

Division of Health Service Regulation

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION	(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:  <b>MHL047-158</b>	(X2) MULTIPLE CONSTRUCTION A. BUILDING: _____  B. WING _____	(X3) DATE SURVEY COMPLETED  <b>06/16/2022</b>
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NAME OF PROVIDER OR SUPPLIER  <b>CANYON HILLS TREATMENT FACILITY</b>	STREET ADDRESS, CITY, STATE, ZIP CODE <b>769 ABERDEEN ROAD RAEFORD, NC 28376</b>
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(X4) ID PREFIX TAG	SUMMARY STATEMENT OF DEFICIENCIES (EACH DEFICIENCY MUST BE PRECEDED BY FULL REGULATORY OR LSC IDENTIFYING INFORMATION)	ID PREFIX TAG	PROVIDER'S PLAN OF CORRECTION (EACH CORRECTIVE ACTION SHOULD BE CROSS-REFERENCED TO THE APPROPRIATE DEFICIENCY)	(X5) COMPLETE DATE
V 000	<p><b>INITIAL COMMENTS</b></p> <p>A complaint and a limited follow-up survey for the Type A1 was completed on June 16, 2022. This was a limited follow-up survey, only 10A NCAC 27G .1901 Psychiatric Residential Treatment Facility - Scope (V314) was reviewed for compliance. The following was brought back into compliance: 10A NCAC 27G .1901 Psychiatric Residential Treatment Facility - Scope (V314). Complaints #NC00189307, #NC00189348, #NC00189586 and #NC00189652 were substantiated. Complaint #NC00189014 was unsubstantiated. Deficiencies were cited.</p> <p>This facility is licensed for the following service category: 10A NCAC 27G .1900 PRTF- Psychiatric Residential Treatment Facility for Children and Adolescents.</p> <p>This facility is licensed for 24 and currently has a census of 19. The survey sample consisted of audits of 4 current clients and 1 former client.</p>	V 000		
V 314	<p>27G .1901 Psych Res. Tx. Facility - Scope</p> <p>10A NCAC 27G .1901 SCOPE</p> <p>(a) The rules in this Section apply to psychiatric residential treatment facilities (PRTF)s.</p> <p>(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.</p> <p>(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.</p> <p>(d) Therapeutic interventions shall address functional deficits associated with the child or adolescent's diagnosis and include psychiatric</p>	V 314		

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LABORATORY DIRECTOR'S OR PROVIDER/SUPPLIER REPRESENTATIVE'S SIGNATURE \_\_\_\_\_ TITLE \_\_\_\_\_ (X6) DATE \_\_\_\_\_

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V 314	<p>Continued From page 1</p> <p>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.</p> <p>(e) The PRTF shall serve children or adolescents for whom removal from home or a community-based residential setting is essential to facilitate treatment.</p> <p>(f) The PRTF shall coordinate with other individuals and agencies within the child or adolescent's catchment area.</p> <p>(g) The PRTF shall be accredited through one of the following; Joint Commission on Accreditation of Healthcare Organizations; the Commission on Accreditation of Rehabilitation Facilities; the Council on Accreditation or other national accrediting bodies as set forth in the Division of Medical Assistance Clinical Policy Number 8D-1, Psychiatric Residential Treatment Facility, including subsequent amendments and editions. A copy of Clinical Policy Number 8D-1 is available at no cost from the Division of Medical Assistance website at <a href="http://www.dhhs.state.nc.us/dma/">http://www.dhhs.state.nc.us/dma/</a>.</p> <p>This Rule is not met as evidenced by: Based on record review and interviews the facility failed to ensure (a) clients received mental health therapeutic care designed to address the treatment needs necessary to facilitate a move to a less intensive community setting for 1 of 5 audited clients (#1) and (b) failed to coordinate with other individuals and agencies for 2 of 5</p>	V 314		

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V 314	<p>Continued From page 2</p> <p>audited clients (#1 and #2). The findings are:</p> <p>A. Review on 6/14/22 of Client #1's record revealed:</p> <ul style="list-style-type: none"> <li>-Age: 12</li> <li>-Admission date of 2/19/21.</li> <li>-Diagnoses of Attention-Deficit Hyperactivity Disorder, Combined Type and Oppositional Defiant Disorder.</li> <li>-Treatment Plan dated 5/25/22 included the following goals: <ul style="list-style-type: none"> <li>-"[Client #1] will eliminate all inappropriate sexual behaviors by actively engage in sex offender education and mental health therapy sessions while completing clinical assignments and activities which address healthy boundaries and socially appropriate behaviors through individual and group therapy activities as evidence by progress documented on clinical notes."</li> </ul> </li> </ul> <p>Review on 6/14/22 of Client #1's Therapy Notes revealed the following:</p> <ul style="list-style-type: none"> <li>-Individual therapy on 4/11/22, 5/7/22 and 5/14/22</li> <li>-Group therapy 3/8/22, 3/24/22 and 3/25/22.</li> <li>-There were no family sessions.</li> <li>-There were no sessions focused on inappropriate sexual behaviors.</li> </ul> <p>Interview on 6/14/22 with Client #1 revealed:</p> <ul style="list-style-type: none"> <li>-Last time he had therapy was either Sunday or Saturday.</li> <li>-The therapist did not work full-time.</li> <li>-Worked with the therapist for about 2-3 weeks.</li> <li>-Received therapy about his anger management and coping skills.</li> <li>-Sometimes he had group therapy with the therapist.</li> <li>-Previously received therapy at least one or twice a week.</li> </ul>	V 314		

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V 314	<p>Continued From page 3</p> <ul style="list-style-type: none"> <li>-He had family therapy a little while ago.</li> <li>-"I only had it once, but I want it."</li> <li>-He started receiving treatment for sexual behavior with current therapist.</li> <li>-Workbook provided to him by the previous Clinical Director.</li> <li>-He had to read and answer questions from the workbook.</li> <li>-He did not understand the lessons in the workbook.</li> <li>-Sometimes it is reviewed by the therapist, "whenever he gets time."</li> </ul> <p>Interview on 6/15/22 with the Therapist revealed:</p> <ul style="list-style-type: none"> <li>-He started about 2-3 weeks ago as the therapist.</li> <li>-He had no formal clinical training specializing in sexual behaviors.</li> <li>-The previous clinical director provided clients the workbook.</li> <li>-He printed pages from the workbook and reviewed with client.</li> <li>-He worked 2-3 days out of the week but mostly Saturday and Sunday.</li> <li>-He was not full-time.</li> <li>-For the past 2-3 months he focused on individual therapy.</li> <li>-There was no other therapist when he took the job.</li> <li>-He just start working on inappropriate sexual behaviors with client #1.</li> </ul> <p>Interview on 6/15/22 with the Clinical Director revealed:</p> <ul style="list-style-type: none"> <li>-She started as the clinical director on 4/29/22.</li> <li>-The therapist worked as the qualified professional before she got there and facilitated group therapy.</li> <li>-The first week of May 2022 the company let go two contract therapists.</li> <li>-The company did not inform her that they were</li> </ul>	V 314		

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V 314	<p>Continued From page 4</p> <p>letting go the therapists. -The therapist currently worked Saturday and Sunday. -She requested that the therapist worked full-time but was denied. -She also requested for a specialized therapist to management with no response.</p> <p>B. Review on 6/14/22 of Client #1's record revealed: -Age: 12 -Admission date of 2/19/21. -Diagnoses of Attention-Deficit Hyperactivity Disorder, Combined Type and Oppositional Defiant Disorder. -Treatment Plan dated 5/25/22 included the following goals: - "[Client #1] will learn and implement thought-stopping to manage intrusive unwanted thoughts that trigger anger and acting out ..." - "[Client #1] will identify and implement effective problem-solving strategies by reducing symptoms of anger and increasing coping skills that effectively reduce the frequency of his anger outbursts ..." - "[Client #1] will eliminate all inappropriate sexual behaviors by actively engage in sex offender education and mental health therapy sessions while completing clinical assignments and activities which address healthy boundaries and socially appropriate behaviors through individual and group therapy activities as evidence by progress documented on clinical notes." - Child/Family Team Meeting dated 5/25/22.</p> <p>Review on 6/14/22 of Client #1's Therapy Notes revealed following: - Individual therapy on 4/11/22, 5/7/22 and 5/14/22 - Group therapy 3/8/22, 3/24/22 and 3/25/22.</p>	V 314		

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V 314	<p>Continued From page 5</p> <ul style="list-style-type: none"> <li>-There were no family sessions.</li> <li>-There were no sessions focused on inappropriate sexual behaviors.</li> </ul> <p>Review on 6/14/22 of Client #1's record revealed:</p> <ul style="list-style-type: none"> <li>-Psychological evaluation request submitted 5/27/22.</li> <li>-There was no evidence in the record that evaluation was requested in previous CFT meeting minutes.</li> </ul> <p>Interview on 6/14/22 with Client #1 revealed:</p> <ul style="list-style-type: none"> <li>-Last time he had therapy was either Sunday or Saturday.</li> <li>-The therapist did not work full-time.</li> <li>-Worked with the therapist for about 2-3 weeks.</li> <li>-Received therapy about his anger management and coping skills.</li> <li>-Sometimes he had group therapy with the therapist.</li> <li>-Previously received therapy at least one or twice a week.</li> <li>-He had family therapy a little while ago.</li> <li>-"I only had it once, but I want it."</li> <li>-He started receiving treatment for sexual behavior with current therapist.</li> <li>-Workbook provided to him by the previous Clinical Director.</li> <li>-He had to read and answer questions from the workbook.</li> <li>-He did not understand the lessons in the workbook.</li> <li>-Sometimes it is reviewed by the therapist, "whenever he gets time."</li> <li>-He never received psychological evaluation.</li> </ul> <p>Interview on 6/15/22 with the Therapist revealed:</p> <ul style="list-style-type: none"> <li>-He started about 2-3 weeks ago as the therapist.</li> <li>-He had no formal clinical training specializing in sexual behaviors.</li> </ul>	V 314		

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V 314	<p>Continued From page 6</p> <ul style="list-style-type: none"> <li>-The previous clinical director provided clients the workbook.</li> <li>-He printed pages from the workbook and reviewed with client.</li> <li>-He worked 2-3 days out of the week but mostly Saturday and Sunday.</li> <li>-He was not full-time.</li> <li>-For the past 2-3 months he focused on individual therapy.</li> <li>-There was no other therapist when he took the job.</li> <li>-Had a good relationship with the clients.</li> <li>-He just start working on inappropriate sexual behaviors client #1.</li> </ul> <p>Interview on 6/14/22 with the Qualified Professional revealed:</p> <ul style="list-style-type: none"> <li>-She submitted referral for psychological testing on 5/27/22.</li> <li>-The location of the test was not covered under client #1's insurance.</li> <li>-The team was in the process for searching for another psychological testing.</li> </ul> <p>Interview on 6/15/22 with the Clinical Director revealed:</p> <ul style="list-style-type: none"> <li>-She started as the clinical director on 4/29/22.</li> <li>-The therapist worked as the qualified professional before she got there and facilitated group therapy.</li> <li>-The first week of May 2022 the company let go two contract therapists.</li> <li>-The company did not inform her that they were letting go the therapists.</li> <li>-She immediately had the QP become the individual therapist.</li> <li>-The Therapist currently worked Saturday and Sunday.</li> <li>-She requested that the therapist worked full-time but was denied.</li> </ul>	V 314		

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V 314	<p>Continued From page 7</p> <ul style="list-style-type: none"> <li>-The new QP started towards the middle to end of April 2022.</li> <li>-Previous QP was let go for no reason in April 2022.</li> <li>-Aware the psychological evaluation request was submitted.</li> <li>-Unaware the psychological location was denied due to his insurance.</li> <li>-She started participating in the CFT meetings due to prior issues and concerns.</li> </ul> <p>Review on 6/14/22 of Client #2's record revealed;</p> <ul style="list-style-type: none"> <li>-Age 14.</li> <li>-Admission date of 9/29/21.</li> <li>-Diagnoses of Major Depressive Disorder, Recurrent, Severe; Attention Deficit Hyperactivity Disorder, Combined Type and Sibling Relational Problem.</li> </ul> <p>Interview on 6/14/22 with Client #2 revealed:</p> <ul style="list-style-type: none"> <li>-Last court appearance was June 10th.</li> <li>-He did not miss a court date.</li> <li>-Spoke to court counselor about once every two weeks.</li> <li>-The Qualified Professional did not tell him he missed a call from his court counselor.</li> <li>-He was not aware that he was supposed to call his court counselor back.</li> </ul> <p>Interview on 6/14/22 with the Qualified Professional revealed:</p> <ul style="list-style-type: none"> <li>-The court counselor called her at 4pm.</li> <li>-She had a meeting within 15 minutes from the call.</li> <li>-She would call the court counselor back if time permitted.</li> <li>-She did not ask anyone else to call the court counselor back.</li> <li>-The court counselor was calling to speak to client #2.</li> </ul>	V 314		

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V 314	<p>Continued From page 8</p> <ul style="list-style-type: none"> <li>-She emailed the court counselor the next day, but she felt ill and had to go to urgent care.</li> <li>-She called the court counselor the following day.</li> <li>-She did not inform the clinical director her supervisor.</li> <li>-She did not ask the clinical director or anyone else to ensure client #2 called his court counselor.</li> <li>-She later discussed with the court counselor about scheduling phone calls.</li> </ul> <p>Interview on 6/15/22 with the Clinical Director revealed:</p> <ul style="list-style-type: none"> <li>-During the child/family team meeting the stakeholders reported problems with the QP.</li> <li>-She apologized to the stakeholders.</li> <li>-She gave the stakeholders her direct number.</li> <li>-The court counselor reported everything she experienced with the QP.</li> <li>-When concerns were addressed the QP did not respond.</li> <li>-She asked the QP to apologize to the stakeholders.</li> <li>-QP reported she was not going to apologize because she don't think she did anything wrong.</li> <li>-QP stated that she was busy tending to other stuff for reason she did not call the court counselor back.</li> </ul>	V 314		
V 316	<p>27G .1903 Psych. Res. Tx. Facility - Operations</p> <p>10A NCAC 27G .1903 OPERATIONS (a) A PRTF may have more than one residential unit. Each unit of a PRTF shall serve no more than 12 children or adolescents except as set out in Paragraph (b) of this Rule. Each residential unit shall be administered, staffed, and located to function separately from all other residential units in the facility.</p>	V 316		

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V 316	<p>Continued From page 9</p> <p>(b) A facility licensed to provide PRTF services with a unit capacity of greater than 12, as of the effective date of these Rules may continue to provide these services at that greater capacity and may continue to renew its license at that greater capacity.</p> <p>(c) Discharge planning shall begin on the day of admission. Efforts for discharge to a less restrictive community residential setting shall be documented from the date of admission. Legally responsible persons, family members or both and the child or adolescent shall be present at discharge planning meetings.</p> <p>(d) Each facility shall operate 24-hours a day, seven days a week and each day of the year.</p> <p>(e) Family members or other legally responsible persons shall be involved in the development and implementation of treatment plans in order to assure a smooth transition to a less restrictive setting.</p> <p>(f) Children or adolescents residing in a PRTF shall receive educational services through a facility-based school. Educational services shall meet applicable standards as required by federal and State law.</p> <p>(g) Each child or adolescent shall be entitled to age-appropriate personal belongings unless such entitlement is counter-indicated in the treatment plan.</p> <p>This Rule is not met as evidenced by: Based on record review and interviews the facility failed to ensure discharge planning began on the date of admission to a less restrictive community residential setting and should be documented</p>	V 316		

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V 316	<p>Continued From page 10</p> <p>from the date of admission for 2 of 5 audited clients (#1 and #2).</p> <p>Review on 6/14/22 of Client #1's record revealed: -Age: 12 -Admission date of 2/19/21. -Diagnoses of Attention-Deficit Hyperactivity Disorder, Combined Type and Oppositional Defiant Disorder. -Treatment Plan dated 5/25/22 included the following goals:     -"[Client #1] will eliminate all inappropriate sexual behaviors by actively engage in sex offender education and mental health therapy sessions while completing clinical assignments and activities which address healthy boundaries and socially appropriate behaviors through individual and group therapy activities as evidence by progress documented on clinical notes."</p> <p>Review on 6/14/22 of Client #1's Therapy Notes revealed following: -Individual therapy on 4/11/22, 5/7/22 and 5/14/22. -Group therapy 3/8/22, 3/24/22 and 3/25/22. -There were no family sessions. -There were no sessions focused on inappropriate sexual behaviors.</p> <p>Review on 6/14/22 of Client #1's Child/Family Team Meeting Minutes dated 5/25/22 revealed the following: -"[Client #1] will eliminate all inappropriate sexual behaviors by actively engage in sex offender education and mental health therapy sessions while completing clinical assignments and activities which address healthy boundaries and socially appropriate behaviors through individual and group therapy activities as evidence by</p>	V 316		

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V 316	<p>Continued From page 11</p> <p>progress documented on clinical notes."                      -"[Client #1's] legal guardians are concerned about [Client #1's] lack of progress. [Client #1's] mother shared that [Client #1] is able to show positive behaviors when [Client #1] wants something and [Client #1] is very manipulative. [Client #1's] mother stated she does not feel safe with [Client #1] returning to her home in the current state [Client #1] is in."                      "...We discussed a lateral move to another level 4 that specializes in problem sexual behavior (the behavior that lead to [Client #1's] placement in a psychiatric residential treatment facility - in order to begin the placement search, the team will need the following:                      -Updated and recent Percent Centered Plan;                      -An updated comprehensive clinical assessment.                      -Updated psychological evaluation (referral to services).                      -All updated school records.                      -All updated medical and medication records."                      -There was no evidence of the updated information in the record.                      -The discharge criteria form in the CFT meeting minutes was blank.</p> <p>Interview on 6/14/22 with the Qualified Professional revealed:                      -She was responsible for the discharges.                      -She would send referrals out to find placement for clients.                      -She did not receive client #1's case until May 2022.                      -There was a previous QP.                      -During the last child/family team meeting client #1's behavior was discussed.</p>	V 316		

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STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION	(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:  <b>MHL047-158</b>	(X2) MULTIPLE CONSTRUCTION A. BUILDING: _____  B. WING _____	(X3) DATE SURVEY COMPLETED  <b>06/16/2022</b>
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NAME OF PROVIDER OR SUPPLIER  <b>CANYON HILLS TREATMENT FACILITY</b>	STREET ADDRESS, CITY, STATE, ZIP CODE <b>769 ABERDEEN ROAD RAEFORD, NC 28376</b>
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V 316	<p>Continued From page 12</p> <p>Interview on 6/15/22 with the Clinical Director revealed:</p> <ul style="list-style-type: none"> <li>-She started as the Clinical Director on 4/29/22.</li> <li>-Client #1 was currently not being discharged.</li> <li>-Planning to submit referral for level III.</li> <li>-She was willing to make a recommendation for client #1 to be stepped down if he met the criteria.</li> <li>-She did an addendum on 6/1/22 for the QP to send referrals for a stepdown or lateral move.</li> <li>-She did not receive feedback from the QP on the status.</li> <li>-Client #1's next child/family team meeting was on 6/23/22.</li> <li>-Client #1's step down status would be addressed during the next CFT meeting.</li> </ul> <p>Review on 6/14/22 of Client #2's record revealed;</p> <ul style="list-style-type: none"> <li>-Age 14.</li> <li>-Admission date of 9/29/21.</li> <li>-Diagnoses of Major Depressive Disorder, Recurrent, Severe; Attention Deficit Hyperactivity Disorder, Combined Type and Sibling Relational Problem.</li> </ul> <p>Review on 6/14/22 of the Residential Treatment Application for Client #2 dated 5/12/22 revealed:</p> <ul style="list-style-type: none"> <li>-There was no signature of approval by the Legally Responsible person.</li> <li>-There was no signature of approval by the Clinical Director.</li> <li>-There was a signature by the Qualified Professional.</li> </ul> <p>Review on 6/14/22 of the Qualified Professional Emails with Residential Treatment Referral Source from May 9, 2022 - May 12, 2022 revealed:</p> <ul style="list-style-type: none"> <li>-5/9/22 - "[QP's] apologies for the double referral. Former Therapist and Clinical Director are no longer with our agency. [Clinical Director], (CC'd</li> </ul>	V 316		

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V 316	<p>Continued From page 13</p> <p>on this email) is the current clinical director and [QP] am the qualified professional who will handle [Client #2's] case. [QP] was unaware of a referral made in January as I was not working with Canyon Hills at the time."</p> <p>-5/9/22 - Referral Representative: " ...At this time, it would be prudent if we could schedule a convenient time to have the clinical conversation. [Referral Representative] can arrange it during much of tomorrow after 9:30 a.m. If not tomorrow, then [Referral Representative] have open times on Friday after 9 a.m. in between (Wednesday and Thursday). It might be challenging as there are already several things scheduled. Or we can look at next week. Look forward to response."</p> <p>-5/12/22 - QP sent an email to the referral representative with attachments of client #2's Individualized Educational Plan and Diagnostic and Clinical Assessment.</p> <p>-5/16/22 - Referral representative email to the QP - "in an effort to avoid further delay in having [Client #2's] referral reviewed, [Referral Representative] did share it with one of the treatment team members. As [Referral Representative] suspected, the information that has been sent indicates a lack of progress at Canyon Hills, ongoing behavior problems with aggression and high-intensity outburst, lack of engagement in treatment, etc. The note from [Therapist] was shared did reflect information about group therapy; some reference to some progress, but no issues related to Problematic Sexual Behavior. But the UA and PCP and Comprehensive Clinical Assessment all reference the disconcerting lack of progress and ongoing significant behavior problems. If [QP] want to give this [Client #2] an accurate review of this referral, then [QP] will need to send documents that reflect [Client #2's] progress, lack of ongoing aggression/outburst, engaging in individual/group</p>	V 316		

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V 316	<p>Continued From page 14</p> <p>therapy, etc. [Referral Representative] know that there won't be any notes reflecting progress in family therapy as it's been indicated that [Client #2] and [Client #2's guardian] only had 1 session during [Client #2's] placement at Canyon Hills. The [QP] told [Referral Representative] on 5/10/22 that [Client #2] had progress to "apology/reconciliation" phase of treatment-but that information has not been sent to us at this time."</p> <p>-5/16/22 - QP sent an email to the referral representative with an attachment of client #2's Person Centered Plan.</p> <p>-There was no additional information sent per request from the referral representative to show client #2's progress.</p> <p>Interview on 6/14/22 with Client #2 revealed: -He was supposed to step down to a level III. -He said he was not accepted because "I didn't talk enough, and my behavior was off." -"I yelled at other people, that's mainly it and aggressiveness." -He said he apologized to his sister before his first admission to treatment about one year ago.</p> <p>Interview on 6/14/22 with the Qualified Professional revealed: -Client #2's guardian requested level III placement. -She was unable to remember when the request was made. -She received a form for referral. -The referral source wanted to do a clinical phone call. -She sent the referral source client #2's Person Center Plan and assessment via email. -There was an email chain. -Client #2's behaviors did not constitute a level III. -She reported client #2's behavior was the reason</p>	V 316		

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V 316	<p>Continued From page 15</p> <p>for denial.</p> <ul style="list-style-type: none"> <li>-Sent referral on 5/9/22 and they wanted her to update it.</li> <li>-She reported that client #2 was going to apologize to his sister in a letter.</li> <li>-The family would not get that letter; it was for therapy.</li> <li>-The idea came from the previous therapist.</li> <li>-The workbook was provided before she started working at the facility.</li> <li>-She had no specialized no training with sexually aggressive adolescents.</li> <li>-She only worked in case management.</li> <li>-Request for level III was made early per guardian.</li> <li>-In January a referral was sent to the level III.</li> <li>-Client #2 was denied due to un-going aggression.</li> <li>-Receive email on 5/16/22 that client was not accepted for Level III.</li> </ul> <p>Interview on 6/15/22 with the Clinical Director revealed:</p> <ul style="list-style-type: none"> <li>-QP sent documents to get client #2 stepped down to a level III.</li> <li>-She did not know the QP was doing this.</li> <li>-QP had to follow her lead in far of recommendations.</li> <li>-The QP took it upon herself to send over paperwork.</li> <li>-She told the QP she should not send paperwork without her approval.</li> <li>-The court counselor and client #2's mother was highly upset.</li> <li>-Client #2 did not meet the criteria.</li> </ul>	V 316		