ON-SITE CORRECTIVE ACTION PLAN ASSESSMENT

of

SUWANNEE CORRECTIONAL INSTITUTION

for the

Physical and Mental Health Survey Conducted February 7-9, 2017

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CAP Assessment of Suwannee Correctional Institution

I. Overview

On February 7-9, 2017, the Correctional Medical Authority (CMA) conducted an on-site physical and mental health survey of Suwannee Correctional Institution (SUWCI). The survey report was distributed on March 8, 2017. In April 2017, SUWCI 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 2017 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 October 9, 2017, 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 October 27, 2017 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 10 of the 20 physical health findings were corrected. Ten physical health findings will remain open.

Finding	CAP Evaluation Outcome
CHRONIC ILLNESS CLINIC RECORD	PH-1 CLOSED
REVIEW	Adequate evidence of in-service
PH-1: In 7 of 15 records reviewed, the	training and documentation of
baseline information was incomplete or	correction were provided to close
missing.	PH-1.

Finding	CAP Evaluation Outcome
IMMUNITY CLINIC RECORD REVIEW	PH-2 CLOSED
PH-2: In 4 of 9 records reviewed, there was no evidence of hepatitis B vaccination or refusal.	Adequate evidence of in-service training and documentation of correction were provided to close PH-2.

Finding	CAP Evaluation Outcome
NEUROLOGY CLINIC RECORD REVIEW	PH-3 & PH-4 CLOSED
A comprehensive review of 12 inmate records revealed the following deficiencies:	Adequate evidence of in-service training and documentation of correction were provided to close PH-3 & PH-4.
PH-3: In 2 of 10 applicable records, annual labs were not completed as required.	
PH-4: In 1 of 2 applicable records, there was no evidence that abnormal labs were addressed timely.	

Finding	CAP Evaluation Outcome
RESPIRATORY CLINIC RECORD REVIEW	PH-5 CLOSED
PH-5: In 6 of 14 records reviewed, reactive airway disease was not classified as mild, moderate, or severe.	Adequate evidence of in-service training and documentation of correction were provided to close PH-5.

Finding	CAP Evaluation Outcome
TUBERCULOSIS CLINIC RECORD REVIEW PH-6: In 3 of 12 records reviewed, laboratory testing was not completed as ordered by the clinician.	PH- 6 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-6 will remain open.

Finding	CAP Evaluation Outcome
INFIRMARY RECORD REVIEW	PH-7 & PH-8 OPEN
 PH-7: In 4 inpatient and outpatient records, the clinician's orders were incomplete. PH-8: In 4 inpatient and outpatient records, there was no evidence that all 	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-7 & PH-8 will remain open.
orders were implemented. PH-9: In 3 of 10 applicable inpatient and outpatient records, there was no evidence	PH-9 & PH-10 OPEN
the discharge note was completed in its entirety.	Adequate evidence of in-service training was provided, however institutional monitoring indicated an
PH-10: In 2 of 2 applicable outpatient records, there was no evidence of weekend or holiday phone rounds.	acceptable level of compliance had not been met. PH-9 & PH-10 will remain open.
PH-11: In 2 of 5 applicable inpatient records, there was no evidence that the	PH-11 & PH-12 OPEN
inmate was evaluated within the required time frame.	Adequate evidence of in-service training was provided, however a review of randomly selected records
PH-12: In 2 of 3 applicable inpatient records, there was no evidence of weekend or holiday phone rounds.	indicated an acceptable level of compliance had not been met. PH-11 & PH-12 will remain open.
PH-13: In 1 of 3 applicable inpatient records, the discharge summary was not	PH-13 OPEN
completed.	Adequate evidence of in-service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met. PH-13 will remain open.

Finding	CAP Evaluation Outcome
CONSULTATIONS RECORD REVIEW	PH-14 OPEN
PH-14: In 6 of 13 records reviewed, the diagnosis was not recorded on the problem list.	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-14 will remain open.

Finding	CAP Evaluation Outcome
INTRA-SYSTEM TRANSFER RECORD	PH-15 CLOSED
REVEW	Adequate evidence of in-service
PH-15: In 6 of 16 records reviewed, there	training and documentation of
was no evidence the clinician reviewed	correction were provided to close
the health record within 7 days.	PH-15.

Finding	CAP Evaluation Outcome
MEDICATION ADMINISTRATION RECORD	PH-16 OPEN
REVIEW	Adequate evidence of in-service
PH-16: In 4 of 12 records reviewed, there	training was provided, however
was no note corresponding to the	institutional monitoring indicated an
medication order written by the	acceptable level of compliance had
prescriber.	not been met. PH-16 will remain open.

Finding	CAP Evaluation Outcome
PERIODIC SCREENINGS	PH-17 CLOSED
PH-17: In 6 of 15 records reviewed, diagnostic and laboratory testing was incomplete or not completed within the required time frame.	Adequate evidence of in-service training and documentation of correction were provided to close PH-17.

Finding	CAP Evaluation Outcome
DENTAL CLINIC RECORD REVIEW	PH-18 CLOSED
PH-18: In 5 of 6 applicable records, consultation or specialty services were not completed timely.	Adequate evidence of in-service training and documentation of correction were provided to close PH-18.

Finding	CAP Evaluation Outcome
DENTAL SYSTEMS	PH-19 & PH-20 CLOSED
PH-19: The prosthodontics tracking mechanism was inadequate.	Adequate evidence of in-service training and documentation of correction were provided to close
PH-20: Medications were dispensed inadequately.	PH-19 & PH-20.

B. Annex

The CAP closure files revealed sufficient evidence to determine that 11 of the 17 physical health findings were corrected. Six physical health findings will remain open.

Finding	CAP Evaluation Outcome
CARDIOVASCULAR CLINIC RECORD REVEWA comprehensive review of 18 records revealed the following deficiencies:PH-1: In 4 records, there was no evidence that annual laboratory work was completed as required.PH-2: In 4 records, there was no evidence that appropriate medications were prescribed and reevaluated at each clinic visit.	PH-1 & PH-2 CLOSED Adequate evidence of in-service training and documentation of correction were provided to close PH-1 & PH-2.

Finding	CAP Evaluation Outcome
ENDROCRINE CLINIC RECORD REVIEW	PH-3, PH-4, & PH-5 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-3: In 2 of 8 applicable records, there was no evidence of an annual fundoscopic examination.	PH-3, PH-4, & PH-5.
PH-4: In 2 of 8 applicable records, there was no evidence of ACE or ARB therapy for diabetics when indicated.	
PH-5: In 3 of 12 applicable records, there was no evidence of pneumococcal vaccination or refusal.	

Finding	CAP Evaluation Outcome
IMMUNITY CLINIC RECORD REVIEW	PH-6 OPEN
A comprehensive review of 14 records revealed the following deficiencies:	Adequate evidence of in-service training was provided, however institutional monitoring indicated an
PH-6: In 3 of 11 applicable records, there was no evidence of hepatitis B vaccination or refusal.	acceptable level of compliance had not been met. PH-6 will remain open.
	PH-7 CLOSED
PH-7: In 9 records, there was no evidence of influenza vaccination or refusal.	Adequate evidence of in-service training and documentation of correction were provided to close PH-7.

Finding	CAP Evaluation Outcome
NEUROLOGY CLINIC RECORD REVIEW	PH-8 CLOSED
PH-8: In 4 of 10 applicable records (13 reviewed), there was no evidence of influenza vaccination or refusal.	Adequate evidence of in-service training and documentation of correction were provided to close PH-8.

Finding	CAP Evaluation Outcome
RESPIRATORY CLINIC RECORD REVIEW	PH-9 OPEN
A comprehensive review of 15 records revealed the following deficiencies:	Adequate evidence of in-service training was provided, however a review of randomly selected records
PH-9: In 9 of 11 applicable records, reactive airway disease was not classified as mild, moderate, or severe.	indicated an acceptable level of compliance had not been met. PH-9 will remain open.
PH-10: In 7 of 14 applicable records, there was no evidence of pneumococcal	PH-10 & PH-11 OPEN
vaccination or refusal.	Adequate evidence of in-service training was provided, however
PH-11: In 3 records, there was no evidence of influenza vaccination or refusal.	institutional monitoring indicated an acceptable level of compliance had not been met. PH-10 & PH-11 will remain open.

Finding	CAP Evaluation Outcome
SICK CALL RECORDS REVIEW	PH-12 CLOSED
PH-12: In 4 of 9 applicable records (17 reviewed), there was no evidence that the follow-up assessment was complete, timely, and/or addressed the condition.	Adequate evidence of in-service training and documentation of correction were provided to close PH-12.

Finding	CAP Evaluation Outcome
INFIRMARY RECORD REVIEW	PH-13 CLOSED
A comprehensive review of 14 records revealed the following deficiencies: PH-13: In 8 inpatient and outpatient	Adequate evidence of in-service training and documentation of correction were provided to close PH-13.
records, there was no evidence that all orders were implemented.	PH-14 OPEN
PH-14: In 7 of 9 inpatient and outpatient applicable records, there was no evidence that the nursing discharge note was completed in its entirety.	Adequate evidence of in-service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met. PH-14 will remain open.

Finding	CAP Evaluation Outcome
CONSULTATIONS RECORD REVIEW PH-15: In 9 of 16 records reviewed, the diagnosis was not recorded on the problem list.	PH-15 CLOSED Adequate evidence of in-service training and documentation of correction were provided to close PH-15.

Finding	CAP Evaluation Outcome
PERIODIC SCREENINGS	PH-16 OPEN
PH-16: In 4 of 15 records reviewed, the diagnostic and laboratory testing was incomplete.	Adequate evidence of in-service training was provided, however institutional monitoring indicated an acceptable level of compliance had not been met. PH-16 will remain open.

Finding	CAP Evaluation Outcome
DENTAL CLINIC REVIEW	PH-17 CLOSED
PH-17: In 6 of 10 applicable records (18 reviewed), there was no evidence that consultation or specialty services were completed timely.	Adequate evidence of in-service training and documentation of correction were provided to close PH-17.

III. Mental Health Assessment Summary

A. Main Unit

The CAP closure files revealed sufficient evidence to determine that 23 of 39 mental health findings were corrected. Sixteen mental health findings will remain open.

Finding	CAP Evaluation Outcome
SELF-HARM OBSERVATION STATUS (SHOS)	MH-1 & MH-2 OPEN Adequate evidence of in-service
A comprehensive review of 16 SHOS admissions revealed the following deficiencies:	training was provided, however a review of randomly selected records indicated an acceptable level of compliance had not been met. MH-1
MH-1: In 8 records, the inmate was not observed at the frequency ordered by the clinician.	& MH-2 will remain open.
MH-2: In 4 records, the nursing evaluation was not completed each shift.	

Finding	CAP Evaluation Outcome
USE OF FORCE	MH-3 & MH-4 CLOSED
A comprehensive review of 9 use of force episodes revealed the following deficiencies:	Adequate evidence of in-service training and documentation of correction were provided to close MH-3 & MH-4.
MH-3: In 3 records, the post use of force exam not present in the medical record.	MH-5 & MH-6 OPEN
MH-4: In 1 of 5 applicable records, the post use of force exam was not completed in its entirety to assess for injuries.	Adequate evidence of in-service training was provided, however a review of randomly selected records indicated an acceptable level of
MH-5: In 2 records, there was no evidence of a written referral by physical health staff to mental health.	compliance had not been met. MH-5 & MH-6 will remain open.
MH-6: In 4 records, there was no indication that mental health staff interviewed the inmate the next working day to determine the level of mental health care needed.	

Finding	CAP Evaluation Outcome
SPECIAL HOUSING	MH-7 & MH-8 CLOSED
A comprehensive review of 15 records of inmates in special housing revealed the following deficiencies:	Adequate evidence of in-service training and documentation of correction were provided to close MH-7 & MH-8.
MH-7: In 3 of 9 applicable records, the "Special Housing Health Appraisal" (DC4- 769) was incomplete or missing.	
MH-8: In 3 records, entries were not dated, timed, stamped and/or signed.	

Finding	CAP Evaluation Outcome
INPATIENT PSYCHOTROPIC MEDICATION PRACTICES	MH-9, MH-10, MH-11, MH-12, MH-13, & MH-14 CLOSED
A comprehensive review of 14 inpatient records revealed the following deficiencies:	Adequate evidence of in-service training and documentation of correction were provided to close
MH-9: In 2 of 7 applicable records, initial lab tests were not completed as required.	MH-9, MH-10, MH-11, MH-12, MH-13, & MH-14.
MH-10: In 10 of 13 applicable records, the inmate did not receive medications as prescribed or documentation of refusal was not present in the medical record.	
MH-11: In 3 of 6 applicable records, there was no evidence the nurse met with inmates who refused medication for 2 consecutive days.	
MH-12: In 3 of 6 applicable records, there was no "Refusal of Health Care Services" (DC4-711A) after 3 consecutive medication refusals or 5 in one month.	
MH-13: In 4 records, follow-up psychiatric contacts were not conducted at appropriate intervals.	
MH-14: In 2 of 2 applicable records, Emergency Treatment Orders (ETO) were documented incorrectly.	

Finding	CAP Evaluation Outcome
INPATIENT MENTAL HEALTH SERVICES	MH-15 CLOSED
A comprehensive review of 14 inpatient records revealed the following deficiencies:	Adequate evidence of in-service training and documentation of correction were provided to close MH-15.
MH-15: In 8 of 8 applicable records, there was no documentation of a service planning interview.	MH-16, MH-17, MH-18, MH-19, MH-20, & MH-21 OPEN
MH-16: In 14 records, a risk assessment for violence was not completed as required.	Adequate evidence of in-service training was provided, however a review of randomly selected records indicated an acceptable level of
MH-17: In 3 records, the Individualized Service Plan (ISP) was not completed as required.	MH-17, MH-18, MH-19, MH-20, MH-21 will remain open.
MH-18: In 13 records, the required hours of planned structured therapeutic services	MH-22 CLOSED
were not provided. MH-19: In 9 records, weekly documentation of the inmate's participation in group activities and progress towards treatment goals was not	Adequate evidence of in-service training and documentation of correction were provided to close MH-22. MH-23 OPEN
present in the medical record. MH-20: In 10 records, nursing evaluations were not documented or completed as required.	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.MH-23
MH-21: In 3 records, vital signs were not documented at the required intervals.	will remain open.
MH-22: In 6 records, weight was not recorded weekly as required.	
MH-23: In 7 records, behavioral level assessments were missing or not reviewed within the required time frame.	

Finding	CAP Evaluation Outcome
OUTPATIENT MENTAL HEALTH SERVICES	MH-31 & MH-32 OPEN
A comprehensive review of 17 outpatient records revealed the following deficiencies:	Adequate evidence of in-service training was provided, however there were no applicable episodes available for review. MH-31 & MH-32 will
MH-31: In 1 of 3 applicable records, the bio-psychosocial assessment (BPSA) was	remain open.
not approved by the multidisciplinary services team within 30 days.	MH-33, MH-34, & MH-35 CLOSED
MH-32: In 1 of 2 applicable records, the Individualized Service Plan (ISP) was not completed timely.	Adequate evidence of in-service training and documentation of correction were provided to close MH-33, MH-34, & MH-35.
MH-33: In 6 records, the ISP was not signed by all relevant parties.	MH-36 OPEN
MH-34: In 6 records, problems were not listed on the Problem List. MH-35: In 2 of 10 applicable records, the ISP was not updated within 14 days of	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. MH-36 will remain open.
close management (CM) placement or transfer.	
MH-36: In 3 of 12 applicable records, inmates on CM status did not receive at least 1 hour of group or individual counseling each week.	

Finding	CAP Evaluation Outcome
AFTERCARE PLANNING	MH-37 & MH-38 CLOSED
A comprehensive review of 9 records of	Adequate evidence of in-service
S3 inmates within 180 days expiration of	training and documentation of
sentence (EOS) revealed the following	correction were provided to close
deficiencies:	MH-37 & MH-38.
MH-37: In 2 records, aftercare plans were	MH-39 OPEN
not addressed on the ISP for inmates	Adequate evidence of in-service
within 180 days of EOS.	training was provided, however a
MH-38: In 4 of 8 applicable records,	review of randomly selected records
consent to release information for	indicated an acceptable level of
continuity of care was missing or	compliance had not been met. MH-39
incomplete.	will remain open.
MH-39: In 1 of 2 applicable records, the Summary of Mental Health Care was not completed for inmates within 30 days EOS.	

B. Annex

The CAP closure files revealed evidence to determine that 8 of 9 mental health findings were corrected. One mental health finding will remain open

Finding	CAP Evaluation Outcome
SELF-HARM OBSERVATION STATUS (SHOS) MH-1: In 3 of 8 records reviewed, the inmate was not observed at the frequency ordered by the clinician.	MH-1 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. MH-1 will remain open.

Finding	CAP Evaluation Outcome
USE OF FORCE	MH-2 & MH-3 CLOSED
A comprehensive review of 4 use of force episodes revealed the following deficiencies:	Adequate evidence of in-service training and documentation of correction were provided to close MH-2 & MH-3.
MH-2: In 1 record, the post use of force exam not completed in its entirety to assess for injuries.	
MH-3: In 2 records, a written referral to mental health by physical health staff was not present.	

Finding	CAP Evaluation Outcome
INMATE REQUESTS	MH-4 CLOSED
MH-4: In 2 of 10 records reviewed, the referral or interview did not occur as intended in response to an inmate request.	Adequate evidence of in-service training and documentation of correction were provided to close MH-4.

Finding	CAP Evaluation Outcome
OUTPATIENT PSYCHOTROPIC MEDICATION PRACTICES MH-5: In 1 of 3 applicable records (16 reviewed), the Abnormal Involuntary Movement Scale (AIMS) was not completed as required.	MH-5 CLOSED Adequate evidence of in-service training and documentation of correction were provided to close MH-5.

Finding	CAP Evaluation Outcome
AFTERCARE PLANNING	MH-6, MH-7, & MH-8 CLOSED
A comprehensive review of 11 records of S3 inmates within 180 days expiration of sentence (EOS) revealed the following deficiencies:	Adequate evidence of in-service training and documentation of correction were provided to close MH-6, MH-7, & MH-8.
MH-6: In 2 of 4 applicable records, the Summary of Mental Health Care (DC4661) was not completed for inmates within 30 days EOS.	
MH-7: In 3 records, consent to release information for continuity of care was missing or not completed within 30 days EOS.	
MH-8: In 4 of 6 applicable records, assistance with Social Security benefits was not provided for inmates who meet the criteria.	

Finding	CAP Evaluation Outcome
MENTAL HEALTH SYSTEMS REVIEW	MH-9 CLOSED
MH-9: There was not sufficient restraint or self-harm prevention equipment for the inmate population.	Adequate documentation of correction was provided to close MH-9.

IV. Conclusion

Physical Health-Main Unit

The following physical health findings will close: PH-1, PH-2, PH-3, PH-4, PH-5, PH-15, PH-17, PH-18, PH-19, & PH-20. All other physical health findings will remain open.

Physical Health-Annex

The following physical health findings will close: PH-1, PH-2, PH-3, PH-4, PH-5, PH-7, PH-8, PH-12, PH-13, PH-15, & PH-17. All other physical health findings will remain open.

Mental Health-Main Unit

The following mental health findings will close: MH-3, MH-4, MH-7, MH8, MH-9, MH-10, MH-11, MH-12, MH-13, MH-14, MH-15, MH-22, MH-24, MH-25, MH-27, MH-28, MH-29, MH-30, MH-33, MH-34, MH-35, MH-37, & MH-38. All other mental health findings will remain open.

Mental Health-Annex

The following mental health findings will close: MH-2, MH-3, MH-4, MH-5, MH-6, MH-7, MH-8, & MH-9. All other mental health findings will remain open.

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