



PROGRAM AND PERSONNEL COMMITTEE

Friday, February 12, 2021
8:00 a.m.

Zoom: <https://healthwest.zoom.us/j/92718779426>
Join by Phone: (312) 626-6799, 92718779426#

Program and Personnel Committee Chair: Cheryl Natte
Program and Personnel Committee Vice-Chair: John Schrier

AGENDA

- | | <u>Disposition</u> |
|--|--------------------|
| 1) Call to Order | Quorum |
| 2) Approval of Minutes of January 8, 2021 meeting as written. (Previously Forwarded) | Action |
| 3) Items for Consideration | |
| A. Authorization to Approve the Position Changes Listed on the Enclosed Position Changes for FY 2021 County Budget Spreadsheet (Attachment #1) | Action |
| B. Authorization to Approve the Contract with Alexandria Gentzler for Med Demo Training (Attachment #2 - TBD) | Action |
| 4) Old Business | |
| 5) New Business | |
| 6) Communication | Information |
| 7) Director's Comments | Information |
| 8) Audience Participation | |
| 9) Adjournment | Action |

Main Office

376 E. Apple Ave. | Muskegon, MI 49442 | P (231) 724-1111 | F (231) 724-3659

HealthWest.net

REQUEST FOR HEALTHWEST BOARD CONSIDERATION AND AUTHORIZATION

| | | | |
|--|--|---|--------------------|
| COMMITTEE Personnel Committee | BUDGETED X | NON-BUDGETED | PARTIALLY BUDGETED |
| REQUESTING DIVISION HealthWest | REQUEST DATE February 12, 2021 | REQUESTOR SIGNATURE Julia Rupp, Executive Director | |
| <u>SUMMARY OF REQUEST (GENERAL DESCRIPTION, FINANCING, OTHER OPERATIONAL IMPACT, POSSIBLE ALTERNATIVES)</u> | | | |
| <p>HealthWest Board authorization is requested for the following position changes:</p> <ol style="list-style-type: none"> 1. The addition of one Clerical Support Specialist – hourly position (10 to 24 hours a week) for Jail Medical Services (Wage Grade HO-00070, \$13.351-\$16.333, Cost Center 7338). This is a position that already exists in the jail and HealthWest must include it in our staffing plan when we take over Jail Medical Services in March. This is a position responsible for jail inmate billing and will assist with other clerical functions as needed. 2. Reclass a Master’s Level Behavior Specialist, Position X51401 (Wage Grade HX-00300, \$27.771-\$35.108, Cost Center 7319) to a Board Certified Behavior Analyst (BCBA) (Wage Grade HX-00360, \$31.963-\$40.447, Cost Center 7319), effective January 17, 2021. This reclass is for an employee who achieved the BCBA credential, which is an effort HealthWest has been working towards for the past two years for our Autism Program. After this reclass, we will have only one master’s level position left in our autism program that is not yet a BCBA. 3. Reclass a full-time Behavior Analysis Technician, Position N11718 (Wage Grade HO-00160, \$15.314-\$19.279, Cost Center 7319) to a Lead Behavior Technician (Wage Grade HO-00210, \$18.339-\$23.095, Cost Center 7319). The Autism program has 30 Behavior Analysis Technician positions, which are supervised by the Autism Director. It is necessary to have a Lead Behavior Technician who can assist with administrative supervision as well as organizing the daily activities of the staff. 4. Change the title of Quality Improvement Specialist positions X80101, X80102 and X80103 to Quality Improvement Data Analysts. This title change is being requested to accurately reflect the responsibilities of these positions, as well as define the skill sets required to complete them. This change will strengthen our recruitment efforts to attract applicants with the qualifications to be successful in these positions and support the need for HealthWest to fulfill reporting and compliance requirements, ensure data integrity, and generate data for performance monitoring, outcomes measures, strategic planning, and compliance activities. 5. The remaining changes are funding org changes needed in order to make sure costs are allocated to the correct funding orgs. | | | |
| <u>SUGGESTED MOTION (STATE EXACTLY AS IT SHOULD APPEAR IN THE MINUTES)</u> | | | |
| I move to authorize the position changes as outlined on the attached Position Changes for FY 2021 County Budget, effective February 26, 2021. | | | |
| COMMITTEE DATE | COMMITTEE APPROVAL _____ Yes _____ No _____ Other | | |
| BOARD DATE | BOARD APPROVAL _____ Yes _____ No _____ Other | | |

Changes for FY 2021 County Budget

Personnel Committee Date: 2/12/2021
 Board Meeting Date: 2/26/2021

Positions

| New Position Title | Budget Org | % | Wage Grade |
|------------------------------------|------------|-----|------------|
| Clerical Support Specialist-Hourly | 7338 | 100 | HO-00070 |

Reassignments

| Current position Title | Current Position # | Current Wage Grade | Incumbent Employee | Current Budget Org | % | New Position Title | New Budget Org | % | New Wage Grade |
|----------------------------------|--------------------|--------------------|--------------------|--------------------|-----|---|----------------|-----------|----------------|
| Master Level Behavior Specialist | X51401 | HX - 0300 | Kristen Adams | 7319 | 100 | Board Certified Behavior Analyst (BCBA) | no change | no change | HX-00360 |
| Behavior Analysis Technician FT | N11718 | HO-00160 | Vacant | 7319 | 100 | Lead Behavior Technician | no change | no change | HO-00210 |

Replacements

| Current position Title | Current Position # | Current Wage Grade | Incumbent Employee | Current Budget Org | % | New Position Title | New Budget Org | % | New Wage Grade |
|--------------------------------|--------------------|--------------------|--------------------|--------------------|-----|----------------------------------|----------------|-----------|----------------|
| Quality Improvement Specialist | X80101 | HX-00290 | Tyler Hoerle | 7704 | 100 | Quality Improvement Data Analyst | no change | no change | No change |
| Quality Improvement Specialist | X80102 | HX-00290 | Leslie Moreno | 7704 | 100 | Quality Improvement Data Analyst | no change | no change | No change |
| Quality Improvement Specialist | X80103 | HX-00290 | vacant | 7704 | 100 | Quality Improvement Data Analyst | no change | no change | No change |

Organizational Changes

| Position Title | Position # | Incumbent employee | Budget Org | % | Budget Org | % |
|--------------------------|------------|--------------------|------------|-----|------------|-----|
| Master's Level Clinician | X533105 | Breanne Kortman | 7066 | 100 | 7350 | 100 |
| Supports Coordinator | X85257 | Vacant | 7066 | 100 | 7350 | 100 |
| Recovery Coach | N18837 | Vacant | 7066 | 100 | 7350 | 100 |

REQUEST FOR HEALTHWEST BOARD CONSIDERATION AND AUTHORIZATION

| | | | |
|---|--|---|--------------------|
| COMMITTEE Personnel Committee | BUDGETED X | NON-BUDGETED | PARTIALLY BUDGETED |
| REQUESTING DIVISION Network Development | REQUEST DATE February 12, 2021 | REQUESTOR SIGNATURE Susan Conrad, Provider Network Manager | |
| <u>SUMMARY OF REQUEST (GENERAL DESCRIPTION, FINANCING, OTHER OPERATIONAL IMPACT, POSSIBLE ALTERNATIVES)</u> | | | |
| <p>HealthWest Board authorization is requested to contract with Alexandria Gentzler, effective March 1, 2021 through December 31, 2021 to provide Med Demo training. The contractor will provide up to twenty-five (25) training sessions at a rate of \$350.00 per session. The total amount of the contract shall not exceed \$8,750.00 and will be Medicaid funded within the current budget.</p> | | | |
| <u>SUGGESTED MOTION (STATE EXACTLY AS IT SHOULD APPEAR IN THE MINUTES)</u> | | | |
| <p>I move to authorize the HealthWest Executive Director to sign a contract with Alexandria Gentzler for the period of March 1, 2021 through December 31, 2021, to provide Med Demo training, not to exceed \$8,750.00.</p> | | | |
| COMMITTEE DATE | COMMITTEE APPROVAL _____ Yes _____ No _____ Other | | |
| BOARD DATE | BOARD APPROVAL _____ Yes _____ No _____ Other | | |



RECIPIENT RIGHTS ADVISORY COMMITTEE

February 12, 2021 – 8:00 a.m.
Zoom Meeting

Zoom: <https://healthwest.zoom.us/j/92718779426>

Join by Phone: (312) 626-6799, 92718779426#

Recipient Rights Committee Chair: John Schrier
Recipient Rights Committee Vice-Chair: Stephanie Umlor

AGENDA

- | | | |
|----|--|-------------|
| 1) | Call to Order | Quorum |
| 2) | Approval of Minutes of December 4, 2020 (Previously Forwarded) | Action |
| 3) | Items for Consideration | |
| | A) Motion to Accept Recipient Rights Bi-Monthly Reports for December 2020/January 2021 (Attachment #1) | Action |
| 4) | Old Business | |
| 5) | New Business | |
| 6) | Communications | |
| | A) Recipient Rights Advisory Committee Training Memo (Attachment #2) | Information |
| 7) | Director's Comments | |
| 8) | Audience Participation | |
| 9) | Adjournment | |



BI-MONTHLY RECIPIENT RIGHTS REPORT

Date: February 12, 2021
To: Recipient Rights Advisory Committee
From: The Office of Recipient Rights
Subject: Recipient Rights Report for December 2020, and January 2021

I. TRAINING

- A. December 2, 2020, New Employee Training for 11 HealthWest employees.
- B. December 2, 2020, ORR21CMHIC: CMH Directors Interim Call was attended for 1 CEU Category I.
- C. December 4, 2020, Rights Update for 14 HealthWest employees.
- D. December 11, 2020, SUD Orientation for 1 Muskegon Recovery Center outpatient Cherry Health employee.
- E. December 22, 2020, SUD Orientation for 1 Muskegon Recovery Center outpatient Cherry Health employee.
- F. January 6, 2021, New Employee Training for 2 HealthWest employees.
- G. January 8, 2021, Rights Update for 15 HealthWest employees.
- H. January 20, 2021, New Employee Training for 9 HealthWest employees.
- I. January 22, 2021, CMH Directors Quarterly Conference Call attended for 1.5 Category 1 CEU's.

Fifty-one HealthWest and 2 Provider employees were trained for the months of December and January.

II. STATISTICAL INFORMATION

The Office of Recipient Rights received 265 incident reports and 18 rights allegations for the months of December and January. Provided for your review is the statistical data showing type and location.

III. FORMAL INVESTIGATIONS

Old Business:

- A. September 10, 2020, Wolf Lake residential DD Fa-Ho-Lo Family Inc. the Provider has door alarms on the front and back door and is using them to track when a Resident leaves without a Formal Behavioral Support Plan in place. **The allegation of RESTRICTIONS/LIMITATIONS is SUBSTANTIATED. The alarm was removed.**
- B. October 9, 2020, Wolf Lake AFC residential DD Fa-Ho-Lo Family Homes the personal spending money of the residents was misused by staff to buy PPE for Staff, pay for meals, and other uses inconsistent with the Residents' Plans of Services. **The allegation of ABUSE II – EXPLOITATION is NOT SUBSTANTIATED. The expenses were either for the direct benefit of the individual residents or were reimbursed before the completion of the investigation.**
- C. October 19, 2020, Brookmere mixed residential MOKA Non-Profit Services Corp. a Staff threatened to spank a Resident if they failed to cooperate. **The allegation of ABUSE III is SUBSTANTIATED. The Staff received verbal counseling and additional training.**
- D. October 27, 2020, out of county Beacon Home at the Bunkhouse mixed residential Beacon Specialized Living Services a Staff was engaging in a personal facetime call while calling the Residents to receive their medications. **The allegation of DISCLOSURE OF CONFIDENTIAL INFORMATION is SUBSTANTIATED. The Staff received a written reprimand and additional training.**
- E. October 27, 2020, MI Adult Supports Coordination case management HealthWest members of the treatment team entered the Recipient's apartment, took her cat to the animal pound, and let her think her ex-boyfriend had taken it. **The allegation of POSSESSION AND USE is SUBSTANTIATED. The action taken by Staff is justifiable, but Staff did not document their actions or the reasons for them. The left their employment with HealthWest before the completion of the investigation.**
- F. November 3, 2020, out of county Beacon Home at the Bunkhouse mixed residential Beacon Specialized Living Services a Staff was sleeping on the job. **The allegation of NEGLECT III is SUBSTANTIATED. The Staff received a written reprimand and additional training.**
- G. November 25, 2020, Eastwood Cottage II mixed residential Turning Leaf Residential Rehabilitation Services a Resident is required to stay in his room after 11:00 pm, because that is "bedtime." **The allegation of RESTRICTIONS/LIMITATIONS is NOT SUBSTANTIATED.**

New Business:

- A. December 7, 2020, Mill Iron mixed residential Pioneer Resources a Resident sitting at the dining room table in her wheelchair was asked to go to her bedroom, because her housemate received a telephone call and wanted privacy. When the Resident refused to leave, Staff pushed her wheelchair and threatened to tell the home supervisor how “bad” the Resident was being. When the resident grabbed the wheels of her wheelchair to prevent being forcibly removed from the table, she sustained an injury to her left wrist. **The allegation of ABUSE III is SUBSTANTIATED. The Staff was terminated from employment.**

- B. December 8, 2020, Brookmere mixed residential MOKA Non-Profit Services Corp. a Resident had a seizure and collapsed. During her examination by the Emergency Medical Technicians bruising consistent with finger marks were found on her back and bruising was found on her legs. She was admitted to the hospital. **The allegation of ABUSE II – NONACCIDENTAL ACT is NOT SUBSTANTIATED.**

- C. December 28, 2020, Virginia’s House mixed residential HGA Non-Profit Homes Inc. the Residents have not had proper foot care resulting in curled-over toenails and foot fungus. **The investigation into the allegation of SERVICES SUITED TO CONDITION is not complete.**

- D. January 5, 2021, Graceland mixed residential MOKA Non-Profit Services Corp. a Staff called a Resident a “b---ch!” **The allegation of ABUSE III is NOT SUBSTANTIATED.**

- E. January 27, 2021, out of county Beacon Home at the Bunkhouse mixed residential Beacon Specialized Living Services Staff yelled at a Resident to give them a minute, because she was not ready when the Resident wanted to go to the store. **The investigation into the allegation of DIGNITY AND RESPECT is not complete.**

- F. January 29, 2021, Mill Iron mixed residential Pioneer Resources two Staff were laughing and joking about a Resident who “couldn’t hold her pee” after assisting her with changing her. **The investigation into the allegation of DIGNITY AND RESPECT is not complete.**

- G. January 29, 2021, Ducey residential DD Samaritas a Staff took two Residents on an unscheduled outing and left four Residents with the remaining Staff in violation of Samaritas policy. **The investigation into the allegation of NEGLECT III is not complete.**

IV. INTERVENTIONS

Old Business:

None

New Business:

January 5, 2021, Beacon Home at Blue Lake ^{mixed residential} Beacon Specialized Living Services a Resident stole another Resident's bank card then tried to implicate the staff that drove her to the store when she got caught. **OUTSIDE PROVIDER JURISDICTION the Resident was already involved with criminal proceedings and was referred to her attorney and the Prosecutor's Office.**

V. SUBSTANCE USE DISORDER

Old Business:

None

New Business:

None

VI. DEATHS

- A. August 9, 2020, an 18 year old male Recipient died at home from kidney failure. He had been sent home to family with palliative care.
- B. September 24, 2020, a 61 year old female Recipient receiving MI Adult Supports Coordination died at home from lung cancer with metastases.
- C. October 21, 2020, a 61 year old female Recipient receiving MI Adult Supports Coordination died from septic shock associated with pneumonia.
- D. October 21, 2020, a 38 year old male Recipient of MI Adult Supports Coordination died at home from cardiopulmonary arrest.
- E. November 1, 2020, a 65 year old male Recipient receiving MI Adult Supports Coordination died at mercy Hospital from Covid 19.
- F. November 22, 2020, a 48 female Recipient living at Ruddiman ^{residential DD} Pioneer Resources died of inanition. She was under the care of Hospice.

Recipient Rights Report

February 12, 2021

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- G. December 10, 2020, a 53 year old male Recipient living at Shaffer residential DD HGA Non-Profit Homes Inc., died at Mercy Hospital from Covid 19.
- H. December 11, 2020, a 69 year old male Recipient living at Amanda residential DD Fa-Ho-Lo Family Inc. died at Mercy Hospital from pneumonia.
- I. December 18, 2020, a 59 year old female Recipient living at Cedar Creek Personal Care Home mixed residential Lakeshore Care Corp. died at Mercy Hospital from cardiac arrest.
- J. December 22, 2020, a 27 year old male Recipient receiving MI Adult Supports Coordination died from an accidental overdose.
- K. January 4, 2021, a 72 year old male Recipient living at Beachwood Dunes mixed residential MOKA Non-Profit Services Corp. died at Mercy Hospital from pneumonia, sepsis, and a twisted bowel. He had been taken to the emergency department on December 29, 2020, but was returned home, and home staff were told the symptoms were due to his dementia.
- L. January 8, 2021, a 70 year old male Recipient living at Harbor Pines mixed residential MOKA Non-Profit Services Corp. died from complications from pneumonia. He was under the care of Hospice and the Hospice protocols were followed.
- M. January 24, 2021, a 58 year old male Recipient receiving MI Adult Supports Coordination died in the community of unknown natural causes.



Recipient Rights Violations reported grouped by MDCH Violation Code, sorted in ascending order by date of occurrence, with subtotals by group and grand totals.

Reported Incidents by State Violation Code

Confidentiality/Privileged Communication/Disclosure

7481 Disclosure of Confidential Information

| | | | | Actions by Provider | Actions by ORR | Resolution |
|----------|------------|------|------|---------------------|----------------|-------------------|
| 10/19/20 | 2020-91559 | M.K. | 41 F | Other | Investigation | Not Substantiated |
| 10/20/20 | 2020-91704 | D.D. | 49 M | Training | Investigation | Substantiated |

Reported Incidents for this Code: **2**

Reported Incidents for this Group: **2**

Freedom from Abuse

72221 Abuse Class II - Non-Accidental Act

| | | | | Actions by Provider | Actions by ORR | Resolution |
|----------|------------|------|----|---------------------|----------------|-------------------|
| 12/04/20 | 2020-92088 | L.P. | 60 | Other | Investigation | Not Substantiated |

Reported Incidents for this Code: **1**

72225 Abuse, Class II - Exploitation

| | | | | Actions by Provider | Actions by ORR | Resolution |
|----------|------------|------|------|-----------------------------|----------------|-------------------|
| 10/08/20 | 2020-91447 | L.K. | 56 F | Policy Revision/Development | Investigation | Not Substantiated |
| 10/10/20 | 2020-91465 | C.O. | 74 F | Employment Termination | Investigation | Substantiated |
| 10/08/20 | 2020-91449 | R.H. | 39 F | Policy Revision/Development | Investigation | Not Substantiated |
| 10/08/20 | 2020-91448 | F.V. | 76 F | Policy Revision/Development | Investigation | Not Substantiated |
| 10/08/20 | 2020-91450 | J.L. | 71 F | Policy Revision/Development | Investigation | Not Substantiated |
| 10/08/20 | 2020-91446 | L.C. | 73 F | Policy Revision/Development | Investigation | Not Substantiated |
| 10/08/20 | 2020-91445 | P.M. | 73 M | Policy Revision/Development | Investigation | Not Substantiated |

Reported Incidents for this Code: **7**

7223 Abuse Class III

| | | | | Actions by Provider | Actions by ORR | Resolution |
|----------|------------|------|------|------------------------|----------------|-------------------|
| 10/13/20 | 2020-91537 | L.P. | 60 F | Training | Investigation | Substantiated |
| 12/03/20 | 2020-92087 | J.S. | 62 F | Employment Termination | Investigation | Substantiated |
| 12/25/20 | 2021-92291 | N.I. | 47 F | | Investigation | Not Substantiated |

Reported Incidents for this Code: **3**

Reported Incidents for this Group: **11**

Freedom from Neglect

72271 Neglect Class III

| | | | | Actions by Provider | Actions by ORR | Resolution |
|----------|------------|------|------|------------------------|----------------|---------------|
| 01/31/21 | 2021-92482 | S.K. | 43 F | | Investigation | |
| 10/04/20 | 2020-91441 | G.H. | 59 M | Employment Termination | Investigation | Substantiated |
| 10/04/20 | 2020-91440 | W.H. | 65 M | Employment Termination | Investigation | Substantiated |
| 10/04/20 | 2020-91439 | O.W. | 75 M | Employment Termination | Investigation | Substantiated |
| 10/04/20 | 2020-91438 | T.F. | 73 M | Employment Termination | Investigation | Substantiated |
| 10/04/20 | 2020-91437 | J.H. | 70 M | Employment Termination | Investigation | Substantiated |
| 01/27/21 | 2021-92474 | R.D. | 65 M | | Investigation | |
| 10/04/20 | 2020-91442 | K.L. | 61 M | Employment Termination | Investigation | Substantiated |
| 01/31/21 | 2021-92481 | D.R. | 62 M | | Investigation | |
| 12/31/20 | 2020-89217 | J.H. | 70 M | Employment Termination | Investigation | Substantiated |
| 01/27/21 | 2021-92477 | J.P. | 38 M | | Investigation | |
| 01/27/21 | 2021-92476 | C.S. | 28 M | | Investigation | |
| 01/27/21 | 2021-92475 | J.W. | 62 M | | Investigation | |
| 11/01/20 | 2020-91822 | D.D. | 49 M | Written Reprimand | Investigation | Substantiated |

Reported Incidents for this Code: **14**

Reported Incidents by State Violation Code

Reported Incidents for this Group: **14**

Freedom of Movement

7441 Restrictions/Limitations

| | | | | | Actions by Provider | Actions by ORR | Resolution |
|----------|------------|------|----|---|---------------------|----------------|-------------------|
| 11/23/20 | 2020-92022 | W.P. | 43 | M | Other | Investigation | Not Substantiated |

Reported Incidents for this Code: **1**

Reported Incidents for this Group: **1**

Outside Provider Jurisdiction

0001 Outside Provider Jurisdiction

| | | | | | Actions by Provider | Actions by ORR | Resolution |
|----------|------------|------|----|---|---------------------|----------------|------------|
| 12/15/20 | 2021-92290 | T.R. | 46 | F | Other | Intervention | Referral |

Reported Incidents for this Code: **1**

Reported Incidents for this Group: **1**

Personal Property

7281 Possession and Use

| | | | | | Actions by Provider | Actions by ORR | Resolution |
|----------|------------|------|----|---|-----------------------------|----------------|---------------|
| 10/23/20 | 2020-91705 | B.R. | 42 | F | Employee Left the Agency, b | Investigation | Substantiated |

Reported Incidents for this Code: **1**

Reported Incidents for this Group: **1**

Suitable Services

7080 Services Suited to Condition/Medication

| | | | | | Actions by Provider | Actions by ORR | Resolution |
|----------|------------|------|----|---|---------------------|----------------|------------|
| 12/22/20 | 2020-92249 | L.G. | 70 | F | | Investigation | |
| 12/22/20 | 2020-92248 | E.D. | 20 | F | | Investigation | |
| 12/22/20 | 2020-92250 | S.H. | 59 | M | | Investigation | |
| 12/22/20 | 2020-92251 | E.S. | 54 | F | | Investigation | |
| 12/22/20 | 2020-92247 | C.O. | 74 | F | | Investigation | |

Reported Incidents for this Code: **5**

Reported Incidents for this Group: **5**

Treatment Environment

1708 Dignity & Respect

| | | | | | Actions by Provider | Actions by ORR | Resolution |
|----------|------------|------|----|---|---------------------|----------------|------------|
| 01/27/21 | 2021-92472 | D.D. | 50 | M | | Investigation | |
| 01/27/21 | 2021-92473 | J.S. | 63 | F | | Investigation | |

Reported Incidents for this Code: **2**

7082 Sanitary/Humane

| | | | | | Actions by Provider | Actions by ORR | Resolution |
|----------|------------|------|----|---|---------------------|----------------|-------------------|
| 10/11/20 | 2020-91451 | D.M. | 63 | M | Other | Investigation | Not Substantiated |

Reported Incidents for this Code: **1**

Reported Incidents for this Group: **3**

Reported Incidents for this Period: **38**



Recipient Rights Summary by Incident Type

For the Period from December 1, 2020
through January 31, 2021

Recipient Rights Violations reported grouped by MDCH Violation Code, sorted in ascending order by date of occurrence, with subtotals by group and grand totals.

Reported Incidents by State Violation Code

Freedom from Abuse

72221 Abuse Class II - Non-Accidental Act

| | | | | |
|----------|------------|------|----|--|
| 12/04/20 | 2020-92088 | L.P. | 60 | |
|----------|------------|------|----|--|

Reported Incidents for this Code: 1

7223 Abuse Class III

| | | | | |
|----------|------------|------|----|---|
| 12/25/20 | 2021-92291 | N.I. | 47 | F |
| 12/03/20 | 2020-92087 | J.S. | 62 | F |

Reported Incidents for this Code: 2

Reported Incidents for this Group: 3

Reported Incidents for this Code: 2

Reported Incidents for this Group: 2

Freedom from Neglect

72271 Neglect Class III

| | | | | |
|----------|------------|------|----|---|
| 01/31/21 | 2021-92482 | S.K. | 43 | F |
| 01/31/21 | 2021-92481 | D.R. | 62 | M |
| 01/27/21 | 2021-92477 | J.P. | 38 | M |
| 01/27/21 | 2021-92476 | C.S. | 28 | M |
| 01/27/21 | 2021-92475 | J.W. | 62 | M |
| 01/27/21 | 2021-92474 | R.D. | 65 | M |
| 12/31/20 | 2020-89217 | J.H. | 70 | M |

Reported Incidents for this Code: 7

Reported Incidents for this Group: 7

Outside Provider Jurisdiction

0001 Outside Provider Jurisdiction

| | | | | |
|----------|------------|------|----|---|
| 12/15/20 | 2021-92290 | T.R. | 46 | F |
|----------|------------|------|----|---|

Reported Incidents for this Code: 1

Reported Incidents for this Group: 1

Suitable Services

7080 Services Suited to Condition/Medication

| | | | | |
|----------|------------|------|----|---|
| 12/22/20 | 2020-92251 | E.S. | 54 | F |
| 12/22/20 | 2020-92250 | S.H. | 59 | M |
| 12/22/20 | 2020-92249 | L.G. | 70 | F |
| 12/22/20 | 2020-92248 | E.D. | 20 | F |
| 12/22/20 | 2020-92247 | C.O. | 74 | F |

Reported Incidents for this Code: 5

Reported Incidents for this Group: 5

Treatment Environment

1708 Dignity & Respect

| | | | | |
|----------|------------|------|----|---|
| 01/27/21 | 2021-92473 | J.S. | 63 | F |
| 01/27/21 | 2021-92472 | D.D. | 50 | M |

Reported Incidents by State Violation Code

Reported Incidents for this Period: **18**

Report rRecipient Rights Violations - State Codes based on Query
qRecipient Rights Violations - State Codes Rev 060898



Recipient Rights Summary by Incident Type

For the Period from December 1, 2020
through January 31, 2021

Recipient Rights Violations reported grouped by CMH Violation Code, sorted in ascending order by date of occurrence, with subtotals by group and grand totals.

Reported Incidents by Local Violation Code

Incident Type

0100 Aggressive Target

| | | | |
|----------|------------|------|----|
| 01/04/21 | 2021-92424 | B.N. | 17 |
| 12/19/20 | 2021-92325 | E.J. | 70 |
| 12/12/20 | 2021-92293 | C.R. | 59 |
| 01/02/21 | 2021-92422 | T.K. | 60 |
| 12/07/20 | 2021-92423 | T.M. | 5 |
| 12/05/20 | 2020-92257 | P.S. | 23 |
| 12/08/20 | 2020-92233 | J.F. | 6 |
| 12/04/20 | 2020-92234 | J.U. | 14 |

Reported Incidents for this Code: **8**

0102 Disruptive Behavior

| | | | | |
|----------|------------|------|----|---|
| 12/07/20 | 2021-92451 | A.H. | 21 | |
| 12/30/20 | 2021-92360 | J.B. | 35 | M |
| 12/28/20 | 2021-92361 | R.W. | 54 | |
| 12/30/20 | 2021-92362 | R.W. | 54 | |
| 01/10/21 | 2021-92478 | W.P. | 44 | M |
| 12/22/20 | 2021-92363 | P.S. | 23 | |
| 12/31/20 | 2021-92368 | D.C. | 62 | |
| 12/21/20 | 2021-92409 | W.P. | 43 | |
| 01/05/21 | 2021-92428 | D.S. | 54 | |
| 12/25/20 | 2021-92452 | M.M. | 40 | |
| 12/26/20 | 2021-92357 | D.M. | 30 | |
| 01/07/21 | 2021-92437 | P.M. | 59 | |
| 12/19/20 | 2021-92327 | W.P. | 43 | |
| 01/03/21 | 2021-92432 | W.P. | 44 | |
| 12/31/20 | 2021-92433 | W.P. | 43 | |
| 01/07/21 | 2021-92435 | R.W. | 55 | |
| 12/21/20 | 2021-92412 | W.P. | 43 | |
| 12/08/20 | 2020-92289 | S.C. | 36 | |
| 12/02/20 | 2020-92204 | C.P. | 26 | |
| 12/02/20 | 2020-92218 | M.M. | 39 | |
| 12/01/20 | 2020-92222 | D.H. | 35 | |
| 12/06/20 | 2020-92227 | R.R. | 47 | |
| 12/05/20 | 2020-92259 | W.P. | 43 | |
| 12/07/20 | 2020-92260 | W.P. | 43 | |
| 12/10/20 | 2020-92267 | C.B. | 68 | |
| 12/10/20 | 2020-92268 | J.M. | 40 | |
| 12/21/20 | 2021-92333 | W.P. | 43 | |
| 12/10/20 | 2020-92275 | W.P. | 43 | |
| 12/22/20 | 2021-92337 | E.D. | 20 | |
| 12/14/20 | 2021-92295 | M.H. | 64 | |
| 12/11/20 | 2021-92298 | J.S. | 18 | |
| 12/16/20 | 2021-92300 | B.C. | 29 | |
| 12/18/20 | 2021-92324 | W.P. | 43 | |
| 12/15/20 | 2021-92326 | W.P. | 43 | |
| 12/27/20 | 2021-92370 | R.W. | 54 | |
| 12/19/20 | 2021-92328 | R.R. | 47 | |
| 01/06/21 | 2021-92479 | B.C. | 30 | |
| 12/11/20 | 2020-92271 | B.C. | 29 | |
| 01/12/21 | 2021-92493 | T.C. | 30 | |

| | | | |
|----------|------------|------|----|
| 12/24/20 | 2021-92501 | N.I. | 47 |
| 01/14/21 | 2021-92523 | C.B. | 71 |
| 01/12/21 | 2021-92494 | W.P. | 88 |
| 01/11/21 | 2021-92515 | J.H. | 40 |
| 01/11/21 | 2021-92483 | R.W. | 55 |

Reported Incidents for this Code: **44**

0103 Charting Error

| | | | |
|----------|------------|------|----|
| 12/27/20 | 2021-92502 | L.L. | 56 |
|----------|------------|------|----|

Reported Incidents for this Code: **1**

0104 Medication Error - Person

| | | | | |
|----------|------------|------|----|---|
| 01/02/21 | 2021-92466 | B.G. | 46 | F |
| 01/02/21 | 2021-92427 | B.G. | 46 | F |
| 01/08/21 | 2021-92460 | L.K. | 59 | |

Reported Incidents for this Code: **3**

0105 Treatment Error

| | | | |
|----------|------------|------|----|
| 12/12/20 | 2021-92319 | M.M. | 58 |
| 12/22/20 | 2021-92334 | S.H. | 59 |
| 12/22/20 | 2021-92404 | E.S. | 54 |
| 12/22/20 | 2021-92335 | L.G. | 70 |
| 12/22/20 | 2021-92336 | C.O. | 74 |

Reported Incidents for this Code: **5**

0106 Medication Refused

| | | | |
|----------|------------|------|----|
| 01/17/21 | 2021-92525 | C.B. | 71 |
| 12/13/20 | 2021-92294 | D.S. | 53 |
| 12/08/20 | 2020-92266 | T.B. | 39 |
| 12/13/20 | 2020-92276 | K.H. | 44 |
| 12/17/20 | 2021-92355 | K.H. | 44 |
| 12/04/20 | 2021-92366 | M.M. | 40 |
| 01/06/21 | 2021-92429 | T.R. | 47 |
| 12/17/20 | 2021-92321 | K.H. | 44 |
| 12/23/20 | 2021-92345 | T.R. | 46 |
| 12/08/20 | 2020-92245 | T.B. | 39 |
| 12/13/20 | 2020-92282 | D.S. | 53 |
| 01/10/21 | 2021-92465 | C.F. | 28 |
| 01/10/21 | 2021-92464 | T.R. | 47 |
| 01/10/21 | 2021-92463 | T.R. | 47 |
| 01/09/21 | 2021-92462 | T.R. | 47 |
| 01/08/21 | 2021-92461 | T.R. | 47 |
| 12/13/20 | 2020-92277 | D.S. | 53 |
| 01/07/21 | 2021-92438 | P.M. | 59 |
| 01/07/21 | 2021-92454 | T.R. | 47 |

Reported Incidents for this Code: **19**

0107 Medication Error - Time

| | | | |
|----------|------------|------|----|
| 12/29/20 | 2021-92505 | M.M. | 40 |
| 12/20/20 | 2021-92331 | D.P. | 43 |
| 01/03/21 | 2021-92507 | B.B. | 38 |
| 12/28/20 | 2021-92455 | S.T. | 29 |

Reported Incidents by Local Violation Code

| | | | |
|----------|------------|------|----|
| 12/12/20 | 2020-92287 | V.S. | 34 |
| 12/02/20 | 2021-92521 | B.D. | 31 |

Reported Incidents for this Code: **6**

0108 Medication Not Available to Administer

| | | | |
|----------|------------|------|----|
| 12/29/20 | 2021-92372 | P.S. | 23 |
| 12/02/20 | 2021-92309 | H.T. | 59 |
| 01/04/21 | 2021-92426 | M.L. | 59 |
| 12/14/20 | 2021-92393 | L.P. | 60 |
| 12/03/20 | 2021-92308 | H.T. | 59 |
| 12/11/20 | 2021-92388 | L.P. | 60 |
| 12/01/20 | 2020-92209 | J.H. | 39 |
| 01/12/21 | 2021-92496 | M.M. | 40 |
| 12/12/20 | 2021-92390 | L.P. | 60 |
| 12/16/20 | 2021-92301 | B.C. | 29 |

Reported Incidents for this Code: **10**

0113 Death

| | | | | |
|----------|------------|------|----|---|
| 12/18/20 | 2021-92332 | P.S. | 59 | F |
| 12/22/20 | 2021-92344 | M.M. | 27 | M |
| 12/10/20 | 2021-92304 | N.S. | 37 | M |
| 12/10/20 | 2020-92283 | J.R. | 53 | M |
| 01/08/21 | 2021-92469 | J.H. | 71 | M |
| 12/11/20 | 2021-92305 | D.S. | 69 | M |

Reported Incidents for this Code: **6**

0115 Fall

| | | | | |
|----------|------------|------|----|---|
| 12/22/20 | 2021-92367 | R.H. | 39 | |
| 12/31/20 | 2021-92371 | R.W. | 54 | |
| 01/13/21 | 2021-92529 | G.K. | 76 | |
| 12/01/20 | 2020-92239 | L.P. | 60 | |
| 12/25/20 | 2021-92348 | D.L. | 68 | M |
| 12/19/20 | 2021-92499 | R.L. | 49 | |
| 12/03/20 | 2021-92378 | L.P. | 60 | |
| 12/10/20 | 2020-92284 | V.S. | 34 | |
| 12/12/20 | 2020-92288 | A.H. | 42 | |
| 01/09/21 | 2021-92513 | R.N. | 47 | |
| 12/05/20 | 2020-92256 | S.C. | 69 | |
| 12/12/20 | 2021-92303 | J.M. | 72 | |
| 01/06/21 | 2021-92509 | J.P. | 38 | |
| 12/14/20 | 2020-92272 | B.C. | 29 | |
| 12/02/20 | 2020-92241 | L.P. | 60 | |
| 01/01/21 | 2021-92506 | B.B. | 38 | |
| 12/02/20 | 2020-92244 | L.P. | 60 | |
| 12/02/20 | 2020-92243 | L.P. | 60 | |
| 12/02/20 | 2020-92242 | L.P. | 60 | |
| 12/22/20 | 2021-92339 | R.N. | 46 | |
| 12/22/20 | 2021-92340 | R.N. | 46 | |
| 12/08/20 | 2021-92315 | A.W. | 70 | |
| 12/22/20 | 2021-92492 | L.P. | 60 | |
| 12/15/20 | 2021-92394 | L.P. | 60 | |
| 12/15/20 | 2021-92395 | L.P. | 60 | |
| 12/20/20 | 2021-92396 | L.P. | 60 | |
| 12/20/20 | 2021-92397 | L.P. | 60 | |
| 12/12/20 | 2021-92389 | L.P. | 60 | |
| 12/20/20 | 2021-92398 | L.P. | 60 | |
| 12/11/20 | 2021-92387 | L.P. | 60 | |
| 12/10/20 | 2021-92386 | L.P. | 60 | |
| 12/09/20 | 2021-92385 | L.P. | 60 | |
| 12/14/20 | 2021-92392 | L.P. | 60 | |

| | | | |
|----------|------------|------|----|
| 12/24/20 | 2021-92406 | B.C. | 29 |
| 12/30/20 | 2021-92403 | J.J. | 58 |
| 01/11/21 | 2021-92490 | L.P. | 61 |
| 12/09/20 | 2021-92384 | L.P. | 60 |
| 12/08/20 | 2021-92383 | L.P. | 60 |
| 01/02/21 | 2021-92489 | J.J. | 59 |
| 12/08/20 | 2021-92382 | L.P. | 60 |
| 12/04/20 | 2021-92381 | L.P. | 60 |
| 12/04/20 | 2021-92380 | L.P. | 60 |
| 01/04/21 | 2021-92434 | R.W. | 55 |
| 12/08/20 | 2021-92488 | L.P. | 60 |
| 01/04/21 | 2021-92487 | L.P. | 61 |
| 12/29/20 | 2021-92441 | R.N. | 46 |
| 01/04/21 | 2021-92486 | L.P. | 61 |

Reported Incidents for this Code: **47**

0117 Inappropriate Sexual Expression

| | | | |
|----------|------------|------|----|
| 12/31/20 | 2021-92405 | W.P. | 43 |
|----------|------------|------|----|

Reported Incidents for this Code: **1**

0118 Medical Problem

| | | | | |
|----------|------------|------|----|---|
| 12/05/20 | 2021-92400 | L.K. | 58 | |
| 12/06/20 | 2020-92231 | R.N. | 46 | |
| 01/04/21 | 2021-92430 | A.P. | 32 | |
| 01/06/21 | 2021-92431 | O.L. | 39 | |
| 12/13/20 | 2020-92281 | D.B. | 67 | |
| 12/20/20 | 2021-92329 | D.B. | 67 | M |
| 12/04/20 | 2020-92225 | F.V. | 76 | |
| 01/04/21 | 2021-92408 | L.G. | 20 | |
| 12/01/20 | 2020-92226 | H.P. | 42 | |
| 12/02/20 | 2020-92220 | D.B. | 67 | M |
| 01/06/21 | 2021-92510 | J.P. | 38 | |
| 01/04/21 | 2021-92425 | L.G. | 20 | |
| 12/31/20 | 2021-92470 | J.M. | 72 | M |
| 12/05/20 | 2021-92313 | A.W. | 70 | |
| 12/15/20 | 2021-92297 | T.K. | 59 | |
| 12/02/20 | 2020-92238 | L.K. | 58 | |
| 12/27/20 | 2021-92373 | J.H. | 70 | |
| 01/05/21 | 2021-92471 | J.M. | 73 | M |
| 01/03/21 | 2021-92369 | T.R. | 47 | |
| 12/08/20 | 2020-92261 | R.G. | 43 | M |
| 12/28/20 | 2021-92375 | J.H. | 70 | M |
| 12/26/20 | 2021-92353 | B.C. | 29 | F |
| 12/08/20 | 2021-92376 | R.G. | 60 | M |
| 12/17/20 | 2021-92322 | G.C. | 43 | |

Reported Incidents for this Code: **24**

0119 Non-Serious Injury

| | | | | |
|----------|------------|------|----|--|
| 01/12/21 | 2021-92491 | L.P. | 61 | |
| 12/07/20 | 2021-92314 | A.W. | 70 | |
| 12/07/20 | 2020-92253 | N.I. | 47 | |
| 12/02/20 | 2020-92255 | S.C. | 69 | |
| 01/09/21 | 2021-92512 | D.S. | 64 | |
| 12/06/20 | 2020-92258 | P.S. | 23 | |
| 01/13/21 | 2021-92516 | O.L. | 39 | |
| 01/15/21 | 2021-92527 | D.D. | 50 | |
| 01/18/21 | 2021-92528 | A.W. | 71 | |
| 12/12/20 | 2021-92391 | L.P. | 60 | |
| 12/07/20 | 2020-92240 | J.J. | 58 | |
| 12/09/20 | 2021-92318 | K.M. | 53 | |

Reported Incidents by Local Violation Code

| | | | |
|----------|------------|------|----|
| 12/08/20 | 2021-92343 | O.B. | 3 |
| 12/03/20 | 2021-92379 | L.P. | 60 |
| 12/23/20 | 2021-92500 | O.L. | 38 |
| 12/02/20 | 2020-92252 | N.I. | 47 |
| 12/15/20 | 2020-92280 | R.L. | 49 |
| 12/05/20 | 2020-92232 | J.S. | 62 |

Reported Incidents for this Code: **18**

0120 Destructive Behavior

| | | | |
|----------|------------|------|----|
| 12/23/20 | 2021-92351 | W.P. | 43 |
| 12/22/20 | 2021-92350 | W.P. | 43 |
| 01/07/21 | 2021-92484 | R.R. | 48 |
| 12/04/20 | 2021-92365 | M.M. | 40 |
| 12/07/20 | 2021-92317 | T.R. | 62 |

Reported Incidents for this Code: **5**

0121 Serious Injury

| | | | | |
|----------|------------|------|----|---|
| 12/22/20 | 2021-92349 | C.P. | 20 | M |
| 12/06/20 | 2021-92399 | M.J. | 44 | M |
| 01/15/21 | 2021-92524 | C.B. | 71 | |
| 12/16/20 | 2021-92320 | L.G. | 70 | F |

Reported Incidents for this Code: **4**

0123 Suspected Criminal Offense

| | | | |
|----------|------------|------|----|
| 12/15/20 | 2021-92299 | T.R. | 46 |
| 12/02/20 | 2020-92219 | T.R. | 46 |

Reported Incidents for this Code: **2**

0124 ULOA (Unauthorized Leave or Elopement)

| | | | |
|----------|------------|------|----|
| 01/01/21 | 2021-92416 | L.C. | 29 |
| 12/26/20 | 2021-92358 | D.M. | 30 |
| 01/05/21 | 2021-92419 | R.J. | 21 |
| 12/31/20 | 2021-92417 | J.S. | 51 |
| 12/17/20 | 2021-92354 | K.S. | 45 |
| 12/31/20 | 2021-92418 | R.A. | 61 |

Reported Incidents for this Code: **6**

0125 Other

| | | | |
|----------|------------|------|----|
| 12/08/20 | 2020-92229 | R.S. | 18 |
| 12/08/20 | 2020-92265 | L.G. | 19 |
| 12/08/20 | 2020-92264 | T.R. | 46 |
| 12/08/20 | 2020-92230 | J.T. | 29 |
| 12/08/20 | 2020-92263 | M.M. | 39 |
| 01/15/21 | 2021-92519 | D.P. | 34 |
| 12/08/20 | 2020-92262 | S.P. | 40 |
| 01/19/21 | 2021-92526 | B.L. | 49 |
| 12/08/20 | 2020-92228 | S.K. | 35 |
| 12/07/20 | 2020-92224 | T.W. | 38 |
| 12/07/20 | 2020-92223 | K.S. | 54 |
| 01/15/21 | 2021-92520 | A.G. | 32 |
| 12/02/20 | 2020-92203 | G.M. | 23 |
| 01/11/21 | 2021-92458 | D.M. | 31 |
| 01/15/21 | 2021-92518 | B.S. | 29 |
| 12/28/20 | 2021-92347 | J.K. | 38 |
| 12/28/20 | 2021-92346 | A.G. | 31 |
| 01/06/21 | 2021-92411 | J.B. | 44 |
| 12/27/20 | 2021-92495 | G.K. | 75 |
| 01/14/21 | 2021-92497 | B.L. | 28 |
| 12/01/20 | 2020-92199 | J.Y. | 31 |
| 01/14/21 | 2021-92498 | W.D. | 25 |

| | | | |
|----------|------------|------|----|
| 01/05/21 | 2021-92374 | S.B. | 20 |
| 01/11/21 | 2021-92457 | R.K. | 27 |
| 01/11/21 | 2021-92456 | E.B. | 54 |
| 01/11/21 | 2021-92459 | R.V. | 30 |
| 12/17/20 | 2021-92292 | M.A. | 49 |
| 12/16/20 | 2020-92286 | T.W. | 36 |
| 12/14/20 | 2020-92279 | T.B. | 39 |
| 12/14/20 | 2020-92278 | J.L. | 22 |
| 01/08/21 | 2021-92467 | S.S. | 50 |
| 01/15/21 | 2021-92517 | J.W. | 32 |
| 12/14/20 | 2020-92270 | J.C. | 49 |
| 12/14/20 | 2020-92269 | N.C. | 46 |
| 12/29/20 | 2021-92352 | W.D. | 24 |

Reported Incidents for this Code: **35**

0127 Dangerous Behavior

| | | | | |
|----------|------------|------|----|---|
| 01/01/21 | 2021-92407 | B.C. | 30 | F |
| 01/02/21 | 2021-92421 | T.K. | 60 | |
| 01/06/21 | 2021-92453 | A.H. | 22 | M |
| 01/07/21 | 2021-92442 | J.H. | 40 | |
| 12/20/20 | 2021-92330 | D.P. | 43 | |
| 12/09/20 | 2020-92273 | P.S. | 23 | |
| 01/11/21 | 2021-92514 | J.H. | 40 | M |
| 01/08/21 | 2021-92511 | O.L. | 39 | |
| 12/14/20 | 2021-92302 | B.C. | 29 | |
| 12/18/20 | 2021-92356 | K.H. | 44 | |
| 12/18/20 | 2021-92323 | B.C. | 29 | F |
| 01/12/21 | 2021-92503 | J.H. | 40 | |
| 12/21/20 | 2021-92338 | T.K. | 59 | |
| 01/08/21 | 2021-92480 | B.C. | 30 | F |
| 12/18/20 | 2021-92359 | G.P. | 10 | |

Reported Incidents for this Code: **15**

0128 Medication Error - Inventory

| | | | |
|----------|------------|------|----|
| 12/11/20 | 2021-92364 | J.D. | 46 |
| 12/15/20 | 2021-92402 | J.J. | 58 |
| 12/15/20 | 2021-92401 | J.J. | 58 |
| 12/12/20 | 2021-92296 | W.H. | 56 |
| 12/18/20 | 2021-92522 | D.M. | 63 |
| 01/04/21 | 2021-92508 | B.B. | 38 |

Reported Incidents for this Code: **6**

Reported Incidents for this Group: **265**

Reported Incidents by Local Violation Code

Reported Incidents for this Period: **265**

Report rRecipient Rights Violations - Local Codes based on Query
qRecipient Rights Violations - Local Codes Rev 060898



MEMORANDUM

DATE: February 12, 2021
 TO: Recipient Rights Advisory Committee
 FROM: Lawrence O Spataro
 SUBJECT: Committee Training

In previous trainings we reviewed the establishment of the Recipient Rights system in the Mental Health Code, the role of the Recipient Rights Advisory Committee, and how the complaint process is initiated. Today we will review the statutory requirements regarding how a Recipient Rights complaint investigation is conducted.

330.1778 Investigation; initiation; recording; standard of proof; written status report; written investigative report; new evidence.

Sec. 778.

(1) The office shall initiate investigation of apparent or suspected rights violations in a timely and efficient manner. Subject to delays involving pending action by external agencies as described in subsection (5), the office shall complete the investigation not later than 90 days after it receives the rights complaint. Investigation shall be initiated immediately in cases involving alleged abuse, neglect, serious injury, or death of a recipient involving an apparent or suspected rights violation.

(2) Investigation activities for each rights complaint shall be accurately recorded by the office.

(3) The office shall determine whether a right was violated by using the preponderance of the evidence as its standard of proof.

(4) The office shall issue a written status report every 30 calendar days during the course of the investigation. The report shall be submitted to the complainant, the respondent, and the responsible mental health agency. A status report shall include all of the following:

- (a) Statement of the allegations.
- (b) Statement of the issues involved.
- (c) Citations to relevant provisions of this act, rules, policies, and guidelines.
- (d) Investigative progress to date.
- (e) Expected date for completion of the investigation.

(5) Upon completion of the investigation, the office shall submit a written investigative report to the respondent and to the responsible mental health agency. Issuance of the written investigative report may be delayed pending completion of investigations that involve external agencies, including law enforcement agencies and the department of social services. The report shall include all of the following:

- (a) Statement of the allegations.
- (b) Statement of the issues involved.
- (c) Citations to relevant provisions of this act, rules, policies, and guidelines.
- (d) Investigative findings.
- (e) Conclusions.
- (f) Recommendations, if any.

(6) A rights investigation may be reopened or reinvestigated by the office if there is new evidence that was not presented at the time of the investigation.