
INTRA-SYSTEM TRANSFERS	PH-36 & PH-37 OPEN
A comprehensive review of 13 records revealed the following deficiencies: PH-36: In 2 of 6 applicable records, inmates assigned to chronic illness clinics	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. PH-36
were not seen as scheduled or as necessary upon transfer.	& PH-37 will remain open.
PH-37: In 6 records, the there was no evidence the clinician reviewed the inmate's health record within 7 days.	

Finding	CAP Evaluation Outcome
MEDICAL INMATE REQUESTS	PH-40 OPEN
PH-40: In 5 of 12 applicable records (17 reviewed), there was no documentation that the interview, appointment, callout, and/or test occurred as intended.	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. PH-40 will remain open.

Finding	CAP Evaluation Outcome
MEDICATION ADMINISTRATION RECORD REVIEW PH-41: In 1 of 2 applicable records, there was no evidence of counseling after missing three consecutive doses of medications.	PH-41 CLOSED Adequate evidence of in-service training and documentation of correction were provided to close PH-41.

Finding	CAP Evaluation Outcome
PERIODIC SCREENINGS	PH-42 OPEN
A comprehensive review of 15 records revealed the following deficiencies: PH-42: In 3 records, the screening encounter did not occur within one month	Adequate evidence of in-service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met. PH-42 will remain open.
of the due date.	PH-43 OPEN
PH-44: In 6 records, there was no evidence required diagnostic tests were performed 7-14 days prior to the screening.	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. PH-43 will remain open.

Finding	CAP Evaluation Outcome
CHRONIC ILLNESS CLINICS (CIC)	CF-1 OPEN
CF-1: In 10 of 10 records reviewed, the physical examinations did not contain all of the required components.	Adequate evidence of in-service training was provided, however institutional monitoring was insufficient. CF-1 will remain open.

Finding	CAP Evaluation Outcome
CHRONIC ILLNESS CLINICS CF-2: In 5 of 10 records reviewed, inmates were seen at intervals less frequently than required by their M-grade classification.	Provide in-service training to staff regarding the issue(s) identified in the Finding(s) column. Create a monitoring tool and conduct biweekly monitoring of no less than ten applicable records to evaluate the effectiveness of corrections. Continue monitoring until closure is affirmed through the CMA corrective action plan assessment.

III. Mental Health Assessment Summary

A. Main Unit

The CAP closure files revealed sufficient evidence to determine that 1 of 7 mental health findings were corrected. Six mental health findings will remain open.

Finding	CAP Evaluation Outcome
USE OF FORCE	MH-3 CLOSED
MH-3: In 4 of 7 records reviewed, a written referral to mental health by physical health staff was not present.	Adequate evidence of in-service training and documentation of correction were provided to close MH-3.

OUTPATIENT PSYCHOTROPIC MEDICATION PRACTICES A comprehensive review of 19 outpatient records revealed the following deficiencies: MH-8: In 8 of 13 applicable records, followup lab tests were not completed as required. MH-11: In 3 of 15 applicable records, there was no evidence the nurse met with inmates who refused medication for 2 consecutive days. MH-12: In 1 of 3 applicable records, there was no DC4-711A "Refusal of Health Care Services" after 3 consecutive medication refusals or 5 in one month. MH-14: In 8 records, follow-up psychiatric contacts were not conducted at appropriate intervals. MH-8 OPEN Adequate evidence of in-service training was provided, however indicated an acceptable level of compliance had not been met. MH-14 open Adequate evidence of in-service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met. MH-11, MH-12, & MH-14 will remain open.

Finding	CAP Evaluation Outcome
OUTPATIENT MENTAL HEALTH SERVICES A comprehensive review of 17 outpatient records revealed the following deficiencies: MH-19: In 5 of 15 applicable records, the ISP was not signed by a member or members of the multidisciplinary treatment team (MDST) and/or inmate or a refusal was not documented on form DC4-711A. MH-20: In 3 of 13 applicable records, the ISP was not reviewed or revised at the 180 day interval.	MH-19 & MH-20 OPEN Adequate evidence of in-service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met. MH-19 & MH-20 will remain open.

B. Annex

The CAP closure files revealed evidence to determine that 7 of 12 mental health findings were corrected. Five mental health findings will remain open

Finding	CAP Evaluation Outcome
SELF-HARM OBSERVATION STATUS (SHOS) MH-8: In 12 of 24 records reviewed, the DC4-673B "Inpatient Mental Health Daily Nursing Evaluation" was not completed once per shift.	MH-8 CLOSED Adequate evidence of in-service training and documentation of correction were provided to close MH-8.

Finding	CAP Evaluation Outcome
USE OF FORCE	MH-11 & MH-12 CLOSED
A comprehensive review of 7 use of force episodes revealed the following deficiencies:	Adequate evidence of in-service training and documentation of correction were provided to close MH-11 & MH-12.
MH-11: In 2 of 2 applicable records, the post use of force physical exam was not completed in its entirety.	
MH-12: In all records, a written referral to mental health by physical health staff was not present.	

Finding	CAP Evaluation Outcome
SPECIAL HOUSING	MH-15 CLOSED
MH-15: In 7 of 8 applicable records (18 reviewed), psychotropic medications were not continued as directed while the inmate was held in special housing.	Adequate evidence of in-service training and documentation of correction were provided to close MH-15.

Finding	CAP Evaluation Outcome
OUTPATIENT PSYCHOTROPIC	MH-18 CLOSED
MEDICATION PRACTICES A comprehensive review of 14 outpatient records revealed the following deficiencies:	Adequate evidence of in-service training and documentation of correction were provided to close MH-18.
MH-18: In 8 of 13 applicable records, the inmate did not receive medications as	MH-19 & MH-20 OPEN
prescribed and documentation of refusal	
was not present in the medical record.	Adequate evidence of in-service training was provided, however
MH-19: In 4 of 6 applicable records, there	institutional monitoring indicated an
was no evidence the nurse met with	acceptable level of compliance had

Finding	CAP Evaluation Outcome
inmates who refused medication for 2 consecutive days.	not been met. MH-19, & MH-20 will remain open.
MH-20: In 4 records, follow-up psychiatric contacts were not conducted at appropriate intervals.	

Finding	CAP Evaluation Outcome
OUTPATIENT MENTAL HEALTH SERVICES	MH-23 OPEN
A comprehensive review of 17 outpatient records revealed the following deficiencies:	Adequate evidence of in-service training was provided, however a review of randomly selected records indicated an acceptable level of
MH-23: In 3 of 8 applicable records, the DC4-760A "Health Information Arrival/Transfer Summary" was	compliance had not been met. MH-23 will remain open.
incomplete or missing.	MH-24 CLOSED
MH-24: In 3 of 4 applicable records, psychiatric medication was not continued upon the inmate's arrival at the institution.	Adequate evidence of in-service training and documentation of correction were provided to close MH-24.
MH-25: In 8 records, the ISP was not signed by the inmate and a refusal was not documented on form DC4-711A.	MH-25 OPEN
MH-26: In 5 records, mental health problems were not recorded on the problem list.	Adequate evidence of in-service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met. MH-25 will remain open.
	MH-26 CLOSED
	Adequate evidence of in-service training and documentation of correction were provided to close MH-26.

Finding	CAP Evaluation Outcome
AFTERCARE PLANNING	MH-28 OPEN
MH-28: In 2 of 10 records, the DC4-661 "Summary of Outpatient Mental Health Care" was not completed within 30 days of end of sentence (EOS).	Adequate evidence of in-service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met. MH-28 will remain open.

IV. Conclusion

Physical Health-Main Unit

The following physical health findings will close: PH-16, PH-22, PH-23, PH-24, PH-29, & PH-35. All other physical health findings will remain open. CF-4 will be added for inservice training, monitoring, and corrective action.

Physical Health-Annex

The following physical health findings will close: PH-2, PH-5, PH-9, PH-14, PH-15, PH-16.

PH-25, PH-28, PH-29, PH-30, & PH-41. All other physical health findings will remain open. CF-2 will be added for in-service training, monitoring, and corrective action.

Mental Health-Main Unit

The following mental health findings will close: MH-3. All other mental health findings will remain open.

Mental Health-Annex

The following mental health findings will close: MH-8, MH-11, MH-12, MH-15, MH-18, MH-24, & MH-26. All other mental health findings will remain open

Until such time as appropriate corrective actions are undertaken by LOWCI 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.