



OFFICE OF RECIPIENT RIGHTS
John T. Sanford, III, Director

Annual Report
FY 2006/2007

We must scrupulously guard the civil rights and civil liberties of all citizens whatever their background. We must remember that any oppression, any injustice, any hatred, is a wedge designed to attack our civilization.

Franklin D. Roosevelt

Table of Contents

Introduction	
The Department	2
The Annual Report	2
Organizational Chart	3
Part I - Field Unit/Complaint Activity	4
State Hospital/Center Data and Remedial Action Summary	5
Rights Training Provided by Field Unit Staff	34
DCH Appeals Committee	35
Part II - Training Unit	38
Educational Offerings	38
Rights Training Provided	39
Rights Training Received	42
Recipient Rights Conference	43
Part III - Community Rights Unit	
CMHSP Rights System Assessment	47
Pilot Licensed Hospital Rights System Assessments	49
Information and Referral	55
Rights Training Provided by Field Unit Staff	55
Part IV - Review of Budgetary Issues	59
Part V - Recommendations to the Department of Community Health	60
Part VI- Strategic Plan 2007/2008	61
Appendix A	
New Annual Report (2007/2008)	62
Appendix B	
Data Report for All CMHSP Rights Offices	71
Appendix C	
Remedial Action on substantiated complaints for all CMHSP Rights Offices	75
Appendix D	
Data Report for All LPH/U Rights Offices	166
Appendix E	
Remedial Action on substantiated complaints for all LPH/U Rights Offices	170

Mission: To protect and promote the constitutional and statutory rights of recipients of public mental health services and empower recipients to fully exercise these rights.

Vision: All recipients of public mental health services are empowered to exercise their rights and are able to fully participate in all facets of their lives.

INTRODUCTION

The Department

The Michigan Mental Health Code, PA 258 of 1974, established the Michigan Department of Community Health Office of Recipient Rights (DCH-ORR), its functions and its responsibilities. The primary mandates of the office are to provide direct rights protection and advocacy services to individuals admitted to state psychiatric hospitals and centers for developmental disabilities and to assess and monitor the quality and effectiveness of the rights protection systems in community mental health service programs and licensed private psychiatric hospitals/units.

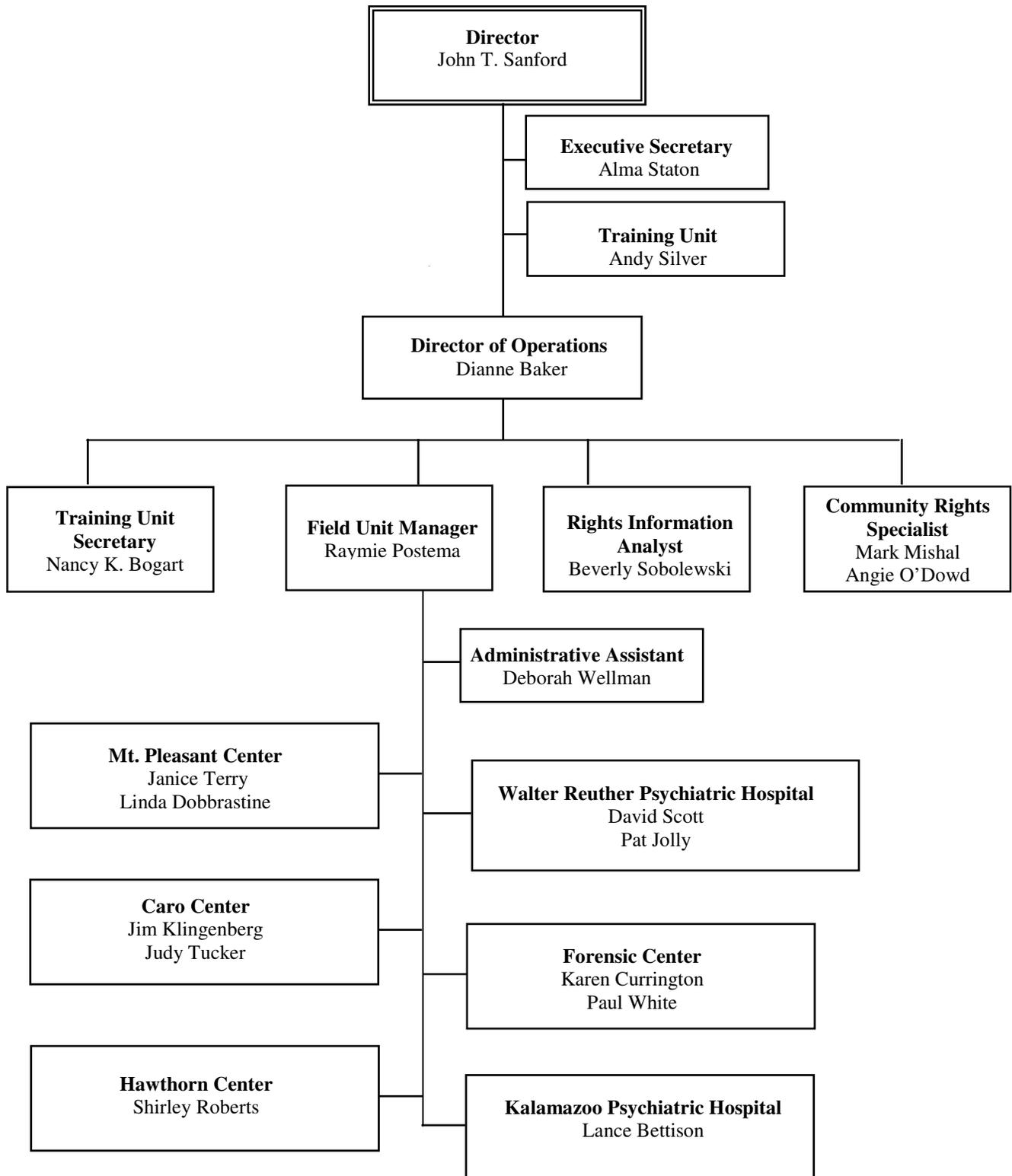
In order to fulfill the statutory mandates, DCH-ORR is organized into three distinct units: the Field Unit, the Training Unit and the Community Rights Unit (See Organizational Chart). This report will summarize the activity in each of these units for FY 2006/2007, as well as discuss any patterns and trends in rights protection in the state of Michigan identified for this period of time.

The Annual Report

This Annual Report reflects the requirements outlined in section 330.1754. The State Office of Recipient Rights shall submit to the director of the department and to the committees and subcommittees of the legislature with legislative oversight of mental health matters, for availability to the public, an annual report on the current status of recipient rights for the state. The report shall be submitted not later than March 31 of each year for the preceding fiscal year. The annual report shall include, at a minimum, all of the following:

- (i) Summary data by type or category regarding the rights of recipients receiving services from the department including the number of complaints received by state facility and other state-operated placement agency, the number of reports filed, and the number of reports investigated
- (ii) The number of substantiated rights violations in each state facility by category
- (iii) The remedial actions taken on substantiated rights violations in each state facility by category
- (iv) Training received by staff of the state office of recipient rights
- (v) Training provided by the state office of recipient rights to staff of contract providers
- (vi) Outcomes of assessments of the recipient rights system of each community mental health services program
- (vii) Identification of patterns and trends in rights protection in the public mental health system in this state
- (viii) Review of budgetary issues including staffing and financial resources
- (ix) Summary of the results of any consumer satisfaction surveys conducted (none FY 06/07)
- (x) Recommendations to the department

Michigan Department of Community Health OFFICE OF RECIPIENT RIGHTS



PART I - FIELD UNIT

Background

During FY 2006/07 ORR had field offices providing rights protection services to each of the six state hospitals and centers: Caro Center, Hawthorn Center, Mt. Pleasant Center, Kalamazoo Psychiatric Hospital, Walter Reuther Psychiatric Hospital, and the Center for Forensic Psychiatry. As of September 30, 2007, the Field Unit consisted of a Field Manager, one Administrative Assistant, and ten Rights Advisors.

Relevant Definitions

Allegation: An assertion of fact made by an individual that has not yet been proved or supported with evidence.

Investigation: A detailed inquiry into and a systematic examination of an allegation raised in a rights complaint and reported in accordance with Chapter 7A. An investigation must be conducted on allegations of abuse, neglect, serious injury or death when reasonable suspicion exists that a rights violation may have occurred.

Intervention: To act on behalf of a recipient to resolve a complaint alleging a violation of a code-protected right when the facts are clear and the remedy, if applicable, is clear, easily obtainable and does not involve statutorily required disciplinary action.

Preponderance: A standard of proof which is met when, based upon all the available evidence, it is more likely that a right was violated than not; greater weight of evidence, not as to quantity (number of witnesses), but as to quality (believability and greater weight of important facts provided).

Substantiation: A determination that a right was violated, utilizing a preponderance of evidence standard (evidence which is of greater weight or more convincing than the evidence offered in opposition to it) as proof.

Complaint Data and Remedial Action

There were a total of 3200 complaints received in state facilities for FY 06/07. The complaints received were resolved through intervention in 84% of cases, with 3.6 % substantiated, and through investigation in the remaining 16% of cases, with 16.7 % substantiated. Data analysis reveals a negligible increase in the use of the investigation process from 15.5% in FY 2005/2006. There were 345 complaints made which did not involve a Mental Health Code protected right and 52 complaints made which fell outside the jurisdiction of the hospital/center rights office.

The following is a comparison of complaint activity over five fiscal years:

FY	Complaints	Number investigated	Number substantiated
2003	2753	538	173
2004	3524	677	282
2005	4144	633	214
2006	3360	522	222
2007	3200	448	162

The Mental Health Code requires in 330.1780 (1): “If it has been determined through investigation that a right has been violated, the respondent shall take appropriate remedial action that meets all of the following requirements: (a) Corrects or provides a remedy for the rights violations. (b) Is implemented in a timely manner. (c) Attempts to prevent a recurrence of the rights violation.” It is the responsibility of the ORR to maintain a record of the documented action.

Following is the ORR complaint data and remedial action taken for specific types of rights violations for fiscal years FY 2006/2007 by individual facility.

Agency: Caro Center

Rights Advisors: Jim Klingenberg and Judy Tucker

Section I: Complaint Data Summary:

Part A: Totals

Allegations Involved	506
Allegations Investigated	80
Substantiated	17

Part B: Aggregate Summary

1. Freedom from Abuse

Code	Category	Received	Investigation	Intervention	Substantiated
7221	Abuse Class I	0	0	0	0
7222	Abuse Class II	43	43	0	1
7223	Abuse Class III	24	24	0	1
7224	Sexual Abuse	5	5	0	0

2. Freedom from Neglect

Code	Category	Received	Investigation	Intervention	Substantiated
7225	Neglect Class I	0	0	0	0
7226	Neglect Class II	1	1	0	0
7227	Neglect Class III	3	3	0	1

3. Rights Protection System

Code	Category	Received	Investigation	Intervention	Substantiated
7760	Access to Rights System	4	0	4	0
7545	Retaliation/Harassment	0	0	0	0
7060	Notice/Explanation of Rights	0	0	0	0
7780	Complaint Investigation Process	0	0	0	0
7840	Appeal Process	0	0	0	0
7880	Mediation	1	0	1	0
7520	Failure to Report	2	1	1	1

4. Admission/Discharge/Second Opinion

Code	Category	Received	Investigation	Intervention	Substantiated
7050	Second Opinion - Denial of Services	0	0	0	0
4090	Second Opinion - Denial of Hospitalization	0	0	0	0
4980	Objection to Hospitalization (minor)	0	0	0	0
4190	Termination of Voluntary Hospitalization (adult)	1	0	1	0
4630	Independent Clinical Examination	1	0	1	0
4510	Court Hearing/Process	7	0	7	0

5. Civil Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7041	Civil Rights: Discrimination, Accessibility, Accommodation, etc	1	0	1	0
7044	Religious Practice	2	0	2	0
7045	Voting	0	0	0	0
7047	Presumption of Competency	0	0	0	0
7048	Marriage/Divorce	0	0	0	0

6. Family Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7111	Dignity & Respect	0	0	0	0
7112	Receipt of General Education Information	0	0	0	0
7113	Opportunity to provide information	0	0	0	0

7. Communication & Visits

Code	Category	Received	Investigation	Intervention	Substantiated
7261	Visitation	2	0	2	0
7262	Contact with Attorneys or others regarding legal matters	0	0	0	0
7263	Access to telephone, mail	4	0	4	0
7264	Funds for postage, stationery, telephone usage	0	0	0	0
7265	Written and posted limitations, if established	0	0	0	0
7266	Uncensored Mail	1	0	1	0
7267	Access to entertainment materials, information, news	2	0	2	0

8. Confidentiality/Privileged Communications/Disclosure

Code	Category	Received	Investigation	Intervention	Substantiated
7481	Disclosure of Confidential Information	0	0	0	0
7485	Withholding of Information (includes Recipient access to records)	1	0	1	0
7486	Correction of Record	6	0	6	0
7487	Access by P & A to records	0	0	0	0
7501	Privileged Communication	0	0	0	0

9. Treatment Environment

Code	Category	Received	Investigation	Intervention	Substantiated
7081	Safety	41	0	41	2
7082	Sanitary	17	0	17	3
7083	Humane	47	0	47	4
1708	Dignity & Respect	29	1	28	2
7085	Nutrition	15	0	15	0
7086	Least Restrictive Setting	15	0	15	0

10. Freedom of Movement

Code	Category	Received	Investigation	Intervention	Substantiated
7441	Restrictions/Limitations	20	0	20	0
7400	Restraint	1	0	1	0
7420	Seclusion	0	0	0	0

11. Financial Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7301	Safeguarding Money	4	0	4	0
7302	Facility Account	1	0	1	0
7303	Easy Access to Money in Account	0	0	0	0
7304	Ability to Spend or Use as Desired	7	1	6	0
7305	Delivery of Money upon Release	0	0	0	0
7360	Labor & Compensation	0	0	0	0

12. Personal Property

Code	Category	Received	Investigation	Intervention	Substantiated
7281	Possession and Use	24	0	24	0
7282	Storage Space	0	0	0	0
7283	Inspection at Reasonable Times	0	0	0	0
7284	Search/Seizure	1	0	1	0
7285	Exclusions	0	0	0	0
7286	Limitations	0	0	0	0
7287	Receipts to Recipient and to Designated Individual	0	0	0	0
7288	Waiver	0	0	0	0
7289	Protection	9	0	9	0

13. Suitable Services

Code	Category	Received	Investigation	Intervention	Substantiated
7080	Treatment suited to condition	76	0	76	1
7049	Treatment by spiritual means	0	0	0	0
7100	Physical and mental exams	1	0	1	0
7130	Choice of physician/mental health professional	5	0	5	0
7140	Notice of clinical status/progress	1	0	1	0
7150	Services of mental health professional	8	0	8	0
7003	Informed Consent	0	0	0	0
7170	Electro Convulsive Therapy (ECT)	0	0	0	0
7160	Surgery	0	0	0	0
7180	Psychotropic Drugs	15	1	14	1
7190	Notice of medication side effects	2	0	2	0
7029	Information on Family Planning	0	0	0	0

14. Treatment Planning

Code	Category	Received	Investigation	Intervention	Substantiated
7121	Person-Centered Process	2	0	2	0
7122	Timely development	0	0	0	0
7123	Requests for Review	1	0	1	0
7124	Participation by Individual(s) of choice	1	0	1	0
7125	Assessment of Needs	0	0	0	0

15. Photographs, Fingerprints, Audiotapes, One-way Glass

Code	Category	Received	Investigation	Intervention	Substantiated
7241	Prior Consent	0	0	0	0
7242	Identification	0	0	0	0
7243	Objection	0	0	0	0
7244	Release to others/return	0	0	0	0
7245	Storage/Destruction	0	0	0	0
7246	Treatment	0	0	0	0

Agency: Center for Forensic Psychiatry

Rights Advisors: Karen Currington and Paul White

Section I: Complaint Data Summary:

Part A: Totals

Allegations Involved	657
Allegations Investigated	54
Substantiated	40

Part B: Aggregate Summary

1. Freedom from Abuse

Code	Category	Received	Investigation	Intervention	Substantiated
7221	Abuse Class I	0	0	0	0
7222	Abuse Class II	17	17	0	6
7223	Abuse Class III	13	13	0	0
7224	Sexual Abuse	0	0	0	0

2. Freedom from Neglect

Code	Category	Received	Investigation	Intervention	Substantiated
7225	Neglect Class I	0	0	0	0
7226	Neglect Class II	3	3	0	1
7227	Neglect Class III	4	4	0	1

3. Rights Protection System

Code	Category	Received	Investigation	Intervention	Substantiated
7760	Access to Rights System	0	0	0	0
7545	Retaliation/Harassment	1	1	0	0
7060	Notice/Explanation of Rights	0	0	0	0
7780	Complaint Investigation Process	1	0	1	0
7840	Appeal Process	0	0	0	0
7880	Mediation	0	0	0	0
7520	Failure to Report	0	0	0	0

4. Admission/Discharge/Second Opinion

Code	Category	Received	Investigation	Intervention	Substantiated
7050	Second Opinion - Denial of Services	0	0	0	0
4090	Second Opinion - Denial of Hospitalization	0	0	0	0
4980	Objection to Hospitalization (minor)	0	0	0	0
4190	Termination of Voluntary Hospitalization (adult)	0	0	0	0
4630	Independent Clinical Examination	1	0	1	0
4510	Court Hearing/Process	3	0	3	0

5. Civil Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7041	Civil Rights: Discrimination, Accessibility, Accommodation, etc	8	0	8	0
7044	Religious Practice	2	0	2	0
7045	Voting	0	0	0	0
7047	Presumption of Competency	0	0	0	0
7048	Marriage/Divorce	0	0	0	0

6. Family Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7111	Dignity & Respect	0	0	0	0
7112	Receipt of General Education Information	0	0	0	0
7113	Opportunity to provide information	0	0	0	0

7. Communication & Visits

Code	Category	Received	Investigation	Intervention	Substantiated
7261	Visitation	0	0	0	0
7262	Contact with Attorneys or others regarding legal matters	0	0	0	0
7263	Access to telephone, mail	21	0	21	0
7264	Funds for postage, stationery, telephone usage	2	0	2	0
7265	Written and posted limitations, if established	2	0	2	0
7266	Uncensored Mail	3	0	3	0
7267	Access to entertainment materials, information, news	1	0	1	0

8. Confidentiality/Privileged Communications/Disclosure

Code	Category	Received	Investigation	Intervention	Substantiated
7481	Disclosure of Confidential Information	5	3	2	2
7485	Withholding of Information (includes Recipient access to records)	1	0	1	0
7486	Correction of Record	3	0	3	0
7487	Access by P & A to records	0	0	0	0
7501	Privileged Communication	0	0	0	0

9. Treatment Environment

Code	Category	Received	Investigation	Intervention	Substantiated
7081	Safety	25	0	25	0
7082	Sanitary	4	0	4	3
7083	Humane	16	0	16	1
1708	Dignity & Respect	50	8	42	5
7085	Nutrition	29	0	29	1
7086	Least Restrictive Setting	0	0	0	0

10. Freedom of Movement

Code	Category	Received	Investigation	Intervention	Substantiated
7441	Restrictions/Limitations	16	0	16	1
7400	Restraint	2	2	0	2
7420	Seclusion	2	1	1	0

11. Financial Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7301	Safeguarding Money	3	0	3	0
7302	Facility Account	11	0	11	0
7303	Easy Access to Money in Account	3	0	3	0
7304	Ability to Spend or Use as Desired	1	0	1	0
7305	Delivery of Money upon Release	0	0	0	0
7360	Labor & Compensation	0	0	0	0

12. Personal Property

Code	Category	Received	Investigation	Intervention	Substantiated
7281	Possession and Use	20	0	20	0
7282	Storage Space	1	0	1	0
7283	Inspection at Reasonable Times	20	0	20	0
7284	Search/Seizure	1	0	1	0
7285	Exclusions	0	0	0	0
7286	Limitations	2	0	2	0
7287	Receipts to Recipient and to Designated Individual	1	0	1	0
7288	Waiver	0	0	0	0
7289	Protection	13	0	13	1

13. Suitable Services

Code	Category	Received	Investigation	Intervention	Substantiated
7080	Treatment suited to condition	210	2	208	13
7049	Treatment by spiritual means	2	0	2	1
7100	Physical and mental exams	1	0	1	0
7130	Choice of physician/mental health professional	0	0	0	0
7140	Notice of clinical status/progress	1	0	1	0
7150	Services of mental health professional	0	0	0	0
7003	Informed Consent	0	0	0	0
7170	Electro Convulsive Therapy (ECT)	0	0	0	0
7160	Surgery	0	0	0	0
7180	Psychotropic Drugs	31	0	31	1
7190	Notice of medication side effects	0	0	0	0
7029	Information on Family Planning	0	0	0	0

14. Treatment Planning

Code	Category	Received	Investigation	Intervention	Substantiated
7121	Person-Centered Process	0	0	0	0
7122	Timely development	0	0	0	0
7123	Requests for Review	0	0	0	0
7124	Participation by Individual(s) of choice	0	0	0	0
7125	Assessment of Needs	3	0	3	1

15. Photographs, Fingerprints, Audiotapes, One-way Glass

Code	Category	Received	Investigation	Intervention	Substantiated
7241	Prior Consent	0	0	0	0
7242	Identification	0	0	0	0
7243	Objection	0	0	0	0
7244	Release to others/return	0	0	0	0
7245	Storage/Destruction	0	0	0	0
7246	Treatment	0	0	0	0

16. Forensic Issues

Code	Category	Received	Investigation	Intervention	Substantiated
2020	Incompetent to Stand Trial (I.S.T.)	3	0	3	0
2050	Not Guilty by Reason of Insanity (N.G.R.I.)	0	0	0	0

17. No Right Involved

Code	Category	Received
0000	No Right Involved	68

18. Outside Provider Jurisdiction

Code	Category	
0001	Outside Provider Jurisdiction	27

657

54

508

40

Remedial Action Key					
01	Verbal Counseling	06	Staff Transfer	10	Policy Revision/Development
02	Written Counseling	07	Training	11	Environmental Repair /Enhancement
03	Written Reprimand	08	Employment Termination	12	Plan of Service Revision
04	Suspension	08*	Employee left the agency, but substantiated	13	Recipient Transfer to Another Provider/Site
05	Demotion	09	Contract Action	14	Other

Remedial Action Taken for Center for Forensic Psychiatry

Code	Category	Action Taken
7481	Disclosure of Confidential Information	03
7481	Disclosure of Confidential Information	08
7441	Restrictions / Limitations	01
7400	Restraint	01
7400	Restraint	03
7289	Personal Property Protection	14
7228	Abuse Class II - Unreasonable Force	04
7227	Neglect Class III	03
7226	Neglect Class II	04
7222	Abuse Class II - Non-Accidental Act	04
7222	Abuse Class II - Non-Accidental Act	03
7222	Abuse Class II - Non-Accidental Act	03
7222	Abuse Class II - Non-Accidental Act	04
7222	Abuse Class II - Non-Accidental Act	04
7180	Psychotropic Drugs	14
7125	Assessment of Needs	14
7085	Nutrition	14
7083	Humane-Treatment Environment	14
7082	Sanitary/Human-Treatment Environment	14
7082	Sanitary/Human-Treatment Environment	14
7082	Sanitary/Human-Treatment Environment	01
7080	Services suited to Condition	14
7080	Services suited to Condition	11
7080	Services suited to Condition	11
7080	Services suited to Condition	14
7080	Services suited to Condition	01
7080	Services suited to Condition	01
7080	Services suited to Condition	11
7080	Services suited to Condition	08
7080	Services suited to Condition	01
7080	Services suited to Condition	14

Code	Category	Action Taken
7080	Services suited to Condition	01
7080	Services suited to Condition	14
7080	Services suited to Condition	10
7049	Treatment by Spiritual Means	12
1708	Dignity & Respect	14
1708	Dignity & Respect	01
1708	Dignity & Respect	07
1708	Dignity & Respect	02
1708	Dignity & Respect	01

Agency: Hawthorn Center

Rights Advisor: Shirley Roberts

Section I: Complaint Data Summary:

Part A: Totals

Allegations Involved	134
Allegations Investigated	39
Substantiated	12

Part B: Aggregate Summary

1. Freedom from Abuse

Code	Category	Received	Investigation	Intervention	Substantiated
7221	Abuse Class I	2	2	0	0
7222	Abuse Class II	22	22	0	0
7223	Abuse Class III	12	12	0	3
7224	Sexual Abuse	0	0	0	0

2. Freedom from Neglect

Code	Category	Received	Investigation	Intervention	Substantiated
7225	Neglect Class I	0	0	0	0
7226	Neglect Class II	0	0	0	0
7227	Neglect Class III	3	3	0	3

3. Rights Protection System

Code	Category	Received	Investigation	Intervention	Substantiated
7760	Access to Rights System	0	0	0	0
7545	Retaliation/Harassment	0	0	0	0
7060	Notice/Explanation of Rights	0	0	0	0
7780	Complaint Investigation Process	0	0	0	0
7840	Appeal Process	0	0	0	0
7880	Mediation	0	0	0	0
7520	Failure to Report	0	0	0	0

4. Admission/Discharge/Second Opinion

Code	Category	Received	Investigation	Intervention	Substantiated
7050	Second Opinion - Denial of Services	0	0	0	0
4090	Second Opinion - Denial of Hospitalization	0	0	0	0
4980	Objection to Hospitalization (minor)	0	0	0	0
4190	Termination of Voluntary Hospitalization (adult)	0	0	0	0
4630	Independent Clinical Examination	0	0	0	0
4510	Court Hearing/Process	0	0	0	0

5. Civil Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7041	Civil Rights: Discrimination, Accessibility, Accommodation, etc	0	0	0	0
7044	Religious Practice	0	0	0	0
7045	Voting	0	0	0	0
7047	Presumption of Competency	0	0	0	0
7048	Marriage/Divorce	0	0	0	0

6. Family Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7111	Dignity & Respect	2	0	2	0
7112	Receipt of General Education Information	0	0	0	0
7113	Opportunity to provide information	0	0	0	0

7. Communication & Visits

Code	Category	Received	Investigation	Intervention	Substantiated
7261	Visitation	2	0	2	0
7262	Contact with Attorneys or others regarding legal matters	0	0	0	0
7263	Access to telephone, mail	5	0	5	0
7264	Funds for postage, stationery, telephone usage	0	0	0	0
7265	Written and posted limitations, if established	0	0	0	0
7266	Uncensored Mail	0	0	0	0
7267	Access to entertainment materials, information, news	0	0	0	0

8. Confidentiality/Privileged Communications/Disclosure

Code	Category	Received	Investigation	Intervention	Substantiated
7481	Disclosure of Confidential Information	0	0	0	0
7485	Withholding of Information (includes Recipient access to records)	1	0	1	1
7486	Correction of Record	0	0	0	0
7487	Access by P & A to records	0	0	0	0
7501	Privileged Communication	0	0	0	0

9. Treatment Environment

Code	Category	Received	Investigation	Intervention	Substantiated
7081	Safety	25	0	25	1
7082	Sanitary	3	0	3	0
7083	Humane	3	0	3	1
1708	Dignity & Respect	11	0	11	0
7085	Nutrition	3	0	3	0
7086	Least Restrictive Setting	0	0	0	0

10. Freedom of Movement

Code	Category	Received	Investigation	Intervention	Substantiated
7441	Restrictions/Limitations	8	0	8	0
7400	Restraint	0	0	0	0
7420	Seclusion	0	0	0	0

11. Financial Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7301	Safeguarding Money	0	0	0	0
7302	Facility Account	0	0	0	0
7303	Easy Access to Money in Account	0	0	0	0
7304	Ability to Spend or Use as Desired	0	0	0	0
7305	Delivery of Money upon Release	0	0	0	0
7360	Labor & Compensation	0	0	0	0

12. Personal Property

Code	Category	Received	Investigation	Intervention	Substantiated
7281	Possession and Use	2	0	2	0
7282	Storage Space	0	0	0	0
7283	Inspection at Reasonable Times	0	0	0	0
7284	Search/Seizure	1	0	1	0
7285	Exclusions	0	0	0	0
7286	Limitations	0	0	0	0
7287	Receipts to Recipient and to Designated Individual	0	0	0	0
7288	Waiver	0	0	0	0
7289	Protection	7	0	7	3

13. Suitable Services

Code	Category	Received	Investigation	Intervention	0
7080	Treatment suited to condition	10	0	10	0
7049	Treatment by spiritual means	0	0	0	0
7100	Physical and mental exams	0	0	0	0
7130	Choice of physician/mental health professional	0	0	0	0
7140	Notice of clinical status/progress	0	0	0	0
7150	Services of mental health professional	0	0	0	0
7003	Informed Consent	0	0	0	0
7170	Electro Convulsive Therapy (ECT)	0	0	0	0
7160	Surgery	0	0	0	0
7180	Psychotropic Drugs	3	0	3	0
7190	Notice of medication side effects	0	0	0	0
7029	Information on Family Planning	0	0	0	0

14. Treatment Planning

Code	Category	Received	Investigation	Intervention	Substantiated
7121	Person-Centered Process	0	0	0	0
7122	Timely development	0	0	0	0
7123	Requests for Review	3	0	3	0
7124	Participation by Individual(s) of choice	0	0	0	0
7125	Assessment of Needs	0	0	0	0

15. Photographs, Fingerprints, Audiotapes, One-way Glass

Code	Category	Received	Investigation	Intervention	Substantiated
7241	Prior Consent	0	0	0	0
7242	Identification	0	0	0	0
7243	Objection	0	0	0	0
7244	Release to others/return	0	0	0	0
7245	Storage/Destruction	0	0	0	0
7246	Treatment	0	0	0	0

17. No Right Involved

Code	Category	Received
0000	No Right Involved	6

18. Outside Provider Jurisdiction

Code	Category	
0001	Outside Provider Jurisdiction	0

134

39

95

12

Remedial Action Key					
01	Verbal Counseling	06	Staff Transfer	10	Policy Revision/Development
02	Written Counseling	07	Training	11	Environmental Repair /Enhancement
03	Written Reprimand	08	Employment Termination	12	Plan of Service Revision
04	Suspension	08*	Employee left the agency, but substantiated	13	Recipient Transfer to Another Provider/Site
05	Demotion	09	Contract Action	14	Other

Remedial Action Taken for Hawthorn Center

Code	Category	Action Taken
7485	Withholding of Information	14
7289	Personal Property Protection	14
7289	Personal Property Protection	14
7289	Personal Property Protection	14
7227	Neglect Class III	04
7227	Neglect Class III	03
7227	Neglect Class III	03
7223	Abuse Class III	08
7223	Abuse Class III	04
7223	Abuse Class III	08
7083	Humane-Treatment Environment	14
7081	Safety-Treatment Environment	13

Agency: Kalamazoo Psychiatric Hospital

Rights Advisor: Lance Bettison

Section I: Complaint Data Summary:

Part A: Totals

Allegations Involved	554
Allegations Investigated	65
Substantiated	23

Part B: Aggregate Summary

1. Freedom from Abuse

Code	Category	Received	Investigation	Intervention	Substantiated
7221	Abuse Class I	0	0	0	0
7222	Abuse Class II	20	20	0	3
7223	Abuse Class III	19	19	0	1
7224	Sexual Abuse	8	8	0	1

2. Freedom from Neglect

Code	Category	Received	Investigation	Intervention	Substantiated
7225	Neglect Class I	0	0	0	0
7226	Neglect Class II	2	2	0	1
7227	Neglect Class III	4	4	0	3

3. Rights Protection System

Code	Category	Received	Investigation	Intervention	Substantiated
7760	Access to Rights System	1	0	1	0
7545	Retaliation/Harassment	1	1	0	0
7060	Notice/Explanation of Rights	0	0	0	0
7780	Complaint Investigation Process	1	0	1	0
7840	Appeal Process	0	0	0	0
7880	Mediation	0	0	0	0
7520	Failure to Report	0	0	0	0

4. Admission/Discharge/Second Opinion

Code	Category	Received	Investigation	Intervention	Substantiated
7050	Second Opinion - Denial of Services	0	0	0	0
4090	Second Opinion - Denial of Hospitalization	0	0	0	0
4980	Objection to Hospitalization (minor)	0	0	0	0
4190	Termination of Voluntary Hospitalization (adult)	1	0	1	0
4630	Independent Clinical Examination	0	0	0	0
4510	Court Hearing/Process	6	0	6	0

5. Civil Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7041	Civil Rights: Discrimination, Accessibility, Accommodation, etc	0	0	0	0
7044	Religious Practice	3	0	3	0
7045	Voting	0	0	0	0
7047	Presumption of Competency	0	0	0	0
7048	Marriage/Divorce	0	0	0	0

6. Family Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7111	Dignity & Respect	0	0	0	0
7112	Receipt of General Education Information	0	0	0	0
7113	Opportunity to provide information	1	0	1	1

7. Communication & Visits

Code	Category	Received	Investigation	Intervention	Substantiated
7261	Visitation	0	0	0	0
7262	Contact with Attorneys or others regarding legal matters	0	0	0	0
7263	Access to telephone, mail	5	0	5	0
7264	Funds for postage, stationery, telephone usage	1	0	1	0
7265	Written and posted limitations, if established	0	0	0	0
7266	Uncensored Mail	2	0	2	1
7267	Access to entertainment materials, information, news	3	0	3	0

8. Confidentiality/Privileged Communications/Disclosure

Code	Category	Received	Investigation	Intervention	Substantiated
7481	Disclosure of Confidential Information	6	0	6	0
7485	Withholding of Information (includes Recipient access to records)	5	0	5	0
7486	Correction of Record	0	0	0	0
7487	Access by P & A to records	0	0	0	0
7501	Privileged Communication	0	0	0	0

9. Treatment Environment

Code	Category	Received	Investigation	Intervention	Substantiated
7081	Safety	19	0	19	0
7082	Sanitary	8	0	8	0
7083	Humane	6	0	6	1
1708	Dignity & Respect	62	7	55	5
7085	Nutrition	14	0	14	1
7086	Least Restrictive Setting	1	0	1	0

10. Freedom of Movement

Code	Category	Received	Investigation	Intervention	Substantiated
7441	Restrictions/Limitations	31	1	30	1
7400	Restraint	2	0	2	0
7420	Seclusion	2	0	2	0

11. Financial Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7301	Safeguarding Money	6	0	6	0
7302	Facility Account	2	0	2	0
7303	Easy Access to Money in Account	2	0	2	0
7304	Ability to Spend or Use as Desired	1	0	1	0
7305	Delivery of Money upon Release	0	0	0	0
7360	Labor & Compensation	2	0	2	0

12. Personal Property

Code	Category	Received	Investigation	Intervention	Substantiated
7281	Possession and Use	8	0	8	2
7282	Storage Space	0	0	0	0
7283	Inspection at Reasonable Times	0	0	0	0
7284	Search/Seizure	4	0	4	1
7285	Exclusions	0	0	0	0
7286	Limitations	0	0	0	0
7287	Receipts to Recipient and to Designated Individual	0	0	0	0
7288	Waiver	0	0	0	0
7289	Protection	8	0	8	0

13. Suitable Services

Code	Category	Received	Investigation	Intervention	Substantiated
7080	Treatment suited to condition	67	3	64	0
7049	Treatment by spiritual means	0	0	0	0
7100	Physical and mental exams	0	0	0	0
7130	Choice of physician/mental health professional	1	0	1	0
7140	Notice of clinical status/progress	0	0	0	0
7150	Services of mental health professional	0	0	0	0
7003	Informed Consent	0	0	0	0
7170	Electro Convulsive Therapy (ECT)	0	0	0	0
7160	Surgery	0	0	0	0
7180	Psychotropic Drugs	3	0	3	0
7190	Notice of medication side effects	1	0	1	1
7029	Information on Family Planning	0	0	0	0

14. Treatment Planning

Code	Category	Received	Investigation	Intervention	Substantiated
7121	Person-Centered Process	1	0	1	0
7122	Timely development	1	0	1	0
7123	Requests for Review	0	0	0	0
7124	Participation by Individual(s) of choice	0	0	0	0
7125	Assessment of Needs	0	0	0	0

15. Photographs, Fingerprints, Audiotapes, One-way Glass

Code	Category	Received	Investigation	Intervention	Substantiated
7241	Prior Consent	1	0	1	0
7242	Identification	0	0	0	0
7243	Objection	0	0	0	0
7244	Release to others/return	0	0	0	0
7245	Storage/Destruction	0	0	0	0
7246	Treatment	0	0	0	0

16. Forensic Issues

Code	Category	Received	Investigation	Intervention	Substantiated
2020	Incompetent to Stand Trial (I.S.T.)	0	0	0	0
2050	Not Guilty by Reason of Insanity (N.G.R.I.)	1	0	1	0

17. No Right Involved

Code	Category	Received
0000	No Right Involved	197

18. Outside Provider Jurisdiction

Code	Category	
0001	Outside Provider Jurisdiction	14

554

65

278

23

Remedial Action Key					
01	Verbal Counseling	06	Staff Transfer	10	Policy Revision/Development
02	Written Counseling	07	Training	11	Environmental Repair /Enhancement
03	Written Reprimand	08	Employment Termination	12	Plan of Service Revision
04	Suspension	08*	Employee left the agency, but substantiated	13	Recipient Transfer to Another Provider/Site
05	Demotion	09	Contract Action	14	Other

Remedial Action Taken for Kalamazoo Psychiatric Hospital

Code	Category	Action Taken
7441	Restrictions / Limitations	07
7284	Search/Seizure	07
7281	Possession/Use	12
7281	Possession/Use	14
7266	Uncensored mail	01
7227	Neglect Class III	02
7227	Neglect Class III	03
7227	Neglect Class III	03
7226	Neglect Class II	04
7224	Abuse Class I - Sexual Abuse	08*

Code	Category	Action Taken
7223	Abuse Class III	03
7222	Abuse Class II - Non-Accidental Act	07
7222	Abuse Class II - Non-Accidental Act	04
7222	Abuse Class II - Non-Accidental Act	04
7190	Notice of Medication Side Effects	07
7113	Opportunity to provide information	07
7085	Nutrition	14
7082	Sanitary/Human-Treatment Environment	14
1708	Dignity & Respect	01
1708	Dignity & Respect	03
1708	Dignity & Respect	01
1708	Dignity & Respect	03
1708	Dignity & Respect	01

Agency: Mt. Pleasant Center

Rights Advisors: Linda Dobbrastine and Janice Terry

Section I: *Complaint Data Summary:*

Part A: Totals

Allegations Involved	779
Allegations Investigated	164
Substantiated	43

Part B: Aggregate Summary

1. Freedom from Abuse

Code	Category	Received	Investigation	Intervention	Substantiated
7221	Abuse Class I	0	0	0	0
7222	Abuse Class II	81	81	0	4
7223	Abuse Class III	32	32	0	0
7224	Sexual Abuse	4	4	0	5

2. Freedom from Neglect

Code	Category	Received	Investigation	Intervention	Substantiated
7225	Neglect Class I	0	0	0	0
7226	Neglect Class II	10	10	0	6
7227	Neglect Class III	22	22	0	13

3. Rights Protection System

Code	Category	Received	Investigation	Intervention	Substantiated
7760	Access to Rights System	1	0	1	0
7545	Retaliation/Harassment	2	1	1	0
7060	Notice/Explanation of Rights	0	0	0	0
7780	Complaint Investigation Process	1	0	1	0
7840	Appeal Process	0	0	0	0
7880	Mediation	0	0	0	0
7520	Failure to Report	4	4	0	3

4. Admission/Discharge/Second Opinion

Code	Category	Received	Investigation	Intervention	Substantiated
7050	Second Opinion - Denial of Services	0	0	0	0
4090	Second Opinion - Denial of Hospitalization	0	0	0	0
4980	Objection to Hospitalization (minor)	0	0	0	0
4190	Termination of Voluntary Hospitalization (adult)	0	0	0	0
4630	Independent Clinical Examination	0	0	0	0
4510	Court Hearing/Process	0	0	0	0

5. Civil Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7041	Civil Rights: Discrimination, Accessibility, Accommodation, etc	2	0	2	0
7044	Religious Practice	0	0	0	0
7045	Voting	0	0	0	0
7047	Presumption of Competency	0	0	0	0
7048	Marriage/Divorce	0	0	0	0

6. Family Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7111	Dignity & Respect	1	0	1	1
7112	Receipt of General Education Information	0	0	0	0
7113	Opportunity to provide information	0	0	0	0

7. Communication & Visits

Code	Category	Received	Investigation	Intervention	Substantiated
7261	Visitation	2	0	2	0
7262	Contact with Attorneys or others regarding legal matters	0	0	0	0
7263	Access to telephone, mail	12	0	12	0
7264	Funds for postage, stationery, telephone usage	0	0	0	0
7265	Written and posted limitations, if established	0	0	0	0
7266	Uncensored Mail	0	0	0	0
7267	Access to entertainment materials, information, news	9	0	9	0

8. Confidentiality/Privileged Communications/Disclosure

Code	Category	Received	Investigation	Intervention	Substantiated
7481	Disclosure of Confidential Information	6	0	6	2
7485	Withholding of Information (includes Recipient access to records)	0	0	0	0
7486	Correction of Record	0	0	0	0
7487	Access by P & A to records	0	0	0	0
7501	Privileged Communication	0	0	0	0

9. Treatment Environment

Code	Category	Received	Investigation	Intervention	Substantiated
7081	Safety	127	1	126	0
7082	Sanitary	3	0	3	1
7083	Humane	117	0	117	1
1708	Dignity & Respect	43	0	43	1
7085	Nutrition	18	0	18	0
7086	Least Restrictive Setting	40	0	40	0

10. Freedom of Movement

Code	Category	Received	Investigation	Intervention	Substantiated
7441	Restrictions/Limitations	15	0	15	0
7400	Restraint	5	1	4	3
7420	Seclusion	0	0	0	0

11. Financial Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7301	Safeguarding Money	4	0	4	0
7302	Facility Account	2	0	2	0
7303	Easy Access to Money in Account	5	0	5	0
7304	Ability to Spend or Use as Desired	3	0	3	0
7305	Delivery of Money upon Release	0	0	0	0
7360	Labor & Compensation	1	0	1	0

12. Personal Property

Code	Category	Received	Investigation	Intervention	Substantiated
7281	Possession and Use	29	1	28	0
7282	Storage Space	0	0	0	0
7283	Inspection at Reasonable Times	0	0	0	0
7284	Search/Seizure	0	0	0	0
7285	Exclusions	0	0	0	0
7286	Limitations	2	0	2	0
7287	Receipts to Recipient and to Designated Individual	0	0	0	0
7288	Waiver	0	0	0	0
7289	Protection	12	0	12	0

13. Suitable Services

Code	Category	Received	Investigation	Intervention	Substantiated
7080	Treatment suited to condition	136	6	130	2
7049	Treatment by spiritual means	0	0	0	0
7100	Physical and mental exams	0	0	0	0
7130	Choice of physician/mental health professional	0	0	0	0
7140	Notice of clinical status/progress	0	0	0	0
7150	Services of mental health professional	1	0	1	0
7003	Informed Consent	2	1	1	1
7170	Electro Convulsive Therapy (ECT)	0	0	0	0
7160	Surgery	0	0	0	0
7180	Psychotropic Drugs	1	0	1	0
7190	Notice of medication side effects	0	0	0	0
7029	Information on Family Planning	0	0	0	0

14. Treatment Planning

Code	Category	Received	Investigation	Intervention	Substantiated
7121	Person-Centered Process	0	0	0	0
7122	Timely development	0	0	0	0
7123	Requests for Review	0	0	0	0
7124	Participation by Individual(s) of choice	0	0	0	0
7125	Assessment of Needs	0	0	0	0

15. Photographs, Fingerprints, Audiotapes, One-way Glass

Code	Category	Received	Investigation	Intervention	Substantiated
7241	Prior Consent	0	0	0	0
7242	Identification	0	0	0	0
7243	Objection	0	0	0	0
7244	Release to others/return	0	0	0	0
7245	Storage/Destruction	0	0	0	0
7246	Treatment	0	0	0	0

17. No Right Involved

Code	Category	Received
0000	No Right Involved	24

18. Outside Provider Jurisdiction

Code	Category	0
0001	Outside Provider Jurisdiction	

779

164

591

43

Remedial Action Key					
01	Verbal Counseling	06	Staff Transfer	10	Policy Revision/Development
02	Written Counseling	07	Training	11	Environmental Repair /Enhancement
03	Written Reprimand	08	Employment Termination	12	Plan of Service Revision
04	Suspension	08*	Employee left the agency, but substantiated	13	Recipient Transfer to Another Provider/Site
05	Demotion	09	Contract Action	14	Other

Remedial Action Taken for Mt. Pleasant Center

Code	Category	Action Taken
7520	Failure to Report	03
7520	Failure to Report	03
7520	Failure to Report	03
7481	Disclosure of Confidential Information	01
7481	Disclosure of Confidential Information	10
7400	Restraint	07
7400	Restraint	07
7400	Restraint	02
7227	Neglect Class III	03
7227	Neglect Class III	03
7227	Neglect Class III	04
7227	Neglect Class III	08
7227	Neglect Class III	03
7227	Neglect Class III	03
7227	Neglect Class III	03
7227	Neglect Class III	04
7227	Neglect Class III	03
7227	Neglect Class III	07
7227	Neglect Class III	03
7227	Neglect Class III	04
7227	Neglect Class III	08
7226	Neglect Class II	04
7226	Neglect Class II	04
7226	Neglect Class II	04
7226	Neglect Class II	08*
7226	Neglect Class II	07
7226	Neglect Class II	08

Code	Category	Action Taken
7223	Abuse Class III	03
7223	Abuse Class III	03
7223	Abuse Class III	03
7223	Abuse Class III	04
7223	Abuse Class III	08
7222	Abuse Class II - Non-Accidental Act	04
7222	Abuse Class II - Non-Accidental Act	04
7222	Abuse Class II - Non-Accidental Act	04
7222	Abuse Class II - Non-Accidental Act	08
7111	Family Dignity and Respect	14
7083	Humane-Treatment Environment	14
7082	Sanitary/Human-Treatment Environment	07
7080	Services suited to Condition	03
7080	Services suited to Condition	07
7080	Services suited to Condition	07
1708	Dignity & Respect	07

Agency: Walter Reuther Psychiatric Hospital

Rights Advisors: Patricia Jolly and David Scott

Section I: Complaint Data Summary:

Part A: Totals

Allegations Involved	570
Allegations Investigated	46
Substantiated	25

Part B: Aggregate Summary

1. Freedom from Abuse

Code	Category	Received	Investigation	Intervention	Substantiated
7221	Abuse Class I	1	1	0	0
7222	Abuse Class II	23	23	0	1
7223	Abuse Class III	7	7	0	0
7224	Sexual Abuse	2	2	0	0

2. Freedom from Neglect

Code	Category	Received	Investigation	Intervention	Substantiated
7225	Neglect Class I	0	0	0	0
7226	Neglect Class II	1	1	0	1
7227	Neglect Class III	1	1	0	1

3. Rights Protection System

Code	Category	Received	Investigation	Intervention	Substantiated
7760	Access to Rights System	0	0	0	0
7545	Retaliation/Harassment	0	0	0	0
7060	Notice/Explanation of Rights	0	0	0	0
7780	Complaint Investigation Process	0	0	0	0
7840	Appeal Process	0	0	0	0
7880	Mediation	0	0	0	0
7520	Failure to Report	0	0	0	0

4. Admission/Discharge/Second Opinion

Code	Category	Received	Investigation	Intervention	Substantiated
7050	Second Opinion - Denial of Services	0	0	0	0
4090	Second Opinion - Denial of Hospitalization	0	0	0	0
4980	Objection to Hospitalization (minor)	0	0	0	0
4190	Termination of Voluntary Hospitalization (adult)	1	0	1	0
4630	Independent Clinical Examination	0	0	0	0
4510	Court Hearing/Process	16	0	16	0

5. Civil Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7041	Civil Rights: Discrimination, Accessibility, Accommodation, etc	1	0	1	0
7044	Religious Practice	2	0	2	0
7045	Voting	0	0	0	0
7047	Presumption of Competency	0	0	0	0
7048	Marriage/Divorce	0	0	0	0

6. Family Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7111	Dignity & Respect	0	0	0	0
7112	Receipt of General Education Information	0	0	0	0
7113	Opportunity to provide information	0	0	0	0

7. Communication & Visits

Code	Category	Received	Investigation	Intervention	Substantiated
7261	Visitation	2	0	2	0
7262	Contact with Attorneys or others regarding legal matters	1	0	1	0
7263	Access to telephone, mail	7	0	7	0
7264	Funds for postage, stationery, telephone usage	0	0	0	0
7265	Written and posted limitations, if established	0	0	0	0
7266	Uncensored Mail	3	0	3	0
7267	Access to entertainment materials, information, news	2	0	2	1

8. Confidentiality/Privileged Communications/Disclosure

Code	Category	Received	Investigation	Intervention	Substantiated
7481	Disclosure of Confidential Information	1	1	0	1
7485	Withholding of Information (includes Recipient access to records)	1	0	1	0
7486	Correction of Record	0	0	0	0
7487	Access by P & A to records	0	0	0	0
7501	Privileged Communication	0	0	0	0

9. Treatment Environment

Code	Category	Received	Investigation	Intervention	Substantiated
7081	Safety	48	4	44	4
7082	Sanitary	14	0	14	0
7083	Humane	10	0	10	0
1708	Dignity & Respect	56	2	54	6
7085	Nutrition	18	0	18	1
7086	Least Restrictive Setting	0	0	0	0

10. Freedom of Movement

Code	Category	Received	Investigation	Intervention	Substantiated
7441	Restrictions/Limitations	51	0	51	0
7400	Restraint	1	1	0	1
7420	Seclusion	0	0	0	0

11. Financial Rights

Code	Category	Received	Investigation	Intervention	Substantiated
7301	Safeguarding Money	0	0	0	0
7302	Facility Account	9	0	9	0
7303	Easy Access to Money in Account	0	0	0	0
7304	Ability to Spend or Use as Desired	0	0	0	0
7305	Delivery of Money upon Release	1	0	1	0
7360	Labor & Compensation	0	0	0	0

12. Personal Property

Code	Category	Received	Investigation	Intervention	Substantiated
7281	Possession and Use	13	0	13	0
7282	Storage Space	0	0	0	0
7283	Inspection at Reasonable Times	0	0	0	0
7284	Search/Seizure	1	0	1	0
7285	Exclusions	0	0	0	0
7286	Limitations	1	0	1	0
7287	Receipts to Recipient and to Designated Individual	0	0	0	0
7288	Waiver	0	0	0	0
7289	Protection	20	0	20	4

13. Suitable Services

Code	Category	Received	Investigation	Intervention	Substantiated
7080	Treatment suited to condition	233	3	230	4
7049	Treatment by spiritual means	0	0	0	0
7100	Physical and mental exams	0	0	0	0
7130	Choice of physician/mental health professional	0	0	0	0
7140	Notice of clinical status/progress	0	0	0	0
7150	Services of mental health professional	0	0	0	0
7003	Informed Consent	0	0	0	0
7170	Electro Convulsive Therapy (ECT)	0	0	0	0
7160	Surgery	0	0	0	0
7180	Psychotropic Drugs	9	0	9	0
7190	Notice of medication side effects	0	0	0	0
7029	Information on Family Planning	0	0	0	0

14. Treatment Planning

Code	Category	Received	Investigation	Intervention	Substantiated
7121	Person-Centered Process	0	0	0	0
7122	Timely development	0	0	0	0
7123	Requests for Review	0	0	0	0
7124	Participation by Individual(s) of choice	0	0	0	0
7125	Assessment of Needs	0	0	0	0

15. Photographs, Fingerprints, Audiotapes, One-way Glass

Code	Category	Received	Investigation	Intervention	Substantiated
7241	Prior Consent	0	0	0	0
7242	Identification	0	0	0	0
7243	Objection	0	0	0	0
7244	Release to others/return	0	0	0	0
7245	Storage/Destruction	0	0	0	0
7246	Treatment	0	0	0	0

17. No Right Involved

Code	Category	Received
0000	No Right Involved	9

18. Outside Provider Jurisdiction

Code	Category	Received
0001	Outside Provider Jurisdiction	4

570

46

511

25

Remedial Action Key					
01	Verbal Counseling	06	Staff Transfer	10	Policy Revision/Development
02	Written Counseling	07	Training	11	Environmental Repair /Enhancement
03	Written Reprimand	08	Employment Termination	12	Plan of Service Revision
04	Suspension	08*	Employee left the agency, but substantiated	13	Recipient Transfer to Another Provider/Site
05	Demotion	09	Contract Action	14	Other

Remedial Action Taken for Walter Reuther Psychiatric Hospital

Code	Category	Action Taken
7481	Disclosure of Confidential Information	03
7400	Restraint	04
7289	Personal Property Protection	07
7289	Personal Property Protection	11
7289	Personal Property Protection	14
7289	Personal Property Protection	14
7267	Access to enter., materials, infor., news	01
7227	Neglect Class III	04
7226	Neglect Class II	11
7222	Abuse Class II - Non-Accidental Act	08
7085	Nutrition	12
7081	Safety-Treatment Environment	13
7081	Safety-Treatment Environment	13
7081	Safety-Treatment Environment	07
7081	Safety-Treatment Environment	13
7080	Services suited to Condition	03
7080	Services suited to Condition	11
7080	Services suited to Condition	07
7080	Services suited to Condition	07
1708	Dignity & Respect	02
1708	Dignity & Respect	03
1708	Dignity & Respect	01
1708	Dignity & Respect	07
1708	Dignity & Respect	01
1708	Dignity & Respect	01

Rights Training Provided by Field Unit Staff to Consumers

The Office of Recipient Rights supports education of consumers in addition to staff. ORR staff at DCH operated hospitals and centers carried out a variety of informational sessions when they, or consumers, identified issues of concern. A summary of these trainings is provided in the chart below:

Hospital/Center	Attendees
Caro Center	109
Center for Forensic Psychiatry	276
Hawthorn Center	360
Kalamazoo Psychiatric Hospital	0
Mt. Pleasant Center	76
Walter Reuther Psychiatric Hospital	1622
Total	2443

Rights Training Provided by Field Unit Staff at DCH Facilities

The Mental Health Code requires that all DCH staff receive training related to recipient rights protection within 30 days of hire. At each of the state psychiatric hospitals, centers for persons with developmental disabilities, and the Center for Psychiatry, the rights staff assigned to the facility are carrying out this mandate, using curricula developed by the Training Unit. This training is a priority for rights staff, and is so essential that it has been established as an objective in the management plans of each field office. The following summarizes the trainings provided at each facility.

Hospital/Center	Attendees
Caro Center	61
Center for Forensic Psychiatry	11
Hawthorn Center	254
Kalamazoo Psychiatric Hospital	17
Mt. Pleasant Center	478
Walter Reuther Psychiatric Hospital	118
MDCH- Central Office	1196
Total	2135

DCH RECIPIENT RIGHTS APPEALS COMMITTEE

Background

The Michigan Mental Health Code at Section 774 states, “The director shall appoint an appeals committee consisting of 7 individuals, none of whom shall be employed by the department or a community mental health services program, to hear appeals of recipient rights matters. The committee shall include at least 3 members of the state recipient rights advisory committee and 2 primary consumers.” The DCH Appeals Committee reviews appeals of rights complaints filed by or on behalf of patients/residents of state hospitals/centers. Additionally, it reviews appeals submitted by or on behalf of individuals who are or have been patients in one of the 46 licensed private psychiatric hospitals/units (LPH/U) who have entered into an agreement to use the department’s appeals committee in lieu of appointing its own.

Following is a data summary of activity for the DCH Appeals Committee for FY 2006/2007:

Total By Number of Cases Reviewed 15

Appeals Committee five day Review Decisions

Cases received that were not heard	0
Appeals filed > 45 day time frame	1
Cases stating no ground for appeal	0
Cases misfiled/referred back to local CMHSP/LPH	2

Total Number Appeals heard from State Hospitals/Centers 7

Caro Center	4
Walter Reuther	1
Mt. Pleasant Center	1
Kalamazoo Psychiatric Hospital	1

Total Number Appeals heard from LPH/Us 8

Chelsea Hospital	3
St. Lawrence	2
Marquette General Hospital	1
William Beaumont Hospital	1
Fieldstone	1

Appeals Committee Decision on Appeals Heard 15

Upheld findings of rights office and action taken	7
Returned to responsible ORR for re-investigation	4
Returned to facility for different or additional action	4

Progress on DCH-ORR Field Unit Goals and Objectives for FY 2006 - 2007

GOAL I: To assure a uniformly high standard in the protection of the rights of recipients.

Objective A: To complete 80% of Reports of Investigative Findings (RIFs) within 75 days of receipt of complaints.

1. All staff will be sent weekly open case reports to identify timelines and due dates.
2. A monthly report will be sent to the unit supervisor to monitor RIF timelines and progress towards the objective.

PROGRESS TOWARDS OBJECTIVE A:

For the period of 4/01/07 to 9/30/07 Reports of Investigative findings were completed within 75 days of receipt 85% of the time across all facilities. 71% of Reports of Investigative Findings were completed with 60 days of receipt and 97% were completed within the statutorily required 90 days. This objective has been met.

GOAL II: To empower recipients to fully exercise their rights.

Objective A: To identify areas for improvement in person-centered planning (PCP) at DCH operated hospitals and centers.

1. Continue participation by field unit staff in the PCP Workgroup charged with creating a uniform policy for using PCP in the development of the Individual Plan of Service for those persons receiving services at a DCH operated hospital or center. This workgroup has also been charged with creating a uniform PCP training curriculum.
2. Each Rights Advisor will follow a minimum of one individual through the treatment planning process, including annual meetings, updates, special staffings, etc., at their prospective hospital or center from 4/01/07 until 9/30/07 or until discharge. All documentation related to planning for the individual will be kept by the Rights Advisor.
3. The field unit will meet quarterly to discuss staff and consumer training opportunities identified and process changes that may be needed.

PROGRESS TOWARDS OBJECTIVE A:

The workgroup has completed a policy for the development of the Individual Plan of Service (IPOS) and has begun working on a IPOS template to be used at all state operated hospitals and centers, excluding Mt. Pleasant Center. The workgroup will continue to meet to finish the IPOS template, as well as address training of staff once the policy and attached form have been completed and approved by the Director of the Department of Community Health.

Fourteen individuals receiving services at the state operated hospitals and centers were followed through the treatment planning process across facilities from 4/01/07 until 9/30/07 or until discharge. The following recommendations were made based upon common areas that were identified in the PCP process as opportunities for improvement or training:

- 1) More recipient involvement in development of the plan.
- 2) More recipient training regarding PCP.
- 3) More staff training regarding PCP.
- 4) Use of independent facilitators during treatment planning meetings.
- 5) Better identification and use of recipients' choices and preferences in plan development.

DCH-ORR Field Unit Goals and Objectives for FY 2007 - 2008

GOAL I: To assure a uniformly high standard in the protection of the rights of recipients.

Objective A: To complete 90% of Reports of Investigative Findings (RIFs) within 75 days of receipt of complaints.

1. All staff will be sent weekly open case reports to identify timelines and due dates.
2. A quarterly report will be sent to the unit supervisor to monitor RIF timelines and progress towards the objective.

GOAL II: To empower recipients to fully exercise their rights.

Objective A: To implement policy and procedures for improvement in person-centered planning (PCP) at DCH operated hospitals and centers.

1. Continue participation by Field Unit staff in the PCP Workgroup charged with creating a uniform policy for using PCP in the development of the Individual Plan of Service for those persons receiving services at a DCH operated hospital or center. This workgroup has also been charged with creating a uniform PCP training curriculum.
2. Develop a training curriculum for recipients to increase their knowledge of PCP and IPOS development.
3. The Field Unit will meet quarterly to discuss staff and consumer training opportunities identified and process changes that may be needed.

PART II – TRAINING UNIT

Overview

The ORR Training Unit develops and presents instructional programs with the goal of providing consistent implementation of recipient rights protection processes across the state.

In order to carry out this mission, the Unit provides training to rights staff from DCH facility rights offices, licensed private hospital/units (LPH/U), community mental health service providers (CMHSP) and their contract agencies. These classes focus on providing the skills necessary to assure that the rights of recipients in their jurisdiction will be fully protected. In addition, the Unit offers educational programs for persons, other than rights staff, who are involved in the recipient rights arena (Recipient Rights Advisory Committee and Recipient Rights Appeals Committee members, staff from other state and advocacy agencies, staff of service providers) and whose roles, although ancillary in nature, are essential to preserving and promoting the rights of recipients.

The Training Unit, in collaboration with the steering committee, composed of representatives of state and local rights offices, has responsibility for planning and implementing the Recipient Rights Conference. This annual event brings together staff and recipients from across the state to discuss current issues related to recipient rights and provides an opportunity for rights staff to fulfill their statutorily mandated annual training requirements in a forum which will enhance their job performance.

Another function of the Training Unit is to coordinate the education provided by DCH-ORR staff in hospital and centers operated by the Department of Community Health. These trainings are focused on (1) meeting the mandate that all staff hired by the Department receive training on recipient rights within the first thirty (30) days of hire, and (2) adhering to the policy requirement that hospital and center staff are provided annual in-service training. Education of consumers receiving services in DCH operated facilities on Mental Health Code protected rights is also a function of the DCH-ORR staff; the Training Unit provides oversight in this area, as well.

Educational Offerings

The Michigan Mental Health Code at Section 774 states, “Technical assistance and training in recipient rights protection are available to all community mental health services programs and other mental health service providers subject to this act.” Several training opportunities were offered in FY 2006/2007. “*Basic Skills*,” a three-part, 36 hour, program provides training and skill development required to carry out the rights officer’s/advisor’s responsibilities mandated in Chapters 7 and 7A of the Mental Health Code.

The three-day long Part 1 focuses on the role of the rights office, its interaction with other segments of the agency and consumers, and the requirements of the job. The second part was expanded to 1 ½ days and concentrates on the skills necessary to do a thorough and effective investigation and write a Report of Investigative Findings as required by the Code. The last segment of the curriculum, “*Developing Effective Rights Training*,” is a two-day session designed to develop the rights officer’s/advisor’s skills necessary to train agency and provider staff on recipient rights issues. It includes both the principals of training and a review of required training content.

Developing Issues Training is a comprehensive review of the requirements for effective report writing. It provides attendees a chance to reexamine and reapply the major components of the report format.

Recipient Rights Advisory Committee training provides the information necessary for committee members to function effectively and carry out their mandated role as advocates for the ORR office and staff.

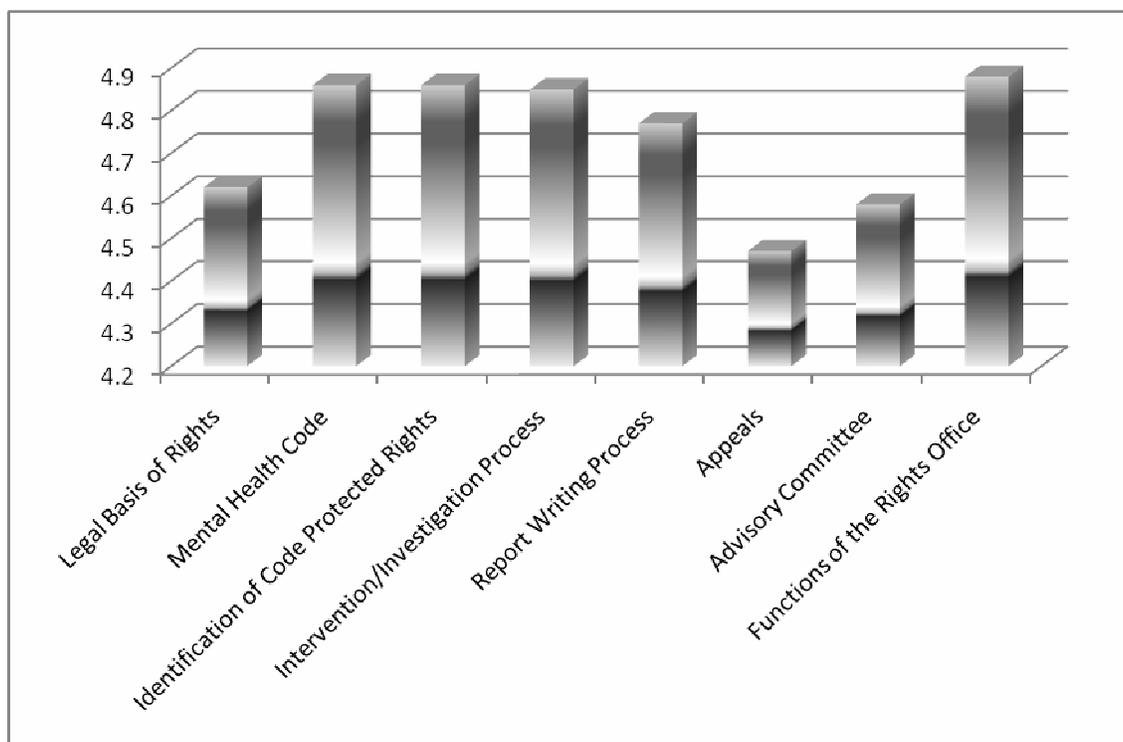
Appeals Committee training takes participants through the appeals process and provides the tools necessary to conduct a fair and impartial appellate review. The following is a summary of the sessions, and program attendance, offered during FY 2006/2007.

<u>Title of Course</u>	Date Conducted	Attendees
Basic Skills Training, Part I	November 2006	18
Basic Skills Training, Part I	February 2007	13
Basic Skills Training, Part I	April 2007	8
Basic Skills Training, Part I	June 2007	7
Basic Skills Training, Part I	September 2007	22
Total		68
Art of Investigation	November 2006	11
Art of Investigation	February 2007	14
Art of Investigation	April 2007	7
Art of Investigation	June 2007	5
Art of Investigation	September 2007	20
Total		57
Developing Effective Rights Training	October 2006	19
Developing Effective Rights Training	November 2006	10
Developing Effective Rights Training	March 2007	15
Developing Effective Rights Training	July 2007	7
Total		51
Other Trainings		
Advisory Committee	March 2007	16
Report Writing (DWCCMHA)	March 2007	35
Appeals Committee	July 2007	17
RRAC & Appeals Committee	August 2007	14
Total		123
Grand Total		258

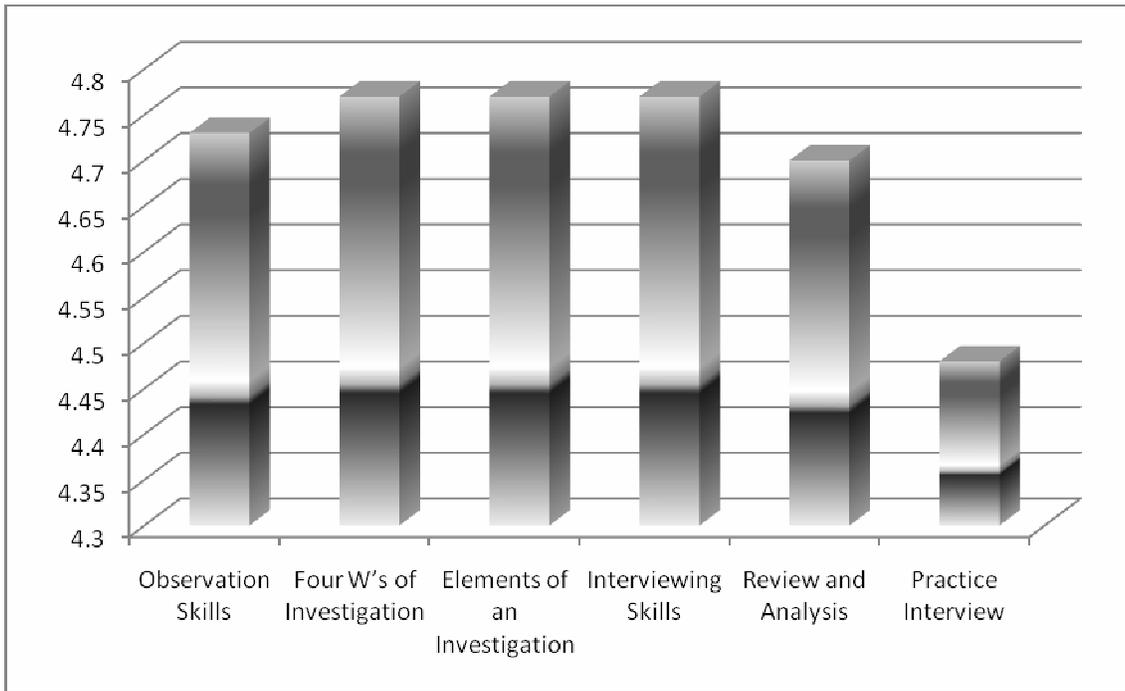
Evaluations

Following each training session, the Training Unit received evaluations of the training presented. Following are compilations of the evaluation data for FY 2006-2007. The evaluation is based on a scale of 1 to 5, with 5 being “excellent,” and 1 being “poor.” The program objectives were added to the evaluations for each session this year. 100 % of the attendees indicated that programs met the objectives indicated.

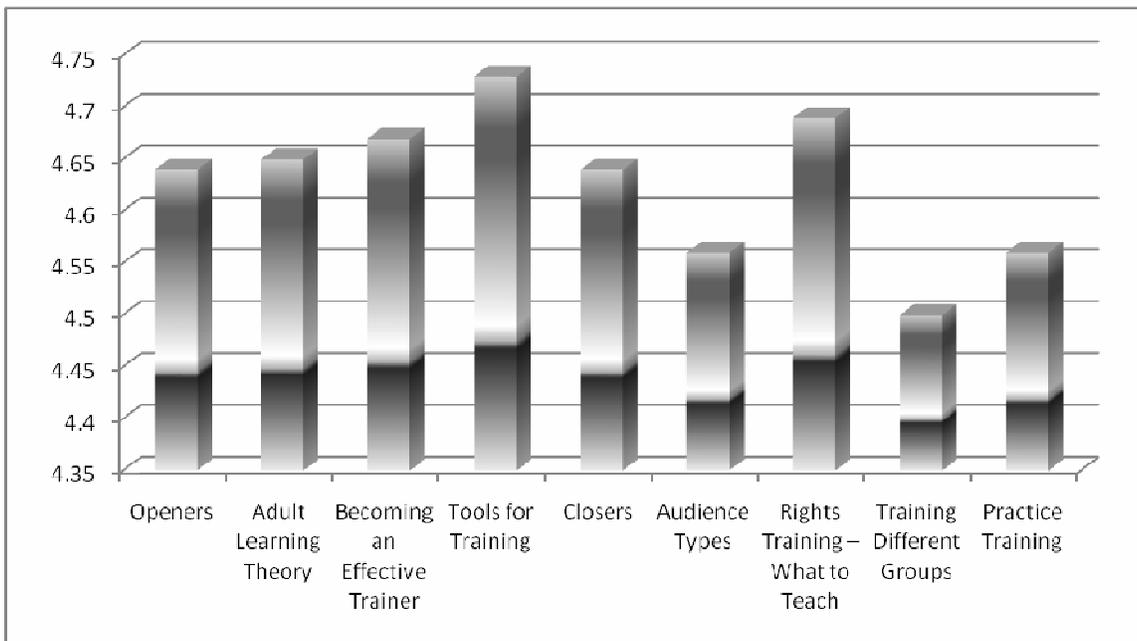
Basic Skills Training Part I Evaluation Ratings



**Basic Skills Training Part II
Evaluation Ratings**

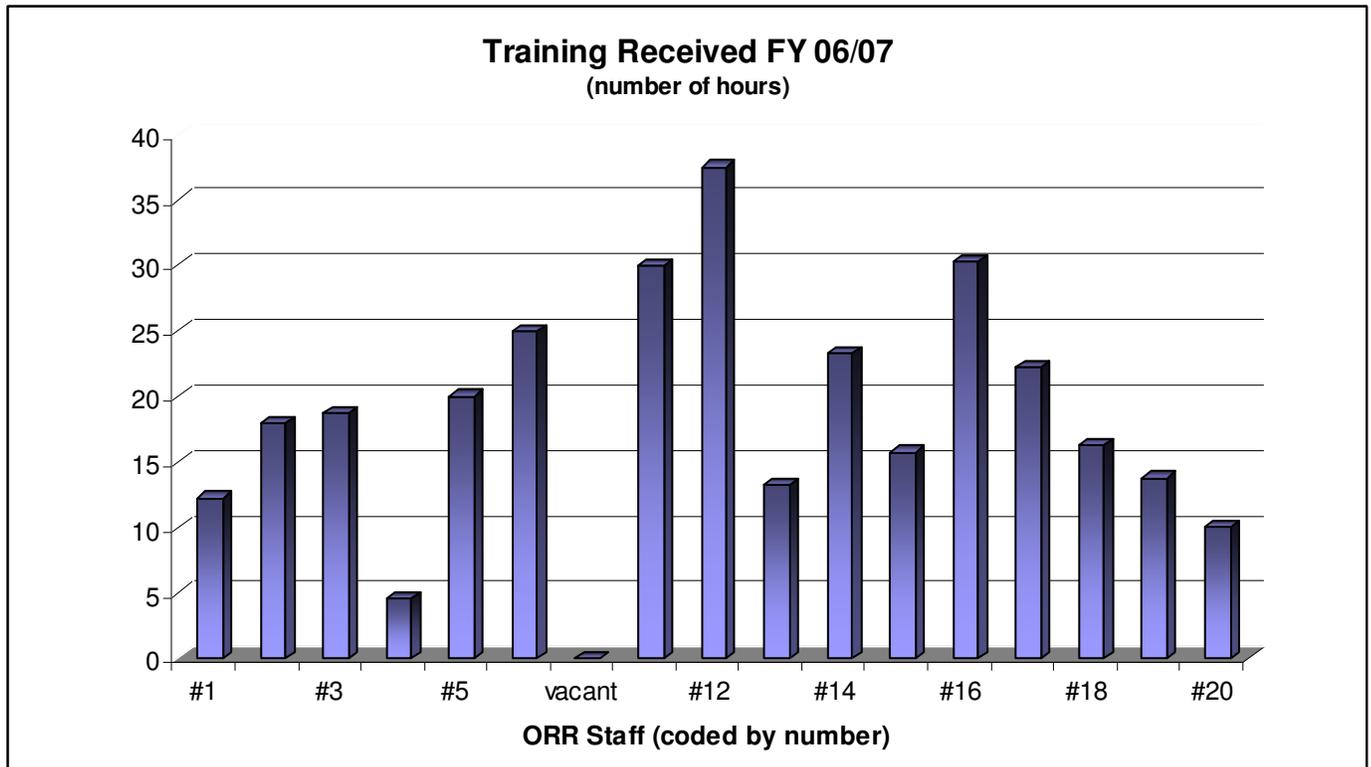


**Basic Skills Training Part III
Developing Effective Rights Training
Evaluation Ratings**



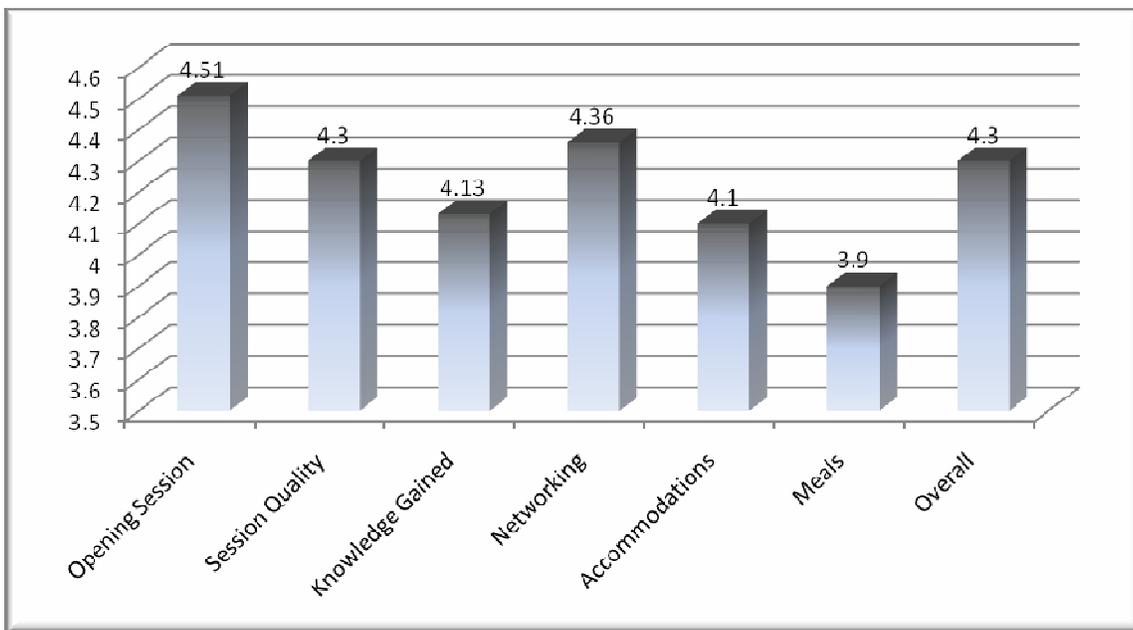
Training Received by Staff of the State Office of Recipient Rights

The Office of Recipient Rights staff are required to receive education in rights protection on an annual basis. Training opportunities for Department staff include, but are not limited to, the Annual Recipient Rights Conference, held each October, quarterly offerings by the Recipient Rights Officers Association of Michigan, and the three-part, 36 hour recipient rights officers program, which includes Basic Skills, Art of Investigation, and Developing Effective Rights Training. The following chart indicates the number of hours of training Department ORR staff received during FY 06/07. Staff listed in the chart reflect ORR administrative staff, field staff, training staff specialists, as well as support staff.



2006 Recipient Rights Conference: The Road to Rights

The 13th Annual Recipient Rights Conference was held October 10 – 13, 2006, at the Crowne Plaza Hotel, in Grand Rapids, Michigan. Approximately 320 individuals attended. The Rights Conference is self-funded, using no Department financial resources for its support. Through the conference scholarship program, mental health consumers from across the state are provided the opportunity to attend the sessions; the conference covers the cost of registration while hotel accommodations and travel expenses are provided by the sponsoring CMHSP. In 2006, 32 consumers attended the conference under this sponsorship. For the second year, recipients from across the state were asked to submit photos of their art or craftwork, 13 of which were chosen to be depicted on a calendar produced by the conference. For the first time, the conference was approved for continuing education units for Michigan Social Workers by the Michigan Social Work Continuing Education Collaborative. The 2006 conference featured 27 wide-ranging sessions with topics as varied as Motivational Interviewing, Anti-Bias Education (in conjunction with the Anti-Defamation League of Michigan), Gender Differences in the Workplace, several sessions on dealing with stigma and a history of mental health services in Michigan. The pre-conference session focused on working with disabled persons who were victims of crime. Responses to the conference evaluation indicated an overall satisfaction level of 4.49 on a scale of 1 to 5. These responses, and the areas they evaluated, are depicted in the graph below:



During FY 06, the Training Unit created and implemented a recipient rights training for DCH Central Office staff. Over 1300 staff went through this program by the end of 2007. This training will be provided to all persons hired by DCH Central Office on an ongoing basis.

Progress on DCH-ORR Training Unit Goals and Objectives for FY 2006 - 2007

GOAL I: Through education, develop a uniformly high standard of rights protection across the state by assuring that a standardized training program on the operation of a recipient rights office is developed and made available to community (CMHSP) and hospital (LPH/U) rights staff.

Objective A: Assure that a standardized training program on the operation of a recipient rights office is developed and made available to community (CMHSP) and hospital (LPH/U) rights staff.

1. Establish training dates for FY 06-07 so that availability enables potential attendees to meet the standards of the MHC and master contract.

PROGRESS: Completed

2. Schedule Training programs at appropriate locations

PROGRESS: Completed

3. Review “Basic skills” curriculum

PROGRESS: Completed

4. Review curriculum for “Art of Investigation” training

PROGRESS: Completed

5. Review “Developing Effective Rights Training” curriculum

PROGRESS: Completed

6. Review curriculum for “Issues” training

PROGRESS: Completed

7. Revise course materials and print materials, as necessary

PROGRESS: Completed

8. Implement Training Programs

PROGRESS: Completed

GOAL II: Enhance consumer knowledge about their rights related to mental health services.

Objective A: Develop a process for provision of rights education to consumers and family members at DCH hospitals and centers

1. Develop training modules using internet and computer-based modalities.

PROGRESS: Not completed due to lack of funding

GOAL III: Provide an annual educational conference for rights staff, consumers, and other professionals in rights related fields

Objective A: Oversee the development and implementation of the 2007 Recipient Rights Conference.

1. Coordinate monthly steering committee meetings

PROGRESS: Completed

2. Select theme

PROGRESS: Completed

3. Select speakers

PROGRESS: Completed

4. Coordinate site logistics

PROGRESS: Completed

5. Finalize arrangements with speakers

PROGRESS: Completed

6. Finalize AV equipment

PROGRESS: Completed

7. Review conference evaluations and prepare a written summary

PROGRESS: Completed

Goal IV: Provide rights education, as required by the MHC, to staff of DCH Central Office

Objective A. Develop processes for orientation of new Central Office DCH employees to the recipient rights system and the requirements of the Mental Health Code

1. Revise training curriculum to accommodate web-based learning principles

PROGRESS: Completed

2. Work with Human Resources (HR) and Michigan Public Health Institute (MPHI) to implement web-based recipient rights training for all DCH staff

PROGRESS: Completed

Goal V: Provide rights education and information to staff at DCH operated Hospitals and Centers

Objective A. Provide technical and development assistance to ORR staff as they conduct mandatory rights education for staff at DCH hospitals and centers

1. Conduct face-to-face new hire training programs as required

Progress: *Completed*

2. Training Unit provides technical assistance as required

Progress: *Completed*

DCH-ORR Training Unit Goals and Objectives for FY 2007/2008

Goal I: Assure a uniformly high standard in the protection of rights of recipients

Objective A: Through education, assure that a standardized training program on the operation of a recipient rights office is developed and made available to community (CMHSP) and hospital (LPH/U) rights staff.

Goal II: Promote the rights of recipients through education and training of providers and interested others

Objective A: In conjunction with the DCH-ORR Community Rights Unit, establish minimum content standards for new hire rights training based upon employee types.

Objective B: In conjunction with the DCH-ORR Community Rights Unit, complete development and implement RMHA Director training

Objective C: Establish process to assure that all DCH and community staff, as applicable, are trained in any legislative or regulatory changes impacting on recipient rights.

Objective D: Provide rights education, as required by the MHC, to staff of DCH Central Office

Objective E: Provide rights education and information to staff at DCH operated Hospitals and Centers

Objective F: Provide an annual educational conference for rights staff, consumers, and other professionals in rights related fields

Goal III: Empower recipients to fully exercise their rights

Objective A: Enhance consumer knowledge about their rights related to mental health services.

PART III - COMMUNITY RIGHTS UNIT

CMHSP Rights Systems Assessments

Section 755 of the Michigan Mental Health Code requires the establishment of an office of recipient rights in each community mental health services program (CMHSP).

Chapter 2 of the Mental Health Code requires that the Department of Community Health promulgate rules to establish standards for certification and the certification review process for CMHSPs. Administrative Rule 330.2801 requires the department to assess the CMHSPs compliance with certification standards by determining the degree to which all of the following provisions apply:

- a) The CMHSP has established processes, policies and procedures necessary to achieve the required result.
- b) The established processes, policies and procedures are properly implemented.
- c) The expected result of the processes, policies and procedures is being achieved.

The Mental Health Code also requires that DCH, through its Office of Recipient Rights established pursuant to Section 754 of the statute, review the CMHSP rights systems in order to "ensure a uniformly high standard of recipient rights protection throughout the state."

The certification standards must include those for the protection and promotion of recipient rights (MCL 330.232a[1][b]). Although standards as to matters of CMHSP governance, resource management, quality improvement, service delivery and safety management may be waived by the department in whole or in part as the result of the CMHSP's accreditation by a nationally recognized accrediting body, this is not the case relative to standards established by the department in regard to the protection and promotion of recipient rights.

Assessment Process

Each CMHSP recipient rights system is assessed annually by two ORR Community Rights Specialists through careful review of and follow-up on semi-annual and annual reports prepared by each CMHSP rights office and submitted by their executive director. Annually, the Rights Specialists also conduct an onsite assessment of approximately one-third of the CMHSPs. This three day, onsite review includes an entrance conference; interviews with the executive director, rights office staff, consumers, CMHSP staff and staff of contract providers, Recipient Rights Advisory and Appeals Committee members; compliance review of complaint case files, logs, Code-mandated reports and notices, appeals cases; review of contract language to ascertain clarity as to how rights will be protected during the contract period and training requirements; compliance review of all twenty-two rights-related policies required by the Code; site visits to a representational sample of CMHSP directly operated and contracted service; and an exit conference. Site visits are also made to the licensed psychiatric hospital/unit (LPH/U) under contract with the CMHSP. Areas of non-compliance with Code and Rules evidenced by the rights system at the LPH/U are cited in the CMHSP assessment report. Additionally, if a serious deficiency were found, this would also be reported to the Psychiatric Licensing Consultant with the Department of Community Health.

Assessments Results 2007

Fifteen (15) CMHSP rights protection systems were evaluated through onsite assessments conducted by the Office of Recipient Rights Community Rights Unit Specialists from March 2007 through December 2007. Beginning in March of 2001, a rights system was scored as being in less than substantial compliance, even if the overall score was in the range of substantial compliance, if the Specialists determined that a deficiency which was previously cited in the last assessment had not been corrected at the time of the current assessment. CMHSPs that were scored in this manner have an * in the table which follows. Evidence that the repeat citation has been corrected must be provided to DCH-ORR within 30 days of receipt by the CMHSP of the assessment report.

In 2007, as a means of more expediently identifying in which specific areas the CMHSP rights system excelled or had difficulty, Attachment A, Standards, was reformatted to reflect the weighting of particular standards. The previous Attachment A standards were organized into eight (8) separate sections, each with its own weighted multiplier specified as follows:

<u>Section</u>	<u>Multiplier</u>
Section I: The Office of Recipient Rights	1.00
Section II: Contracts	0.85
Section III: ORR Requirements	1.072
Section IV: Semi & Annual Report	0.30
Section V: Policies	0.75
Section VI: RRAC	0.75
Section VII: Complaint Investigation and Resolution	1.25
Section VIII: Appeal/Dispute Resolution	1.25

The multiplier reflects the weighted difficulty or complexity of the standards contained in each section. Each standard was still scored at 2 points for full compliance, 1 point for partial compliance and 0 points for non-compliance. The minimum score required for substantial compliance with established standards was again 277.0 out of a possible 292, evidencing a 95% compliance rate.

Full Compliance (FC) = 292 points
Substantial Compliance (SC) = 277 to 291 points
Less than Substantial Compliance (LSC) = Less than 277 points

2007 Rights System Assessment Results

Date	CMHSP	Score	Results
3/20 - 3/22	CMH Services of Muskegon County	288	SC
4/17 - 4/19	Saginaw County CMH Authority	266	LSC
5/8 - 5/10	Lapeer County CMH Services	292	FC
5/22 - 5/24	Pines Behavioral Health Services	280.2	SC
6/5 - 6/7	Northern Lakes CMH Authority	287.2	SC
6/26 - 6/28	CMH Services of St. Joseph County	282.6	LSC*
7/10 - 7/12	North Country CMH	276.5	LSC*
7/31 - 8/2	Network 180 (Kent County)	276	LSC
8/14 - 8/16	Hiawatha Behavioral Health	288.3	SC
8/28 - 8/30	AuSable Valley CMH Services	284.5	SC
9/11 - 9/13	Genesee County CMH Services	292	FC
10/16 - 10/18	Shiawassee County CMH Authority	287	SC
11/6 - 11/8	VanBuren CMH Authority	287	SC
11/27 - 11/29	CMH Authority of Clinton-Eaton-Ingham Counties	290.7	SC
12/11 - 12/13	Barry County CMH Authority	292	FC

Pilot Licensed Hospital Rights System Assessments

The Michigan Mental Health Code, P.A. 258 of 1974, established the Michigan Department of Community Health, Office of Recipient Rights (DCH/ORR), its functions and its responsibilities. The primary mandates of the office are (1) to provide direct rights protection services to individuals admitted to the state operated psychiatric hospitals and centers for developmental disabilities, (2) to provide technical assistance and training to all mental health service providers subject to the Michigan Mental Health Code and (3) to assess and monitor the quality and effectiveness of the rights protection systems in Michigan's community mental health service programs and licensed hospitals.

In December 2003, Governor Jennifer M. Granholm issued Executive Order 2003-24 establishing the Michigan Mental Health Commission. One of the charges of the Commission was to recommend options to improve the organization, delivery, quality, and effectiveness of publicly supported mental health services. In its final report to the Governor, dated October 15, 2004, the Commission issued a number of recommendations, two of which are pertinent here: **Recommendation #49** which states the state rights office should develop uniform methodology in programs for state wide use in the protection of recipient rights under the state Mental Health Code, and **Recommendation #56** which states legislative changes should be made that would permit the state rights office to investigate and make recommendations to the MDCH Bureau of Health Systems regarding the recipient rights program of licensed hospitals.

In conjunction with the Department's Bureau of Health Systems, DCH-ORR proposed a pilot project wherein the ORR would conduct on-site assessments of the rights protection systems in participating licensed hospitals using standards developed from provisions of the Michigan Mental Health Code, DCH Administrative Rules and DCH-ORR protocols.

The goals and objectives of the pilot assessment project were three-fold:

1. To promote and protect recipient rights
2. To ensure a uniformly high standard of recipient rights protection throughout the State of Michigan
3. To ensure that licensed hospitals in the state maintain and implement in written policies and practice the rights of recipients guaranteed by the Michigan Mental Health Code and MDCH Administrative Rules.

The benefits and anticipated outcomes included:

1. Participation in the pilot would afford the participating licensed hospitals the opportunity to give valuable input into any DCH-ORR recipient rights assessment process that may be required in the future.
2. Participating licensed hospitals would receive in depth technical assistance and consultation in providing quality and comprehensive rights protection services.
3. Participating hospitals would have the opportunity to bring their recipient rights protection system into full compliance with standards established by the department's Office of Recipient Rights prior to any future legislative mandate resulting from Recommendation 49 and 56 made by the Mental Health Commission in its October 15, 2004 Final Report to Governor Granholm.
4. The MDCH Bureau of Health Systems would receive a specifically focused review of the recipient rights protection systems at the licensed hospitals.
5. DCH-ORR will be better able to establish a uniformly high standard of recipient rights protection at licensed hospitals.

On April 30, 2007, a memo signed by John Sanford, DCH-ORR Director, and Jan Christensen, Senior Deputy Director, Health Policy, Regulation and Professions Administration, was sent to the Hospital Administrator for each of the licensed hospitals in Michigan. The memo was an invitation for the hospitals' participation in the pilot assessment project as part of the cooperative partnership between the DCH-ORR and the DCH Bureau of Health Systems which licenses them. As of May 18, 2007, fourteen (14) hospitals responded. Of the fourteen, five (5) hospitals were selected to participate in the pilot assessment process. Those selected were Pine Rest Christian Behavioral Health Services (PR) in Grand Rapids, Henry Ford - Macomb (HFM) in Mt. Clemens, Owosso Memorial Hospital (OM) in Owosso, Henry Ford Kingswood (HFK) in Ferndale and Henry Ford Wyandotte (HFW) in Wyandotte.

Pine Rest (PR) was assessed on July 30, 2007 by DCH-ORR Community Rights Specialists Angie O'Dowd, Mark Mishal and Dianne Baker, DCH-ORR Director of Community/Field Operations. Henry Ford-Macomb (HFM) was assessed on September 24, 2007 by the same individuals as was Owosso Memorial (OM) on October 15, 2007. The Henry Ford-Kingswood (HFK) assessment was conducted on November 15, 2007 by O'Dowd and Mishal and Henry Ford-Wyandotte (HFW) on December 6, 2007 by Baker and Mishal.

The on-site rights system assessment process was conducted in one day at each of the participating licensed hospitals as follows:

1. Entrance conference
2. Complaint case file review
3. Appeal case file review
4. Interviews – rights advisor and alternate, hospital director/designee, member of the Recipient Rights Advisory Committee and Appeals Committee.
5. Conference with and technical assistance to rights advisor on results of policy and complaint file compliance reviews
6. Tour of unit
7. Exit conference at which time the licensed hospital was informed of the results of the assessment

Within 30 business days from the date of the assessment, DCH-ORR sent the licensed hospital a written assessment report which identified items of partial or non-compliance and actions that were required to be taken to correct the deficiency. A copy of the assessment report was also sent to the Psychiatric Licensing Consultant with the Bureau of Health Systems. Within 30 business days of receipt of the report, the licensed hospital submitted to DCH-ORR a plan of correction addressing any deficiencies identified. Upon review by the DCH-ORR Community Rights Specialists, each hospital's plan of correction was found:

1. To provide clear and specific responses to each deficiency and required action indicated in the assessment report;

2. Assured implementation of corrective action across the entire service delivery system;
3. Included reasonable and specific dates certain for future completion of each component not already completed by the time of the submission of the plan; and
4. Included documentation and/or other appropriate evidence of implementation of corrective action taken.

**Summary of Findings
Attachment A - Standards**

During the assessment process, Attachment A is the primary protocol used by the DCH-ORR assessors. Attachment A contains standards for the rights protection system established by the Mental Health Code, Administrative Rules and applicable federal regulations. There are seven separate sections that are weighted based upon complexity. These are:

Section I:	The Office of Recipient Rights	Points = 30 Multiplier = 1
Section II:	ORR Requirements	Points = 26 Multiplier = 1.072
Section III:	Semi and Annual Reports	Points = 6 Multiplier = .30
Section IV:	Policies	Points = 36 Multiplier = .75
Section V:	Recipient Rights Advisory Committee	Points = 14 Multiplier = .75
Section VI:	Complaint Investigation and Resolution	Points = 130 Multiplier = 1.25
Section VII:	Appeal/Dispute Resolution	
	B.1 Licensed Hospital Uses DCH Appeals Cmtee	Points = 5 Multiplier = 1.25
	B.2 Licensed Hospital Has Own Appeals Cmtee	Points = 30 Multiplier = 1.25

All licensed hospitals except Pine Rest have entered into an agreement to use the DCH Appeals Committee. For purposes of analysis, Pine Rest was considered as receiving full compliance on Section VII, B.1, allowing 5 points versus 30 points.

Table 1. – Attachment A Standards

None of the participating licensed hospitals achieved substantial compliance. The areas of least compliance were Section IV. Policies and Section VI. Complaint Investigation and Resolution.

Pine Rest Christian Mental Health Services = PR Full Compliance (FC) = 247
 Henry Ford Macomb = HFM Substantial Compliance(SC)=234.7↑
 Henry Ford Kingswood = HFK Less Than SC (LSC) = 234.6↓
 Henry Ford Wyandotte = HFW
 Owosso Memorial = OM

Section	PR	HFM	HFK	HFW	OM	Score Possible
I. Office of Recipient Rights	29	30	30	29	30	30
Section	PR	HFM	HFK	HFW	OM	Score Possible
II. ORR Requirements	23.6	24	24	23	24	26
III. Semi/Annual Reports	6	6	6	6	6	6
IV. Policies	32.3	31.5	32.3	30	34.5	36
V. RRAC	14	14	14	14	14	14
VI. Complaint Investigation and Resolution	107.5	112.5	113.5	120	115	130
VII. Appeal/Dispute Resolution	5	5	5	5	5	5
Total Score	216.4 LSC	225.1 LSC	227.1 LSC	228.7 LSC	230.5 LSC	247

As a result of the assessment process and provision of technical assistance and consultation to the licensed hospital rights advisors and hospital/unit directors/designees by DCH-ORR, the anticipated benefits and outcomes are considered as met. The DCH-ORR Community Rights Specialists continue to provide the rights advisors assistance in completion of the hospital's plan of correction, focusing on policy compliance and quality investigation and reporting skills.

On March 18, 2008, the pilot assessment report was submitted to Janet Olszewski, DCH Director, Ed Dore, DCH Chief Deputy Director, Michael Head, Interim Deputy Director for the Mental Health/Substance Abuse Services Administration, Nick Lyon, Deputy Director for the Health Policy, Regulation and Professions Administration, Michael Dankert, Director of the Bureau of Health Systems, Darryl Horton, Director of the Division of Licensing and Certification, Bureau of Health Systems and Alex Dukay, Psychiatric Licensing Consultant with the Division of Licensing and Certification, Bureau of Health Systems.

In the March 18, 2008 report, DCH-ORR made the following recommendations:

In furtherance of the following recommendations by the Michigan Mental Health Commission, i.e.

#49 – The state rights office should develop uniform methodologies and programs for statewide use in the protection of recipient rights under the state's Mental Health Code.

#56 – Legislative changes should be made that would permit the state rights office to investigate and make recommendations to the MDCH Bureau of Health Systems regarding the recipient rights program of licensed hospitals.

as well as the mandates of the Michigan Mental Health Code on the Department of Community Health and its Office of Recipient Rights, the pilot licensed hospital recipient rights system assessments has resulted in the following recommendations by DCH-ORR:

1. Under the authority granted to the Director of the Department of Community Health in MCL 330.1134(2) to "...coordinate all functions within state government affecting psychiatric hospitals, and ... cooperate with other state agencies that establish standards or requirements for facilities providing mental health care...", it is recommended that the DCH Director designate DCH-ORR to biennially conduct recipient rights system assessments at psychiatric hospitals/units licensed by the department for licensure purposes. This designation would "... assure necessary, equitable, and consistent state regulation of these facilities without duplication of inspection or services." (MCL 330.1134[2]). This recommendation is further supported by Recommendation #49 made by the Michigan Mental Health Commission.

2. MCL 330.1753(1) currently states:

"The department shall review the recipient rights system of each community mental health services program in accordance with standards established under section 232a, to ensure a uniformly high standard of recipient rights protection throughout the state. For purposes of certification review, the department shall have access to all information pertaining to the rights protections system of the community mental health services program."

This subsection should be amended to indicate:

"IN ORDER TO ENSURE A UNIFORMLY HIGH STANDARD OF RECIPIENT RIGHTS PROTECTION THROUGHOUT THE STATE, the- DEPARTMENT'S

OFFICE OF RECIPIENT RIGHTS shall review the recipient rights system of each community mental health services program in accordance with standards established under section 232a, **AND EACH HOSPITAL LICENSED UNDER SECTION 137 IN ACCORDANCE WITH STANDARDS ESTABLISHED UNDER SECTION 755.** For purposes of certification **OR LICENSURE** review, the **STATE OFFICE OF RECIPIENT RIGHTS** shall have access to all information pertaining to the rights protections system of the community mental health services program **OR LICENSED HOSPITAL.”**

This recommendation is further supported by Recommendation #56 made by the Michigan Mental Health Commission.

3. In order to effectuate Recommendations 1. and 2., the department must establish an additional FTE Community Rights Specialist in the DCH-ORR Community Rights Unit. The position would be responsible for the biennial recipient rights system assessments at all psychiatric hospitals or units licensed by the department.

Information and Referral

The Rights Information Analyst is responsible for the provision of all information and referral services including systematic data collection, entry and analysis relative to these services as well as the semi-annual and annual reports received from the CMHSPs and licensed private psychiatric hospitals.

Complaints received at the Department Office in Lansing are referred to the rights office having jurisdiction over the matter. Data was collected regarding the number of letters received by the office during FY 2005/2006. There were 367 written complaints referred through the Department of Community Health Office of Recipient Rights in Lansing.

The Rights Information Analyst also acts as support to the Training Unit, Community Rights Specialists and the ORR Director of Community and Field Operations. The Information Analyst maintains the Rights Advisors/Officers Directory, available via e-mail and the DCH website. DCH-ORR also maintains a mass e-mail directory, which includes all CMHSP rights offices and all LPH/U rights advisors.

Training Conducted By Community Rights Unit Staff

Developing Issues	October 2006	13
Appeals Committee/Mock Appeals Training	October 2006	18
Developing Issues	November 2006	10
Psychiatric Advance Directives	February 2007	15
Psychiatric Advance Directives	March 2007	20
RRAC & Appeals Committee	August 2007	7
CMHSP Executive Director Training	June 2007	40
Total		123

Progress on Community Rights Unit Goals and Objectives for FY 06/07

Goal I: Assure a uniformly high standard in the protection of rights of recipients

Objective A: Establish minimum standards for site monitoring

1. Establish a workgroup of stakeholders to draft the minimum standards
2. Finalize standards following stakeholder review
3. Disseminate to rights offices at DCH, CMHSPs and LPH/Us

Progress: *Completed. Workgroup of CMHSP/LPH Rights Officers/Advisors was established and was facilitated by Angie O’Dowd, DCH-ORR Community Rights Specialist. Minimum standards were established for use by the CMHSP for contracted program sites and for LPH/Us under contract to the CMHSP. Site monitoring forms were disseminated to the CMHSPs and LPH/Us in January 2008.*

Objective B: Enhance usefulness of the DCH-ORR Annual Report on the status of rights protection in Michigan

1. Establish Annual Report Data Workgroup
2. Identify additional data sets needed to:
 - (a) Determine patterns and trends
 - (b) Determine performance indicators for rights protection systems

Progress: *Completed. Workgroup of CMHSP/LPH Rights Officers/Advisors was established and was facilitated by Mark Mishal, CH-ORR Community Rights Specialist. Enhancements to the semi and annual report formats were done to allow for more expedient trending by DCH-ORR and to allow for comparative analysis by the CMHSPs and LPH/Us. SEE APPENDIX A for new annual report format.*

Objective C: In conjunction with the DCH Bureau of Health Systems, pilot a rights system assessment at licensed hospitals

1. Submit a concept paper for the assessment process for approval by DCH Director and Deputy Director of Health Policy, Regulation and Professions Administration
2. Send letter to licensed hospital directors inviting participation
3. Conduct rights system assessment

Progress: *Completed. See narrative summary, Part III, pages 49-55*

Goal II: Promote the rights of recipients through education and training of providers and interested others

Objective A: Provide training to CMHSP Executive Directors on how to assure a quality rights protection system

Progress: *Pending completion of curriculum by DCH-ORR Training Division*

Objective B: Conduct special topic training

Progress: *Pending completion of curriculum by DCH-ORR Training Division*

DCH-ORR Community Rights Unit Goals and Objectives for FY 2007/2008

Goal I: Assure a uniformly high standard in the protection of rights of recipients

Objective A: Obtain authority to conduct bi-annual rights system assessments of licensed LPH/Us.

Objective B: Data will be reported in a consistent and uniform manner in semi and annual rights reports.

Goal II: Promote the rights of recipients through education and training of providers and interested others

Objective A: In conjunction with the DCH-ORR Training Unit, establish minimum content standards for new hire rights training based upon employee types.

Objective B: In conjunction with the DCH-ORR Training Unit, complete development and implement RMHA Director training

PART IV - REVIEW OF BUDGETARY ISSUES

The Michigan Mental Health Code at MCL 330.1754(2) (a) states in pertinent part:

The department shall ensure all of the following:

The process for funding the state office of recipient rights includes a review of the funding by the state recipient rights advisory committee.

This section of the law is best justified by the 1979 Mental Health Administrative Rule 7037(2) which states...

The Office shall have sufficient staff and other resources to perform its functions throughout the agency's system of services.

In 1996 this section of the Administrative Rules was rescinded leaving little or no guidance as to how the Office of Recipient Rights should be funded. The present spending plan for the Office of Recipient does not detail the present financial resources that are available to the Office to carry out its statutorily mandated functions.

As example, if the Office needed new computer equipment, the office has to look to the Mental Health and Substance Abuse line item for Computer Equipment to determine if funding is available for its use. This line item is under the control of the Deputy Director, Mental Health and Substance Abuse Services Administration and not the Office of Recipient Rights. A detailed independent budget for the Office of Recipient Rights would allow the Recipient Rights Advisory Committee to more thoroughly review the Office's funding to determine if it is adequate to meet the fiscal needs of the Office. Additionally, this would enhance the Office's ability to function as an independent operation free of undue influence and allow the office greater ability for future planning.

Below is the Office of Recipient Rights Spending Plan for 2007:

MENTAL HEALTH AND SUBSTANCE ABUSE FY 2007 SPENDING PLAN					
Expenditures	DCH 0016	Period of Performance	Index	GF/GP PCA 10000/10001	Medicaid PCA Various
Description	(X)				
Office of Recipient Rights		10/01/06-9/30/07	20170		
Salary & Fringe FTE = 20.0				1,857,900	
CSS&M				75,000	
ORR Printing				20,000	
Travel				70,000	
Total				\$2,022,900	\$0

PART V - RECOMMENDATIONS to the DEPARTMENT

1. The Department of Community Health should “endeavor to ensure” that the Office of Recipient Rights “has sufficient staff and other resources necessary to perform its functions.” *Although applicable to all three ORR units, this is especially critical in the Field Unit, which provides direct rights protection services to patients and residents in state hospitals and centers. Rights advisory staff there must be sufficient in number to assure that they can not only respond reactively to allegations of rights violations through investigation and intervention, but can engage in proactive activities such as consumer training and education, staff training and education, consultation and monitoring for the purpose of promoting recipient rights and educing the number of violations.*
2. The Department of Community Health should establish clear statutory and contractual sanctions to be taken against a CMHSP for its failure to achieve substantial compliance with standards established by the department for the protection and promotion of recipient rights.
3. The proposed Mental Health Code amendments submitted to the department by this Office in January 2007 should be placed as a priority on the DCH Legislative Agenda for FY 2008/2009.
4. The Office of Human Resources Unit should coordinate with ORR to develop a process that assures all DCH employees receive training in recipient rights and the rights protection process within 30 days of hire.
5. The Mental Health Code should be amended to include the requirement that this Office as well as rights offices in CMHSPs and licensed private psychiatric hospitals/units provide rights training to consumers of mental health services and their legal representatives, e.g. concepts and elements of person-centered planning, rights of recipients under Chapter 7 of the Mental Health Code, the complaint resolution process under Chapter 7A and consumer/beneficiary rights to access the Medicaid and Non-Medicaid grievance, appeal and fair hearing processes.
6. The Department of Community Health take action on recommendations 1 through 3 contained in Part III, Pilot Licensed Hospital Rights System Assessments.
7. The Department of Community Health should support the statutory authority of this Office to establish compliance standards, practice standards, outcome expectations and uniform performance measures necessary to assure a uniformly high standard of rights protection in this state. *The Office requires such authority in order to implement and enforce these standards independent of approval by any entity that may exert undue pressure that could interfere with the impartial, even-handed and thorough performance of its duties under the Mental Health Code*

PART VI- STRATEGIC PLAN 2007 - 2008

Strategic Objective I	Tactics	Action Plan	Assignment	Progress	Timeframe
To assure a uniformly high standard in the protection of the rights of recipients.	1. Obtain authority to conduct bi-annual rights system assessments of LPH/Us		Baker		3/3/08
	2. Implement amended Mental Health Code	Shepard	Sanford		12/30/08
	3. Implement Repeat Rights Event Review Process at DCH		Sanford, Baker, Postema, Mishal		3/3/08
	4. Establish minimum content standards for new hire rights training; all categories of employees		Mishal, O'Dowd, Baker, Postema, Silver		6/01/08
	5. Obtain approval and implement uniform DCH Rights Policies and Procedures		Baker, Postema, Sanford		3/3/08
	6. Explore avenues for support, both internally and externally, to promote uniform rights protection for recipients in state operated facilities.		Sanford, Baker, Postema		1/2/08
	7. Establish a rights system Process Improvement Team to address deficiencies in current rights protection system in Michigan's public mental health system		Baker, Postema, Sanford		6/01/08

Strategic Objective II	Tactics	Action Plan	Assignment	Progress	Timeframe
To promote the rights of recipients through education and training of providers and interested others.	1. Develop curricula consistent with minimum content standards for rights training for new hires	a. Submit content for residential staff training to DHS-OCAL for curriculum review and approval	Mishal, O'Dowd, Silver, Baker		6/01/08
	2. Complete development and implement RMHA Director training		Mishal, O'Dowd, Baker, Postema, Silver		4/1/08
	3. Establish process to assure that all DCH and community staff, as applicable, are trained in any legislative or regulatory changes impacting on recipient rights		Silver, Sanford		3/3/08

Strategic Objective III	Tactics	Action Plan	Assignment	Progress	Timeframe
To empower recipients to fully exercise their rights.	1. Implement Peer Support Specialist Project.		Baker, Postema, Sanford		2/1/08
	2. Coordinate with RMHAs to promote inclusion of Recovery components into PCP process		Baker, Postema		6/1/08

**Michigan Department of Community Health
Recipient Rights Data Report**

Agency: Agency Name

CMHSP's: Indicate DCH assigned two-digit CMHSP Board Number: #

Officer: B6 put your name

Reporting Period: 10/1/2007 to 9/30/2008

- Annual**
- Semi-Annual**

Section I: *Complaint Data Summary:*

Part A: Totals

Complaints Received	
Allegations Involved	0
Allegations Investigated	0
Substantiated	0

Complaint Source

Recipient	
Staff	
ORR	
Guardian/Family	
Anonymous	
Community/General Public	
Total	0 (this will self-fill & should = C14)

Completed Investigations

	Total	≤30	≤60	≤90	>90
Abuse/Neglect	0				
All others	0				

Part B: Aggregate Summary

1. Freedom from Abuse

Code	Category	Received	Investigation	Intervention	Interventions Substantiated	Investigations Substantiated	Recipient Population		
							MI	DD	SED
7221	abuse class I								
72221	abuse class II - nonaccidental act								
72222	abuse class II - unreasonable force								
72223	abuse class II - emotional harm								
72224	abuse class II - treating as incompetent								
72225	abuse class II - exploitation								
7223	abuse class III								
7224	abuse class I - sexual abuse								

2. Freedom from Neglect

Code	Category	Received	Investigation	Intervention	Interventions Substantiated	Investigations Substantiated	Recipient Population		
							MI	DD	SED
72251	neglect class I								
72252	neglect class I - failure to report								
72261	neglect class II								
72262	neglect class II - failure to report								
72271	neglect class III								
72272	neglect class III - failure to report								

3. Rights Protection System

Code	Category	Received	Investigation	Intervention	Interventions Substantiated	Investigations Substantiated	Recipient Population		
							MI	DD	SED
7060	notice/explanation of rights								
7520	failure to report								
7545	retaliation/harassment								
7760	access to rights system								
7780	complaint investigation process								
7840	appeal process/mediation								
7060	notice/explanation of rights								

4. Admission/Discharge/Second Opinion

Code	Category	Received	Investigation	Intervention	Interventions Substantiated	Investigations Substantiated	Recipient Population		
							MI	DD	SED
7050	Second Opinion - Denial of Services								
4090	Second Opinion - Denial of Hospitalization								
4980	Objection to Hospitalization (minor)								
4190	Termination of Voluntary Hospitalization (adult)								
4630	Independent Clinical Examination								
4510	Court Hearing/Process								

5. Civil Rights

Code	Category	Received	Investigation	Intervention	Interventions Substantiated	Investigations Substantiated	Recipient Population		
							MI	DD	SED
7041	Civil Rights: Discrimination, Accessibility, Accommodation, etc						MI	DD	SED
7044	Religious Practice								
7045	Voting								
7047	Presumption of Competency								
7048	Marriage/Divorce								

6. Family Rights

Code	Category	Received	Investigation	Intervention	Interventions Substantiated	Investigations Substantiated	Recipient Population		
							MI	DD	SED
7111	Dignity & Respect								
7112	Receipt of General Education Information								
7113	Opportunity to provide information								

7. Communication & Visits

Code	Category	Received	Investigation	Intervention	Interventions Substantiated	Investigations Substantiated	Recipient Population		
							MI	DD	SED
7261	Visitation								
7262	Contact with Attorneys or others regarding legal matters								
7263	Access to telephone, mail								
7264	Funds for postage, stationery, telephone usage								
7265	Written and posted limitations, if established								
7266	Uncensored Mail								
7267	Access to entertainment materials, information, news								

8. Confidentiality/Privileged Communications/Disclosure

Code	Category	Received	Investigation	Intervention	Interventions Substantiated	Investigations Substantiated	Recipient Population		
							MI	DD	SED
7481	Disclosure of Confidential Information								
7485	Withholding of Information (includes Recipient access to records)								
7486	Correction of Record								
7487	Access by P & A to records								
7501	Privileged Communication								

9. Treatment Environment

Code	Category	Received	Investigation	Intervention	Interventions Substantiated	Investigations Substantiated	Recipient Population		
							MI	DD	SED
7081	Safety								
7082	Sanitary								
7083	Humane								
1708	Dignity & Respect								
7085	Nutrition								
7086	Least Restrictive Setting								

10. Freedom of Movement

Code	Category	Received	Investigation	Intervention	Interventions Substantiated	Investigations Substantiated	Recipient Population		
							MI	DD	SED
7441	Restrictions/Limitations								
7400	Restraint								
7420	Seclusion								

11. Financial Rights

Code	Category	Received	Investigation	Intervention	Interventions Substantiated	Investigations Substantiated	Recipient Population		
							MI	DD	SED
7301	Safeguarding Money								
7302	Facility Account								
7303	Easy Access to Money in Account								
7304	Ability to Spend or Use as Desired								
7305	Delivery of Money upon Release								
7360	Labor & Compensation								

12. Personal Property

Code	Category	Received	Investigation	Intervention	Interventions Substantiated	Investigations Substantiated	Recipient Population		
							MI	DD	SED
7281	Possession and Use								
7282	Storage Space								
7283	Inspection at Reasonable Times								
7284	Search/Seizure								
7285	Exclusions								
7286	Limitations								
7287	Receipts to Recipient and to Designated Individual								
7288	Waiver								
7289	Protection								

13. Suitable Services

Code	Category	Received	Investigation	Intervention	Interventions Substantiated	Investigations Substantiated	Recipient Population		
							MI	DD	SED
7080	Treatment suited to condition								
7049	Treatment by spiritual means								
7100	Physical and mental exams								
7130	Choice of physician/mental health professional								
7140	Notice of clinical status/progress								
7150	Services of mental health professional								
7003	Informed Consent								
7170	Electro Convulsive Therapy (ECT)								
7160	Surgery								
7180	Psychotropic Drugs								
7190	Notice of medication side effects								
7029	Information on Family Planning								

14. Treatment Planning

Code	Category	Received	Investigation	Intervention	Interventions Substantiated	Investigations Substantiated	Recipient Population		
							MI	DD	SED
7121	Person-Centered Process								
7122	Timely development								
7123	Requests for Review								
7124	Participation by Individual(s) of choice								
7125	Assessment of Needs								

15. Photographs, Fingerprints, Audiotapes, One-way Glass

Code	Category	Received	Investigation	Intervention	Interventions Substantiated	Investigations Substantiated	Recipient Population		
							MI	DD	SED
7241	Prior Consent								
7242	Identification								
7243	Objection								
7244	Release to others/return								
7245	Storage/Destruction								
7246	Treatment								

17. No Right Involved

Code	Category	Received
0000	No Right Involved	

insert the same number

⇒

18. Outside Provider Jurisdiction

Code	Category	Received
0001	Outside Provider Jurisdiction	

insert the same number

⇒

0 0 0 0 0 0 0

Part C: Remediation of Substantiated Rights Violations (includes complaints investigated and those addressed through other interventions) Attach Additional sheets as necessary.			
Code	Category	Type of Provider	Type of Remedial Action

SECTION II: TRAINING ACTIVITY

Part A: Training Received by Office Staff

Staff Name	Topic	# Hours (length of training)

Please use this template to identify methods used in training on the Annual Report in Section II B Training Provided by Rights Office in Column G. Use as many as apply.

Method of Training	
Face-to-Face	01
Video	02
Computer	03
Paper	04
training includes face to face follow up	05
Other (please describe)	

SECTION II: TRAINING ACTIVITY

Part B: Training Provided by Rights Office

Is Update Training Required? Yes ___ No ___

If Yes, how often: (Annual, Every 2 years, etc.) _____

Topic	# Hours	# Agency Staff	# Contractual Staff	# and Type Other Staff	# of Consumers	Method of Training

SECTION III: DESIRED OUTCOMES FOR THE OFFICE & PROGRESS OF PREVIOUS OUTCOMES

Progress on Outcomes established by the office for FY 07/08

1.		
	<input type="checkbox"/> Accomplished <input type="checkbox"/> Ongoing	Comments:
2.		
	<input type="checkbox"/> Accomplished <input type="checkbox"/> Ongoing	Comments:
3.		
	<input type="checkbox"/> Accomplished <input type="checkbox"/> Ongoing	Comments:

Outcomes established by the office for FY 08/09:

1.	
2.	
3.	

SECTION IV: RECOMMENDATIONS TO THE GOVERNING BOARD

The Advisory Committee recommends the following:

1.	
2.	
3.	