STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION (X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:			(X2) MULTIPLE CONSTRUCTION A. BUILDING:				
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20140058			B. WING		07	07/07/2021	
	ROVIDER OR SUPPLIER	2000	ET ADDRESS, CITY, S				
STRATEG	IC BEHAVIORAL CENTE	R-GARNER	WATERFIELD DR NER, NC 27529	IVE			
(X4) ID	SUMMARY ST	ATEMENT OF DEFICIENCIES	ID	PROVIDER'S PLAN OF CO	DRRECTION		
PREFIX TAG	REGULATORY OR L	Y MUST BE PRECEDED BY FULL SC IDENTIFYING INFORMATION)	PREFIX TAG	(EACH CORRECTIVE ACTION CROSS-REFERENCED TO THE DEFICIENCY)	N SHOULD BE APPROPRIATE	COMPLE DATE	
V 114	completed on 7/07/21 unsubstantiated (Intal NC00178774, NC001 NC00177440) Deficiel This facility is licensed category: 10A NCAC 2 Residential Treatment Adolescents. 27G .0207 Emergency 10A NCAC 27G .0207 E AND SUPPLIES (a) A written fire plan for area-wide disaster plan shall be approved by the authority. (b) The plan shall be staff and evacuation is shall beposted in the fact) Fire and disaster dri shall be held at least que estaff and evacuation is shall be held at least que estaff and evacuation is shall be held at least que estaff and evacuation is shall be held at least que estaff and evacuation is shall be held at least que estaff and evacuation is shall be held at least que estaff and evacuation is shall be held at least que estaff and evacuation shall be staff and evacuation is shall be held at least que estaff and evacuation is shall be held at least que estaff and evacuation is shall be held at least que estaff and evacuation is shall be not met as accessible for use.	and follow-up survey was . The complaints were & # NC00164658, 178699, NC00178447, ncies were cited. If for the following service 27G. 1900 Psychiatric for Children and Plans and Supplies EMERGENCY PLANS or each facility and in shall be developed and ine appropriate local made available to all procedures and routes incility. ills in a 24-hour facility uarterly and shall be Drills shall be conducted mulate fire emergencies. ave basic first aid supplies evidenced by: and interview the facility disaster drills were held		Please note that Strategic Behave Raleigh takes these findings ser- committed towards developing e for compliance with regulations and evaluation activities to ensu with same. Pursuant to your request, the coare delineated in the following p a) The procedure for preventing and implementing the acceptable correction for the specific deficit b) The date by which all correctic completed, and the monitoring syplace. c) The monitoring procedure to explan of correction is effective, and deficiency cited remains corrected compliance with the regulatory red) The title of the person responsibility implementing the acceptable plan (V114 starts here) a) The procedure for preventing the acceptable plan correction for the specific desidentified. 1) A new Environment of Conference of the departs completed to include all and disaster drills. 2) A schedule was developed implemented for the requisional disaster drills. 2) A schedule was developed implemented and kept in Any fire or disaster drills per schedule will be additive CEO.	iously and is fully ffective strategies and monitoring re compliance rrective actions attern: the deficiency e plan of ency identified, we actions will be in mure that the d that the specific d and/or in equirements. The for of correction. g the deficiency table plan of efficiency ficiency Care (EOC) an immediate ment was required fire end and wired drills. Is are a binder, as not completed	b) 8/21/20	
R		cility records revealed:					

STATE FORM

Division of Health Service Regulation

CEO

Division of Health Service Regulation STATEMENT OF DEFICIENCIES (X1) PROVIDER/SUPPLIER/CLIA (X2) MULTIPLE CONSTRUCTION (X3) DATE SURVEY AND PLAN OF CORRECTION IDENTIFICATION NUMBER: COMPLETED A. BUILDING: B. WING 20140058 07/07/2021 NAME OF PROVIDER OR SUPPLIER STREET ADDRESS, CITY, STATE, ZIP CODE 3200 WATERFIELD DRIVE STRATEGIC BEHAVIORAL CENTER-GARNER GARNER, NC 27529 (X4) ID SUMMARY STATEMENT OF DEFICIENCIES PROVIDER'S PLAN OF CORRECTION (X5) PREFIX (EACH DEFICIENCY MUST BE PRECEDED BY FULL PREFIX (EACH CORRECTIVE ACTION SHOULD BE COMPLETE REGULATORY OR LSC IDENTIFYING INFORMATION) TAG CROSS-REFERENCED TO THE APPROPRIATE TAG DATE DEFICIENCY) V 114 Continued From page 1 c) The monitoring procedure to ensure that the plan V 114 of correction is effective, and that the specific -Fire Drills were completed only three times in the deficiency cited remains corrected and/or in compliance with the regulatory requirements. last twelve months on their second shift -No Disaster Drills completed within the last The EOC Director or designee during monthly twelve months. Quality/PI Council meetings will report out the results of fire and disaster drills. A summary of the Interview on 6/22/21 the Environment of Care findings is being forwarded to the Medical Executive Director (EOC) stated: Committee and Governing Board at each of their Started job on 6/14/21. respective meetings. - No disaster drills had been done. - Joined the Safety-Environment of Care d) The title of the person responsible for Committee and noted the need for fire and implementing the acceptable plan of correction. disaster drills. - Developed a fire and disaster drill schedule to EOC Director. meet the requirements. (V114 ends here). -The facility had two twleve hour shifts. V 314 27G .1901 Psych Res. Tx. Facility - Scope V 314 10A NCAC 27G .1901 SCOPE (a) The rules in this Section apply to psychiatric residential treatment facilities (PRTF)s. (b) A PRTF is one that provides care for children or adolescents who have mental illness or substance abuse/dependency in a non-acute inpatient setting. (c) The PRTF shall provide a structured living environment for children or adolescents who do not meet criteria for acute inpatient care, but do require supervision and specialized interventions on a 24-hour basis. (d) Therapeutic interventions shall address functional deficits associated with the child or adolescent's diagnosis and include psychiatric treatment and specialized substance abuse and mental health therapeutic care. These therapeutic interventions and services shall be designed to address the treatment needs necessary to facilitate a move to a less intensive community setting.

Charles Charles Comment	of Health Service Regu					
	ATEMENT OF DEFICIENCIES (X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:		570 C 100 C	PLE CONSTRUCTION G:	(X3) DATE SURVEY COMPLETED	
	20140058				07/0	07/2021
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	The second second		R, NC 27529			
(X4) ID PREFIX TAG	(EACH DEFICIENC)	ATEMENT OF DEFICIENCIES Y MUST BE PRECEDED BY FULL SC IDENTIFYING INFORMATION)	ID PREFIX TAG	PROVIDER'S PLAN OF CORRECTION (EACH CORRECTIVE ACTION SHOULD CROSS-REFERENCED TO THE APPROPR DEFICIENCY)	BE	(X5) COMPLETE DATE
V 314	for whom removal from community-based rest to facilitate treatment. (f) The PRTF shall condition of the PRTF shall be the following; Joint Conference of Healthcare Organiz Accreditation of Rehalt Council on. Accreditate accrediting bodies as Medical Assistance Clir Psychiatric Residential including subsequents A copy of Clinical Police	erve children or adolescents m home or a idential setting is essential pordinate with other ies within the child or nt area. The accredited through one of immission on Accreditation ations; the Commission on bilitation Facilities; the ion or other national set forth in the Division of nical Policy Number 8D-1, I Treatment Facility, amendments and editions. By Number 8D-1 is available ision of Medical Assistance	V 314	The procedure for preventing the deficient implementing the acceptable plan of correct the specific deficiency identified. 1) A new Interim Director of Clinical States (IDCS) has been hired. 2) The Interim Director of Clinical (IDCS) or designee will provide each her clinical team by 8/21, regal expectations of following the conducting individual, family and session to include documentation of staff that has not completed the training by 8/21, will be removed schedule. The monitoring procedure to ensure that the correction is effective, and that the deficiency cited remains corrected accompliance with the regulatory requirement	ervices I Services ducation to arding the schedules, or group fall. Any e required from the	a) 8/21/2021
	failed to provide menta	v and interview, the facility I health therapeutic care. dited clients (#1,#2, & #3). deekday Schedule" :00 am daily.		1) The IDCS or designee will conduct random audits of the medical record there is documentation of all required 2) The IDCS or designee will do weekly ensure the program schedules an followed to include group sessions. 3) The IDCS or designee will report results of the audits. A summary of the is being forwarded to the Quality/PI Medical Executive Committee and G Board at each of their respective meeting the acceptable plan of correct Interim Director of Clinical Services (IDCS). (V 314 ends here).	to ensure sessions. audits to re being out the efindings Council, Governing ngs.	

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Division of Health Service Regulation STATEMENT OF DEFICIENCIES (X1) PROVIDER/SUPPLIER/CLIA (X2) MULTIPLE CONSTRUCTION (X3) DATE SURVEY AND PLAN OF CORRECTION **IDENTIFICATION NUMBER:** COMPLETED A. BUILDING: B. WING 20140058 07/07/2021 NAME OF PROVIDER OR SUPPLIER STREET ADDRESS, CITY, STATE, ZIP CODE 3200 WATERFIELD DRIVE STRATEGIC BEHAVIORAL CENTER-GARNER GARNER, NC 27529 SUMMARY STATEMENT OF DEFICIENCIES (X4) ID PROVIDER'S PLAN OF CORRECTION (X5) COMPLETE (EACH DEFICIENCY MUST BE PRECEDED BY FULL PRFFIX **PREFIX** (EACH CORRECTIVE ACTION SHOULD BE REGULATORY OR LSC IDENTIFYING INFORMATION) TAG TAG CROSS-REFERENCED TO THE APPROPRIATE DATE DEFICIENCY) V 314 | Continued From page 3 V 314 -Diagnoses of Major Depressive Disorder (MDD), Attention Deficit with Hyperactive Disorder (ADHD) and Oppositional Defiant Disorder (ODD) Interview on 6/21/21 client #1 stated: -The therapist was not doing a "good job." -A few weeks ago they got in trouble because some of the girls had items and were using them to cut themselves. -There were only eight of twelve kids that were self harming during that situation. -Was upset because the Therapist held a group and said, "I am going to address this as a group since you are doing it as a group." -Felt this was not fair to everyone because they were not a part of the self harm and she was telling everyone's business during that group. -The Therapist should have addressed the situation individually with them instead of in a group. -They did not always get their individual therapy as they were supposed to. B. Review on 7/7/21 of client #2's record revealed: -Admitted 5/12/21 -Age 17 -Diagnoses of Major Depressive, recurrent severe w/o psychotic features Interview on 7/7/21 client #2's guardian refused to give consent for client to be interviewed. C. Review on 7/07/21 of client # 3's record revealed: - Admitted: 4/15/21 - Age: 15 - Diagnosis: Disruptive mood Dysregulation disorder

Division of Health Service Regulation

Division of Health Service Regulation STATEMENT OF DEFICIENCIES (X1) PROVIDER/SUPPLIER/CLIA (X2) MULTIPLE CONSTRUCTION (X3) DATE SURVEY AND PLAN OF CORRECTION IDENTIFICATION NUMBER: A. BUILDING: _ COMPLETED B. WING 20140058 07/07/2021

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V 314	Continued From page 4	V 314		
	Interview on 6/22/21 client #3 stated:			
	- Group Therapy sessions were supposed	d to be		
	every day at 11:00am and last for an hour	·.		
	- Had not had group therapy sessions on	some		
	days.			
	- Therapist had been too busy to have gro	ups.		
	- Individual sessions were supposed to be			
	and hadn't had consistent weekly session			
	- Was supposed to have a family session,	the		
	Therapist showed up late missed the sess	sion and		
	it hasn't been rescheduled.			
	-Asked Therapist if she could talk to her S	unday		
	and Monday and she said, "yes," but never available to talk.	er was		
	-Asked Therapist today to talk and she sai	d ab a		
	was "too busy."	d she		
	-She hasn't had a individual session since	heing		
	in the facility the first couple of weeks.	being		
	-It had been two months and two weeks si	nce last		
	individual therapy session.	1100 1400		
	-She had received packages (self assessi	ment		
	sheets, coloring sheets) from the Therapis	t.		
	Interview on 7/7/21 staff #2 stated:			
	-Been working here since May 2021 but be	en		
	employed in and out for five years.			
	-Programming here had "gone down the dr	ain."		
	-Felt like the clients needed more incentive	s,		
	"they have nothing to work for."			
	The clients on the girls hall had not gotten			
	individual therapy like they were supposed	to.		
	They barely had the group therapy that's			
	supposed to be daily. -Yesterday the Therapist brought them son			
	coloring and games to do, but no incentives	ie s to		
	work for.	510		
	Client #1 told her that it had been a month	since		
	she had individual therapy.	Sillog		
	The clients complained about the Therapis	t and		
1	now they had not meet with her.			1

PRINTED: 07/26/2021 FORM APPROVED Division of Health Service Regulation STATEMENT OF DEFICIENCIES (X1) PROVIDER/SUPPLIER/CLIA (X2) MULTIPLE CONSTRUCTION (X3) DATE SURVEY AND PLAN OF CORRECTION IDENTIFICATION NUMBER: COMPLETED A. BUILDING: _ 20140058 B. WING 07/07/2021 NAME OF PROVIDER OR SUPPLIER STREET ADDRESS, CITY, STATE, ZIP CODE 3200 WATERFIELD DRIVE STRATEGIC BEHAVIORAL CENTER-GARNER GARNER, NC 27529 SUMMARY STATEMENT OF DEFICIENCIES (X4) ID PROVIDER'S PLAN OF CORRECTION (X5) **PREFIX** (EACH DEFICIENCY MUST BE PRECEDED BY FULL PREFIX (EACH CORRECTIVE ACTION SHOULD BE COMPLETE REGULATORY OR LSC IDENTIFYING INFORMATION) TAG CROSS-REFERENCED TO THE APPROPRIATE TAG DATE DEFICIENCY) V 314 Continued From page 5 V 314 -The Clinical Director left two weeks ago and a new one came today to do a group with the clients. Interview on 6/07/21 staff #3 stated: - Group sessions were scheduled for one hour per day. - Group sessions were not happening daily and when they did have them, they had not lasted for one hour. - The clients are supposed to have one individual therapy session every week, and a family session every two weeks. - Girl clients had complaint about therapist not being available. - The Therapist had the 300-400 hall which consisted of twelve clients. Interview on 6/07/21 staff # 4 stated: - Clients had not met with the Therapist as often as they had met with therapist years ago. - The Therapist may not be available or too busy to meet with clients. - They had not had group sessions as much as the clients would like. - Daily schedule had group session starting at 11:00am. - The Therapist served twelve clients. Interview on 7/6/21 the Therapist stated: -Started work as the Therapist on 4/5/21. -Therapy group is daily at 11:00 am-12:00 pm Sunday through Thursday. -She is responsible for the girls hall consisting of currently 12 clients.

-Tried to conduct group therapy daily but varied if there were Client Family Treatment (CFT) meetings or if there is a behavior on the hall. -Had tried to do most CFT's on Sundays due to interfering with family/guardian's work schedules.

Division of Health Service Regulation

STATEMENT OF DEFICIENCIES (X1) P

STATEMENT OF DEFICIENCIES (X1) PROVIDER/SUPPLIER/CLIA		(X2) MULTIPLE	(X2) MULTIPLE CONSTRUCTION			
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V 314	Continued From page	6	V 314			
	-Mulvidual therapy is t	to be done one time week. more than a week without				
	her at least "touching	hase" with them				
	-Would "touch base" v	with them if she could not do				
	a traditional session.	war them it site could not do				
		maybe 15-30 minutes of				
	going on the hall to se	e how they were doing.				
	-Her duties included co	ompleting a psycho social				
	evaluation when they	first arrive, case				
		r care coordinators and				
	parents, weekly individ	dual and daily group				
	sessions.					
	-Not able to get all these things done.					
		as smaller she could better				
	meet the client needs.	and disastings at the sta				
	issues that well trained	and directions when its staff could accommodate				
	and handle."	stali could accommodate				
	-Family sessions were	to be done bi- weekly.				
	-If there was a session	scheduled and had no				- 1
	parent response she w	ould call 3-4 times to				- 1
	reschedule.					1
	-Client #3 recently miss	sed her family session.				-
	-Had to push the session	on back by thirty minutes				1
	because she was runni	ing late.				
	-She sent client #3's family member an email to let her know.					- 1
		om client #3's family				
	 -Had not heard back from client #3's family member at the point to reschedule. -The original meeting was scheduled for 6/27/21. 					1
						- 1
	-Reached out to resche	dule by leaving her a				1
	voicemail and emailed I	her.				- 1
	-Client #3's aunt varied					
	-Client #2 had not had a	an individual session since				
	6/15/21.					
	-She had a family session	on on 6/17/21.				
		client #2 scheduled for a				
	session.					
	-Documented individual behind on her notes.	sessions, but had been				
						- 1

Division of Health Service Regulation

	AND PLAN OF CORRECTION (X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER: (X2) MULTIPLE CONSTR A. BUILDING: 20140058 B. WING				(X3) DATE S	
				07/	07/2021	
	(EACH DEFICIENCY REGULATORY OR L	R-GARNER GARNE ATEMENT OF DEFICIENCIES MUST BE PRECEDED BY FULL SC IDENTIFYING INFORMATION)	ADDRESS, CITY, S ATERFIELD DR R, NC 27529 ID PREFIX TAG		DN DBE RIATE	(X5) COMPLETE DATE
	-Client #1's individual -6/29/21 was suppose but did not hear from individual therapyHad not rescheduled point for client #1Had poor communica Director who left two v -"I run into struggles w everything." Interview on 7/07/21 th (CEO) stated: -Daily therapy groups: daily basisThe Clinical Director is -She had items on her she did not completeIndividual and family th happen weeklyHad audited charts an individual and group th -Family and individual th week, and group theral -Therapist had a case I -They were looking at w Therapist and was away of those areas.	session was on 6/29/21. Ed to be her family session, them, so she just did an a family session at this tion with the Clinical weeks ago. With having time to do the Chief Executive Officer should be conducted on a seno longer with them. In plan of improvement that the herapy was expected to the disaw the notes where the erapies were being done. The herapy was one time a copy was daily. The oad of twelve clients. Ways to help support the re that paperwork was one	V 314	 a) The procedure for preventing the degand implementing the acceptable placorrection for the specific deficiency identified. 1) Nursing staff will be provided to on Clinical Policy 1000.7 Search Contraband by 8/21/2021. Any has not completed the policy reby this date will be remove from schedule. 2) All contraband checks that occur documented in a search documented in a search documented in a search documented in a start date and an end date specific to the period for which contraband continues to be foun warranted by self-harming behar relate to the contraband. 4) Contraband searches will be init through the direction of the Physician/Provider. c) The monitoring procedure to ensure plan of correction is effective, and specific deficiency cited remains and/or in compliance with the requirements. 1) Physician/Provider order directing search will be time limited with a 	reeducation of staff that education in the arr will be entation limited and viors that siated that the corrected regulatory is the	B) 8/21/2021
	27D .0103 Client Rights Policy 10A NCAC 27D .0103 SEIZURE POLICY (a) Each client shall be invasion of privacy. (b) The governing body implement policy that spunder which searches of the policy which was also searches of the policy which was also searches of the policy which searches of the policy which was also searches of the policy was also searches of the policy was also searches of the policy was	SEARCH AND free from unwarranted v shall develop and decifies the conditions	V 503	and an end date for searches. 2) Search documentation form will b medical record and forwarded to the manager. 3) Search documentation forms monitored, and number of performed will be reported out in 0	he Risk will be searches	

Division of Health Service Regulation STATEMENT OF DEFICIENCIES (X1) PROVIDER/SUPPLIER/CLIA (X2) MULTIPLE CONSTRUCTION (X3) DATE SURVEY AND PLAN OF CORRECTION IDENTIFICATION NUMBER: COMPLETED A. BUILDING: B. WING 20140058 07/07/2021 NAME OF PROVIDER OR SUPPLIER STREET ADDRESS, CITY, STATE, ZIP CODE 3200 WATERFIELD DRIVE STRATEGIC BEHAVIORAL CENTER-GARNER GARNER, NC 27529 SUMMARY STATEMENT OF DEFICIENCIES PROVIDER'S PLAN OF CORRECTION (X5) (EACH DEFICIENCY MUST BE PRECEDED BY FULL **PREFIX** PREFIX (EACH CORRECTIVE ACTION SHOULD BE COMPLETE REGULATORY OR LSC IDENTIFYING INFORMATION) TAG CROSS-REFERENCED TO THE APPROPRIATE TAG DATE DEFICIENCY) V 503 The Director of Quality, Compliance/RM Continued From page 8 V 503 (DQCR) or designee will report out the area may occur, and if permitted, the procedures results of the audits. A summary of the for seizure of the client's belongings, or property findings is being forwarded to the Quality/PI Council, Medical Executive in the possession of the client. (c) Every search or seizure shall be documented. Committee and Governing Board at each of their respective meetings. Documentation shall include: (1) scope of search: (2)reason for search; (3)procedures followed in the search; d) The title of the person responsible for (4) a description of any property seized; implementing the acceptable plan of correction. and CNO, and DQCR. (5)an account of the disposition of seized (V 503 ends here). property. This Rule is not met as evidenced by: Based on record review and interview the facility failed to ensure six of six audited clients (#1, #2, #3, #4, #5, #6) were subjected to unwarranted invasion of privacy. The findings are: Review on 6/22/21 of the facility's policy on "Room Searches" revealed: -"Policy- Searches of the rooms and personal belonging are conducted only to the extent required in order to ensure safety of all patients and/or to locate dangerous contraband. -Purpose- To ensure a safe environment for all patients admitted to the hospital. -Procedure- When there is a reasonable concern dangerous contraband is present, the following steps should occur: -Notify the unit nurse, the Executive Director and /or the Administrator on call (AOC). -Organize a patient meeting with all patients in attendance. -Explain what is missing (i.e., dangerous chemical from housekeeping cart) or what item is suspected of being hidden (metal window pieces, hardware removed and missing, etc.)

-Enlist the patients' participation in turning in

PRINTED: 07/26/2021 **FORM APPROVED** Division of Health Service Regulation STATEMENT OF DEFICIENCIES (X1) PROVIDER/SUPPLIER/CLIA (X2) MULTIPLE CONSTRUCTION (X3) DATE SURVEY AND PLAN OF CORRECTION **IDENTIFICATION NUMBER:** A. BUILDING: _ COMPLETED B. WING 20140058 07/07/2021 NAME OF PROVIDER OR SUPPLIER STREET ADDRESS, CITY, STATE, ZIP CODE 3200 WATERFIELD DRIVE STRATEGIC BEHAVIORAL CENTER-GARNER GARNER, NC 27529 SUMMARY STATEMENT OF DEFICIENCIES (X4) ID PROVIDER'S PLAN OF CORRECTION (X5)(EACH DEFICIENCY MUST BE PRECEDED BY FULL **PREFIX** PREFIX (EACH CORRECTIVE ACTION SHOULD BE COMPLETE REGULATORY OR LSC IDENTIFYING INFORMATION) TAG TAG CROSS-REFERENCED TO THE APPROPRIATE DATE DEFICIENCY) V 503 Continued From page 9 V 503 the article. -If this fails to resolve the issue: -Determine whether to call a unit wide search or whether to limit the search to rooms of concern. -Inform the charge nurse and ask two (2) staff be assigned to conduct the search. Staff members must stay together. -Ensure if safety permits, each patient is present when his or her room or belongings are searched. -Attempt to get his/her permission. -Search only to the extent required, i.e., if searching for an aerosol can, it would not be appropriate to search a patient's wallet. -Documentation- All facts constituting 'good cause' to search. -The scope of the search and the manner in which it was conducted (who conducted search, witnesses present, what was searched, items seized, etc.) -Actions taken as a result of the search (i.e. Patient placed on appropriate precautions, patient placed on 1:1, contracting with patient.)" Review on 6/22/21 of the "Environmental Round, Room Search, and Contraband Competency" training sheet for new employees revealed: -"Staff are able to demonstrate a check of patient belongings for contraband (checking seams, pockets or areas that would conceal potentially harmful items.)"

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-Age 15

-Admitted on 5/26/21

A. Below are examples where clients were searched by staff without following their policy.

Review on 6/21/21 of client #1's record revealed:

-Diagnoses of Major Depressive Disorder (MDD),

PRINTED: 07/26/2021 FORM APPROVED Division of Health Service Regulation STATEMENT OF DEFICIENCIES (X1) PROVIDER/SUPPLIER/CLIA (X2) MULTIPLE CONSTRUCTION (X3) DATE SURVEY AND PLAN OF CORRECTION IDENTIFICATION NUMBER: A. BUILDING: _ COMPLETED B. WING 20140058 07/07/2021 NAME OF PROVIDER OR SUPPLIER STREET ADDRESS, CITY, STATE, ZIP CODE 3200 WATERFIELD DRIVE STRATEGIC BEHAVIORAL CENTER-GARNER GARNER, NC 27529 (X4) ID SUMMARY STATEMENT OF DEFICIENCIES PROVIDER'S PLAN OF CORRECTION (X5) COMPLETE (EACH DEFICIENCY MUST BE PRECEDED BY FULL PREFIX PREFIX (EACH CORRECTIVE ACTION SHOULD BE REGULATORY OR LSC IDENTIFYING INFORMATION) TAG TAG CROSS-REFERENCED TO THE APPROPRIATE DATE DEFICIENCY) V 503 Continued From page 10 V 503 Attention Deficit Disorder (ADHD) and Oppositional Defiant Disorder (ODD) Interview on 6/23/21 Client #1 stated: -Staff searched their rooms daily. -They always search them when they are in school. -Could tell when staff went through her items because her clothes were moved or not folded the same way. Review on 7/07/21 of Client #3's record revealed: - Admitted: 4/15/21 - Age: 15 - Diagnoses: Disruptive mood Dysregulation disorder Interview on 7/07/21 client #3 stated: - Room had been searched daily. -The searches were done while they were in school. - She was searched when entering from the courtyard by staff. Review on 6/22/21 of client # 5's record revealed: - Admitted: 4/22/21 - Age: 14 - Diagnoses: Borderline personality disorder. Post-traumatic stress disorder, Generalized anxiety disorder Interview on 6/22/21 client #5 stated: - Room searches happened every day.

couch.

- Usually not in the room when it's searched. - All belongings left on the bed and told to put away belongings when she returned to her room. - Sometimes when the day room is searched everything is pulled out even the cushions on the

-The staff tell "us" to clean up the day room.

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		20140058	B. WING			07/07/2021	
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(X4) ID	SUMMARY STA	ATEMENT OF DEFICIENCIES	ID	PROVIDER'S PLAN OF (CORRECTION		
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V 503	Continued From page	11	V 503				
		earched each time when					
	they were coming in fr	om the courtyard.					
	Pavious on 6/04/04 of	Olis at #41					
	-Admitted on 4/19/21.	Client #4's record revealed:					
	-Diagnosis: Disruptive						
	disorder.	moda Dyorogalation					
	1.2						
	Interview on 6/24/21 Client #4 stated: -Staff searched their room everyday.						
	 -Not aware if they had found anything during the daily searches. 						
	-No contraband was fo	und in her room.					
	Interview on 6/22/21 ar	nd 7/7/21 the Program					
	Coordinator stated:						
	each shift.	ompleted twice a day on					
	-The rooms were search	thed as part of the					
	Environment of Care (E						
	completed on each shirt	ft.					
	-Staff were to check all	areas of the room for					
	safety.						
		t "unwarranted" because					
	their room and items.	the client themselves, just					
		through the clients' items					
	to ensure there was no	contraband.					
	-Created the Environme	ent of Care (EOC) training					
	curriculum for staff with	approval from					
	management.						
	on the EOC checklist.	found, it was documented					
		ent informed him she had					
	used a small piece of a	Digital Video Disc (DVD)					
	to cut herself.	5 1.000 5.00 (5 15)					
	-The client told him whe	re she hid it in her room.					
	 At that point it was mar 	nagement's decision to					
	search all twelve clients	rooms on the 300-400					
	hall.						

Division of Health Service Regulation

A. BUILDING: COMPLETED 20140058 B. WING 07/07/2021 NAME OF PROVIDER OR SUPPLIER STRATEGIC BEHAVIORAL CENTER-GARNER 3200 WATERFIELD DRIVE GARNER, NC 27529 (X4) ID SUMMARY STATEMENT OF DEFICIENCIES ID PROVIDER'S PLAN OF CORRECTION (X5) PREFIX (EACH DEFICIENCY MUST BE PRECEDED BY SUIL IN THE PRECEDED BY SUIL IN	STATEMENT OF DEFICIENCIES (X1) PROVIDER/SUPPLIER/CLIA AND PLAN OF CORRECTION IDENTIFICATION NUMBER:		(X2) MULTIPLE C	(X3) DATE SURVEY			
NAME OF PROVIDER OR SUPPLIER STRATEGIC BEHAVIORAL CENTER-GARNER (X4) ID PREFIX TAG SUMMARY STATEMENT OF DEFICIENCY MUST BE PRECEDED BY PULL REGULATORY OR LISC IDENTIFYING INFORMATION) V 503 Continued From page 12 -No other items were found in the clients' roomsClients on that hall had been caught a few weeks ago bringing in rocks from the courtyard to cut themselvesStaff was instructed by management to start searching the clients every time they came in from the courtyardStaff had been checking the shoes, socks and clothesThe clients go on the courtyard a minimum of one time a dayThese searches of the clients had not found any items as far as he knewThese searches are not documented. Review on 6/22/12 of the "EOC Shift Walk through Checklist" for the month of June 2021 in the 300-400 and 700-800 halls revealed: -Searches completed twice a dayFood was found in client rooms on 6/10/21Shower curtain issues on 6/19/21 and 6/20/21Screws in bathroom on 6/10/21She worked on hall 400 as a mental health technician (MHT)She was trained to search rooms daily.	BENTI OATION TOWNER.		A. BUILDING:	A. BUILDING:			
STRATEGIC BEHAVIORAL CENTER-GARNER 3200 WATERFIELD DRIVE GARNER, NC 27529 Continued From page 12 Continued From page 12 Continued From page 12 Continued From page 13 Continued From page 14 Continued From page 15 Continued From page 15 Continued From page 16 Continued From page 17 Continued From page 18 Continued From page 19 Continued From pag			20140058	B. WING		0.	7/07/2021
XA ID SUMMARY STATEMENT O DEFICIENCIES D PROVIDER'S PLAN OF CORRECTION SUMMARY STATEMENT OF DEFICIENCES PREFIX REGULATORY OR LSC IDENTIFYING INFORMATION) D PROVIDER'S PLAN OF CORRECTION SHOULD BE CROSS-REFERENCED TO THE APPROPRIATE DEFICIENCY DEFICIENCY V 503	NAME	OF PROVIDER OR SUPPLIER	STREET AI	DDRESS, CITY, STATE	; ZIP CODE		
CXA, ID PREFIX SUMMARY STATEMENT OF DEPICIENCIES PREFIX REGULATORY OR LSC IDENTIFYMO INFORMATION) PREFIX TAG PREFIX TAG PREFIX TAG PREFIX TAG PREFIX TAG PREFIX TAG PROVIDER'S PLAN OF CORRECTION (EACH CORRECTIVE ACTION SHOULD BE CROSS-REFERENCE) TO THE APPROPRIATE DATE	STRA	TEGIC BEHAVIORAL CENTE	R-GARNER 3200 WA	TERFIELD DRIVE			
PREFIX TAG (EACH DEFICIENCY MUST BE PRECEDED BY FULL REGULATORY OR LSC IDENTIFYING INFORMATION) V 503 Continued From page 12 -No other items were found in the clients' roomsClients on that hall had been caught a few weeks ago bringing in rocks from the courtyard to cut themselvesStaff was instructed by management to start searching the clients every time they came in from the courtyardStaff had been checking the shoes, socks and clothesThe clients go on the courtyard a minimum of one time a dayThese searches of the clients had not found any items as far as he knewThese searches are not documented. Review on 6/22/21 of the "EOC Shift Walk through Checklist" for the month of June 2021 in the 300-400 and 700-800 halls revealed: -Searches completed twice a dayFood was found in client rooms on 6/11/21, 6/16/21 & 6/18/21Shower curtain issues on 6/19/21 and 6/20/21Screws in bathroom on 6/10/21"Sharp red plastic" on 6/20/21. Interview on 6/17/21 Staff #5 stated: -She worked on hall 400 as a mental health technician (MHT)She was trained to search rooms daily.		2/11/11/20		₹, NC 27529			
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are checked, the client's cubby and their clothesUsually rooms checks were two times a day and documentedHaven't found any contraband during any search completed. Interview on 7/06/21 Staff # 4 stated: - Searches were completed everyday Tried to complete searches when the clients	V	-No other items were -Clients on that hall ha ago bringing in rocks themselvesStaff was instructed the searching the clients of from the courtyardStaff had been check clothesThe clients go on the one time a dayThese searches of the items as far as he knee -These searches are in Review on 6/22/21 of through Checklist" for the 300-400 and 700-8 -Searches completed the -Food was found in clie 6/16/21 & 6/18/21Shower curtain issues -Screws in bathroom o -"Sharp red plastic" on Interview on 6/17/21 St -She worked on hall 40 technician (MHT)She was trained to sea -Beds were checked, the are checked, the client' -Usually rooms checks documentedHaven't found any con completed. Interview on 7/06/21 St - Searches were completed.	found in the clients' rooms. ad been caught a few weeks from the courtyard to cut by management to start every time they came in ling the shoes, socks and courtyard a minimum of e clients had not found any w. not documented. the "EOC Shift Walk the month of June 2021 in 300 halls revealed: twice a day. ent rooms on 6/11/21, s on 6/19/21 and 6/20/21. n 6/10/21. 6/20/21. taff #5 stated: 10 as a mental health arch rooms daily. he creases of the mattress is cubby and their clothes. were two times a day and traband during any search aff # 4 stated: eted everyday.	V 503			

Division of Health Service Regulation
STATEMENT OF DEFICIENCIES (X1) PR

	STATEMENT OF DEFICIENCIES (X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:		(X2) MULTIPLE CONSTRUCTION A. BUILDING:			(X3) DATE SURVEY COMPLETED	
		20140058	B. WING		0	7/07/2021	
NAME OF F	PROVIDER OR SUPPLIER			TATE, ZIP CODE			
STRATE	GIC BEHAVIORAL CENTE	R-GARNER	FERFIELD DR , NC 27529	IVE			
(X4) ID	SLIMMARY ST	ATEMENT OF DEFICIENCIES		550//550			
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V 503	Continued From page	13	V 503				
	- Never found any rocks or other contraband when a search was completed Searches of the clients' clothes and shoes were done when the clients came in from the courtyard. Interview on 7/06/21 Staff #3 stated: - All the girl rooms were searched daily Had not found contraband during any searches When searches completed they were documented on the environmental checklist shift check All girls were searched before coming in from the courtyard. Interview on 7/6/21 Staff #1 stated: - Did room searches on each shift Had not found anything during searches They completed the searches when the girls were not on the hall Sometimes one staff did them, sometimes two, "yesterday I was by myself." - When clients came in from outside they had to take their shoes and socks off and shake them, empty their pockets and open their mouths "We do these searches every time, we check them regardless." - They were told to do these searches on everyone because "it would be fair." - Was told the female clients had a history of taking rocks from the courtyard and hiding them Not found any since she started two months ago. Interview on 7/6/21 Staff #2 stated: - Moved to the 300-400 hall on 6/25/21 Searched rooms daily on each shift.						
	-When clients came in f	r shoes and socks, shake					

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PRINTED: 07/26/2021 **FORM APPROVED** Division of Health Service Regulation STATEMENT OF DEFICIENCIES (X1) PROVIDER/SUPPLIER/CLIA (X2) MULTIPLE CONSTRUCTION (X3) DATE SURVEY AND PLAN OF CORRECTION **IDENTIFICATION NUMBER:** COMPLETED A. BUILDING: B. WING 20140058 07/07/2021 NAME OF PROVIDER OR SUPPLIER STREET ADDRESS, CITY, STATE, ZIP CODE 3200 WATERFIELD DRIVE STRATEGIC BEHAVIORAL CENTER-GARNER GARNER, NC 27529 SUMMARY STATEMENT OF DEFICIENCIES (X4) ID PROVIDER'S PLAN OF CORRECTION (X5) COMPLETE (EACH DEFICIENCY MUST BE PRECEDED BY FULL **PREFIX PREFIX** (EACH CORRECTIVE ACTION SHOULD BE REGULATORY OR LSC IDENTIFYING INFORMATION) TAG CROSS-REFERENCED TO THE APPROPRIATE TAG DATE DEFICIENCY) V 503 Continued From page 14 V 503 under their bra, shake their shirt and check the waistband of their pants. -Had not found anything during these searches. -Not aware of anything being found from other -Had no issues with the clients cutting or having contraband. B. Below is an example of where clients' items were seized and there was no account of the description of any property seized and and no account of the disposition of seized property. Review on 6/21/21 of "Incident Log" revealed: -June 9, 2021-Four clients (#1, #7, #8 and #9) were identified as having used different items to cut themselves. Review on 6/21/21 of Client #1's "Physician Order Sheet" revealed: 6/9/21- "Remove all personal belongings from patient room and reassess daily for safety" Review on 6/21/21 of Client #4's "Physician Order Sheet" revealed: 6/9/21- "Remove all personal belongings from patient room and reassess daily for safety" Review on 7/7/21 of Client #2's "Physician Order Sheet" revealed: 6/9/21- "Remove all personal belongings from patient room and reassess daily for safety"

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items back.

Interview on 6/23/21 Client #1 stated:

-They did not have their clothes.

-About a week ago, staff took all their items away. -A week or so went by before they got all their

-Only got a stuffed animal and books at first.

-Their items were placed in the "bin room" and

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Interview on 6/22/21 Client #3 stated:

she was out of the room.

- Staff had taken all personal belongings, while

- Had gotten belongings back but was missing some items, a journal, a book and some personal

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away.

be returned.

informed her.

take their personal items.

and threw water on the floors.

and the Clinical Director (CD).

Interview on 7/06/21 Staff #4 stated:

the clients' belongings were taken.

back for good behavior.

- Some of the girls had their items returned to

- Had not worked when the "riot" happened but heard the clients threw their mattresses in the hallway, wet tissue balls at staff, wall and ceiling

-Was told the decision to remove the girls' items was made by the Chief Executive Officer (CEO)

- Had not worked at the time of the incident when

- Wasn't aware of why the belongings were taken

Was told that clients' were to receive belongings

- Was not aware of when the belongings were to

- Was not working when the "riot" happened on the 300 hall but was aware because clients

- Not all the girls' items were returned.

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to help keep them calm.

-They now have their clothes, not sure when they

-Did not get a directive to give anything back, no one seemed to know when they would get their

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her room.

Interview on 7/7/21 the Program Director stated: -Client #7 reported to him she had a piece of DVD to self harm which prompted them to search

-Client #7 showed him where she had hid the piece in her room between the crack of her desk. -The Dr. #1 then ordered staff to search all 12

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STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION (X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER: 20140058				(X2) MULTIPLE CONSTRUCTION A. BUILDING:		(X3) DATE SURVEY COMPLETED	
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NAME OF P	ROVIDER OR SUPPLIER	STREET AG	DDRESS, CITY, ST			70772021	
STRATEG	GIC BEHAVIORAL CENTE	R-GARNER	R, NC 27529	VE.			
(X4) ID PREFIX TAG	(EACH DEFICIENC)	ATEMENT OF DEFICIENCIES Y MUST BE PRECEDED BY FULL SC IDENTIFYING INFORMATION)	ID PREFIX TAG	PROVIDER'S PLAN ((EACH CORRECTIVE AI CROSS-REFERENCED TO DEFICIEI	CTION SHOULD BE O THE APPROPRIATE	(X5) COMPLETE DATE	
	rooms -Administration (Chief CD and the CEO) dee from their roomsHe went down with the clients of the decision their safetyOnly things left in the pillow, towels and was -Was not given a time items were to be remorable. The clients were very some rapport" with the -The clients were very some rapport with the -They asked the client behaviorsThere was no expect administration as to we returned if they exhibit -The clients were "quit "damage control." -The clients became very then proceeded mattresses in the hallow and threw pop cornThese behaviors lasteralso it was decided the separated from twelve hallsThe news of separatin upsetAdministration (CEO at the end of things to ordered with separatin -The CEO spoke to the and said the decision was recommended.	Ing else in any of the client If Nursing Officer -CNO, the cided to remove all items The Clinical Director to inform sion to remove all items the decision was made for a sir room was their sheets, she cloths. If rame for how long their loved. If upset and this "fractured ecclients. It to continue to have safe ations given by then their items would be led good behaviors. It is it is it is in a made them and CNO) came on the hall make sure they did as ginto the two halls. If a clients in a group setting	V 503				

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PRINTED: 07/26/2021 FORM APPROVED Division of Health Service Regulation STATEMENT OF DEFICIENCIES (X1) PROVIDER/SUPPLIER/CLIA (X2) MULTIPLE CONSTRUCTION (X3) DATE SURVEY AND PLAN OF CORRECTION IDENTIFICATION NUMBER: COMPLETED A. BUILDING: 20140058 B. WING 07/07/2021 NAME OF PROVIDER OR SUPPLIER STREET ADDRESS, CITY, STATE, ZIP CODE 3200 WATERFIELD DRIVE STRATEGIC BEHAVIORAL CENTER-GARNER GARNER, NC 27529 SUMMARY STATEMENT OF DEFICIENCIES (X4) ID PROVIDER'S PLAN OF CORRECTION (EACH DEFICIENCY MUST BE PRECEDED BY FULL **PREFIX** PREFIX (EACH CORRECTIVE ACTION SHOULD BE COMPLETE TAG REGULATORY OR LSC IDENTIFYING INFORMATION) CROSS-REFERENCED TO THE APPROPRIATE TAG DATE DEFICIENCY) V 503 Continued From page 20 V 503 -After a few days, certain clients were given some of their items, not sure how that was determined. -Not sure how long it was before all items were returned. -Items were placed in the bin room. -Items were placed in bags based on the client room numbers. -They have instances of the clients saying they were missing some of their items. -Less than maybe five items not located -Administration is aware of certain items missing. -Client #1 had clothing items missing and had not been located. Interview on 6/23/21 Doctor #1 stated: -A few weeks ago, he wrote an order to remove all personal items from the girls' rooms. -The girls had a rough month being caught with rocks and cutting. -Made the decision to take all personal items due to safety. -They were just trying to get a "hold of the whole unit." -Not aware of all clients cutting, but there were a lot doing it. -Felt like it was a competition to see who could harm themselves the most. -The unit was run by the nurses and they could "institute whatever to keep the unit safe." Interview on 7/7/21 the CNO stated: -After the clients had been cutting and items were found, the CEO spoke with the CD about moving them and removing their belongings. -Agreed with their decision.

sure how many.

made to take all items.

-Was aware it was not all twelve cutting, but not

-After search and nothing found, decision was

-She and the CEO went back on the unit to

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Interview on 7/7/21 the CEO stated:

during that time.

-A few weeks ago, Dr. #2 came down to let her know that the girls were under duress and were getting very loud.

-Had heard the items were mixed up in the bin room, had not heard of anything missing.

- -Walked on the unit with Dr. #2 and the CD because they wanted to separate the girls because of the behaviors.
- -They were "loud and rambunctious."
- -They made the plan of who they were going to separate and placed them on two separate halls.
- -The treatment team had made decision and were in agreement to remove all the girls' items to get a hold of what was going on.
- -The treatment team consisted of, the Doctors, the Therapist, the CNO, the Program Director and the CD.
- -They took everything out of the rooms including books, stuffed animals and all clothes other than what they were wearing.
- -After items were removed the CD along with the team members were to reassess on a daily basis.
- -This should have been documented in their treatment plan.
- -They were to be given back two items a day until they received all of their items.
- -After the clients lost their items and were told they would be separated they did become disruptive.

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happens.

those items.

client #7's desk.

what was in their rooms.

that relate to the contraband.

-Some things on her list were not on her initial inventory list at the time of admission. -Not heard of journals or work folders missing. -The item found was a piece of DVD located in

 -Also found a staple in a clients' book. -"We couldn't be certain in any shape or form"

-Looking back we should have searched everything and not taken the items.

Review on 7/7/21 of "Plan of Protection" dated 7/7/21 completed by the CEO revealed: -"What immediate action will the facility take to ensure the safety of the consumer in your care? 1. All contraband checks that occur will be documented in a search documentation form. 2. Contraband checks will be time limited with a start date and an end date and specific to the period for which contraband continues to be found and warranted by self harming behaviors

3. Contraband searches will be initiated through

-Describe your plans to make sure the above

the direction of the Physician/Provider.

Division of Health Service Regulation

AND PLAN OF CORRECTION (X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:		A. BUILDING:	ONSTRUCTION	(X3) DATE SURVEY COMPLETED		
20140058			B. WING	B. WING		
	PROVIDER OR SUPPLIER GIC BEHAVIORAL CENTE	R-GARNER 3200 WA	DDRESS, CITY, STATE, TERFIELD DRIVE 1, NC 27529	ZIP CODE		
(X4) ID PREFIX TAG	(EACH DEFICIENCY	ATEMENT OF DEFICIENCIES MUST BE PRECEDED BY FULL SC IDENTIFYING INFORMATION)	ID PREFIX TAG	PROVIDER'S PLAN OF CORRECTION (EACH CORRECTIVE ACTION SHOULD I CROSS-REFERENCED TO THE APPROPRI DEFICIENCY)	BE COMPLETE	
V 503	Continued From page	23	V 503			
	will be the time limited end date for searches 2. Search documental record and forwarded	tion form will be in medical to Risk Manager. ion forms will be monitored, es performed will be				
	Diruptive Mood Dysressubjected to a twice a of staff going through a leaving their items out. There was no evidence searches and staff had these on their shifts. The trained employees to a which did not follow the so. Twelve clients on the rooms searched due to had a piece of DVD and #7 directed staff to the DVD and it was recover rooms were searched the Dr. #1, the CNO and remove all their items of twere only provided with and hygiene items in postated the clients were as they were assessed interviews with staff and happened. No staff also Director and Therapist how clients were to recitems were removed from the provided in behaviors to with them throwing their staff and the provided in the provided with them throwing their subjects to the provided in the provided with them throwing their subjects and the provided with the p	that lead to these daily depend trained to complete the Program Director conduct these searches to facility's policy in doing the 300-400 hall had their to client #7 admitting she ad had self harmed. Client location she had hid the tered. As a result all clients' and the CEO along with ad the CD instructed staff to from the room. Clients the adaily change of clothes aper cups. The CEO to get two items back daily in During multiple declients, this had not any with the Program were aware of when and the eive their items. After the form the clients' rooms, they that lasted for three hours in mattresses, soap and all. The clients went for				

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PRINTED: 07/26/2021 FORM APPROVED Division of Health Service Regulation STATEMENT OF DEFICIENCIES (X1) PROVIDER/SUPPLIER/CLIA (X2) MULTIPLE CONSTRUCTION (X3) DATE SURVEY AND PLAN OF CORRECTION IDENTIFICATION NUMBER: COMPLETED A. BUILDING: _ B. WING 20140058 07/07/2021 NAME OF PROVIDER OR SUPPLIER STREET ADDRESS, CITY, STATE, ZIP CODE 3200 WATERFIELD DRIVE STRATEGIC BEHAVIORAL CENTER-GARNER GARNER, NC 27529 SUMMARY STATEMENT OF DEFICIENCIES (X4) ID PROVIDER'S PLAN OF CORRECTION (EACH DEFICIENCY MUST BE PRECEDED BY FULL **PREFIX** PREFIX (EACH CORRECTIVE ACTION SHOULD BE COMPLETE REGULATORY OR LSC IDENTIFYING INFORMATION) TAG CROSS-REFERENCED TO THE APPROPRIATE TAG DATE DEFICIENCY) V 503 Continued From page 24 V 503 items back and some clients had items missing that could not be located. The facility's failure to follow their own policy of search and seizure resulted in daily unwarranted searches and all twelve clients' personal items being removed causing aggressive behaviors was detrimental to their health, safety and welfare. This deficiency constitutes a Type B rule violation. If the violation is not corrected within 45 days, an administrative penalty of \$200.00 per day will be imposed for each day the facility is out of compliance beyond the 45 th day.

Division of Health Service Regulation

STATE FORM



DHSR - Mental Health

AUG 6 2021

August 6, 2021

Lic. & Cert. Section

NCDHHS/DHSR Kimberly Thigpen & Keisha Douglas Facility Compliance Consultant I 1800 Umstead Drive Williams Building Raleigh, NC 27603

RE: Annual, Follow up and Complaint Survey Intake #s: 00178774, 00178699, 00178447, 00177440, 00164658.

Dear Ms. Thigpen & Ms. Douglas:

Please see the enclosed Standard Level Plan of Correction and the Type B for the survey that was completed on 7/7/2021. Please don't hesitate to reach out if you have any additional questions.

Respectfully,

Evelyn Alsup, CEO

Evelyn all Sup Jeneka Parker
Enc: Plan of Correction

qsj