

ALAMEDA COUNTY SHERIFF'S OFFICE DETENTION AND CORRECTIONS POLICY AND PROCEDURE	NUMBER: 13.22	PAGES: 1 of 7
	RELATED ORDERS: ACA 4-ALDF-4D-23, 4D-24, 4D-25, 4D-26, 7D-25, 7D-26 NCCHC Standard J-A-10; 6031 Penal Code 101045 California Health & Safety Code	
	ISSUED DATE: July 8, 2005	
	REVIEW DATE: December 10, 2015	
	REVISION DATE: September 22, 2011	
CHAPTER: Medical and Health Care Services	SUBJECT: Medical Quality Assurance Process for the Detention and Corrections Inmate Health Care System	

- I. **PURPOSE:** To establish policy for providing a medical quality assurance system of inspections and accountability.

- II. **POLICY:** The Alameda County Sheriff's Office (ACSO) understand the need to monitor the quality of health care provided to those in its custody as a necessary step to ensuring the health and welfare of those in its custody. As such the ACSO will facilitate the medical quality assurance review process as it relates to the medical and mental health care provided to inmates at Sheriff's Office Detention and Corrections facilities.

- III. **DEFINITIONS:**
 - A. **ADULT INMATE MEDICAL SERVICES (AIMS) REVIEW PANEL:** A sub-group of volunteer physicians appointed by the Board of Supervisors and belonging to the Alameda-Contra Costa Medical Association who meet quarterly and review the quality of health care provided to inmates at ACSO facilities. The AIMS review panel will include a Psychiatrist whose specific responsibility on the panel will be to review the mental health care provided to inmates at ACSO facilities.

 - B. **CLINICAL MORTALITY REVIEW:** An assessment of the clinical care provided and the circumstances leading up to a death. Its purpose is to identify any areas of patient care or the system's policies and procedures that can be improved.

 - C. **COMPREHENSIVE HEALTH CARE SERVICE PROVIDER:** A medical company hired by the County of Alameda to provide comprehensive health care services to the adult inmate population incarcerated in the ACSO Detention and Corrections facilities.

 - D. **CONTRACT CHART AUDITOR:** A company hired by the ACSO to conduct monthly medical and mental health "Quality Assurance" chart audits.

- E. **CRIMINAL JUSTICE MENTAL HEALTH (CJMH):** A unit provided by Alameda County Behavioral Health Care Services to provide mental health services to inmates in the custody of ACSO.
- F. **QUALITY ASSURANCE MEDICAL CONSULTANT:** A physician licensed by the State of California and hired by the ACSO to conduct chart reviews, facilitate quarterly meetings with the AIMS review panel, assist the ACSO with investigating inmate medical grievances, and conduct other duties assigned to the position of Quality Assurance Medical Consultant.
- G. **PSYCHOLOGICAL AUTOPSY:** A psychological reconstruction conducted by a psychologist or other qualified mental health professional that attempts to reconstruct an individual's life with an emphasis on factors that may have contributed to the individual's death.
- H. **TRIPLE CROWN ACCREDITATION:** The National Sheriff's Association Award and recognition for Sheriff's Offices that have achieved concurrent accreditations by the Commission on Accreditation for Law Enforcement Agencies, The American Correctional Association, and the American Correctional Association Medical Accreditation.

IV. PROCEDURE:

- A. **QUALITY ASSURANCE MEDICAL CONSULTANT:** The physician hired as the Quality Assurance Medical Consultant will:
 - 1. Review the monthly "Quality Assurance" audits of medical care providers and evaluate the responses of the Comprehensive Health Care Service Provider to these audits.
 - 2. Conduct random unannounced visits to the medical service facilities in the jails.
 - 3. Regularly update the ACSO Detention & Corrections (D&C) Administrative Captain via the Contracts Lieutenant on findings, concerns, and recommendations. Meet as necessary with the D&C Administrative Captain and Contracts Lieutenant to provide advice and guidance on quality assurance issues.
 - 4. Provide County Counsel and the ACSO Contracts Lieutenant with copies of confidential and privileged monthly/quarterly written quality assurance reports.
 - 5. Meet with the Sheriff's Executive Management staff as necessary to provide a medical opinion related to the administration of the provider contract.

6. Monitor medical care of women inmates on a monthly basis to confirm compliance with Jones v. Dyer standards adopted by the ACSO.
 7. Review and investigate as necessary prisoner medical grievance claims and advise the ACSO of findings as needed.
 8. Provide third party medical consultation to ACSO on medical issues, as needed.
 9. Convey AIMS review panel concerns, recommendations and advice to the ACSO D & C Administrative Captain via the Contracts Lieutenant for assistance/action in medical provider contract administration.
 10. Provide advice and recommendations to ACSO as related to medical facility licensure, accreditation, treatment protocols, and general medical quality assurance issues as frequently as deemed necessary by ACSO.
 11. Prepare for, attend and help facilitate the AIMS review panel.
 - a. Although the physician will work for the ACSO, he/she may have reporting responsibilities to the Alameda County Board of Supervisors as requested.
 - b. The physician will report to the ACSO before providing any reports to the Board of Supervisors.
 12. Prepare and present a report on the status of health care to the Board of Supervisors, as requested, including both medical and mental health, administered to adult inmates at ACSO facilities.
- B. AIMS REVIEW PANEL: The AIMS review panel physicians are appointed by the Alameda County Board of Supervisors and are responsible for the following:
1. Meet on a quarterly basis and review mental health and general medical charts of adult inmates housed in ACSO jails as a confidential peer review body.
 2. As a result of these quarterly meetings, make recommendations to the Board of Supervisors for improved delivery of health care services, including mental health care issues. The recommendations will be presented by the Quality Assurance Medical Consultant, who will communicate the AIMS recommendations to the Sheriff's Office through its chain of command. Following this meeting, the Board of Supervisors will conduct a closed session briefing on the report. The Quality Assurance Medical Consultant, along with the Sheriff, or designee, will discuss the complete recommendation of the AIMS review panel with the Board of Supervisors. Throughout this process, all parties will cooperate with County Counsel to maintain the report as a privileged document, as necessary and appropriate under law.
 3. Meet at least annually with representatives of the Comprehensive Health Care

Provider and CJMH.

- C. CONTRACT CHART AUDITOR: The company hired as the Contract Chart Auditor will:
1. On a monthly basis, randomly pull and review medical charts from the Comprehensive Health Care Provider that are needed by the AIMS review panel and the Quality Assurance Medical Consultant.
 2. Deliver the information from the medical charts to the Quality Assurance Medical Consultant.
 3. The Contract Chart Auditor cannot take original copies of medical or mental health charts from the institution. Notes and copies of charts can be taken, but only with the prior approval of the Contracts Lieutenant. Any notes or information taken will be stamped and noted by the Contracts Lieutenant prior to removal.
 4. Once chart information has been reviewed, the Contract Chart Auditor will return the copies of charts and notes to the Contracts Lieutenant for filing.
- D. COMPREHENSIVE HEALTH CARE SERVICES PROVIDER: The company hired as the Comprehensive Health Care Provider will:
1. Work with and promptly cooperate fully with the Quality Assurance Medical Consultant, Contract Chart Auditor, and the AIMS review panel.
 2. Designate personnel to attend the AIMS review panel meetings when attendance is requested by the AIMS Panel.
 3. Promptly respond in writing to each of the AIMS review panel recommendations through the Contracts Lieutenant, whether the recommendations are adopted or not.
 4. Implement the recommended changes when appropriate and at the request of the ACSO.
 5. Maintain all ACSO current and future accreditations.
- E. ALAMEDA COUNTY ADMINSTRATOR'S OFFICE will:
1. Assist in facilitating meetings with the AIMS Review Panel.
 2. Designate a person to attend all AIMS review panel meetings.
 3. Help facilitate the Quality Assurance Medical Consultant contract.
 4. Coordinate with the ACSO to keep the Board of Supervisors informed.

5. Submit recommendations from the AIMS Panel to the ACSO, via chain of command, starting with the Contracts Lieutenant.
- F. ALAMEDA COUNTY COUNSEL will review and approve contract issues and provide advice for liability or other legal issues associated with health care services.
- G. ALAMEDA COUNTY SHERIFF'S OFFICE is exclusively responsible for managing all aspects of the Comprehensive Health Care Services Provider contract and has final authority over all items associated with that contract.
1. The ACSO will act as a facilitator ensuring all parties involved in the AIMS review panel process receive the information necessary to fulfill their roles and responsibilities.
 2. An ACSO representative will attend all AIMS review panel meetings.
 3. The ACSO will review all AIMS review panel recommendations and changes with the Comprehensive Health Care Provider or CJMH. ACSO will ensure that responses are provided to the AIMS panel concerning their recommendations.
 4. The ACSO will collect and maintain confidential files on all documentation associated with the AIMS review panel.
 5. The ACSO will work with the County Administrator's Office and County Counsel to facilitate the Quality Assurance Medical Consultant contract.
 6. The ACSO will draft, write and maintain this protocol for Medical Quality Assurance.
 7. The ACSO will provide the Public Health Officer with any pertinent information as it relates to the Public Health Inspection or public health issues.
- H. The Alameda County Board of Supervisors is responsible to advise the Sheriff of their needs and wants related to the medical quality assurance process.
- I. ANNUAL PUBLIC HEALTH INSPECTION: California Health and Safety Code 101045 requires the County Health Officer to conduct an annual inspection of the health and safety conditions of all jails and detention facilities in his/her jurisdiction. The Alameda County Health Officer's annual inspection includes an environmental health inspection of the D & C facilities; a review of our nursing practices and documentation procedures; nutritional quality of meals served, a review of the medical, mental, and dental health care procedures; and a review of our medical charts.
- J. BIENNIAL BOARD OF CORRECTIONS INSPECTION: California Penal Code 6031 requires the California Board of Corrections to conduct biennial inspections of each

local detention facility. The inspections consist of a physical walk-through of each facility; a review of agency written directives; a review of documentation to substantiate that practices are consistent with agency written directives; and interviews with staff to verify their understanding of Titles 15 and 24 of the California Code of Regulations (CCR), applicable agency written directives, and how they actually perform their duties.

- K. AMERICAN CORRECTIONAL ASSOCIATION (ACA) accreditation process is a voluntary system of verification that correctional agencies/facilities comply with national standards promulgated by ACA.
1. Accreditation is originally achieved through a series of reviews, evaluations, audits and hearings. Reaccreditation occurs every three years and follows the same process to ensure compliance.
 2. An ACA audit involves assessments of administration and management, the physical plant, institutional operations and services, and inmate programs. This includes assessing issues and concerns that may affect the quality of life at a facility such as staff training, adequacy of medical services, sanitation, use of segregation and detention, incidents of violence, crowding, offender activity levels, programs, and provisions of basic services that may impact the life, safety and health of inmates and staff.
- L. CLINICAL MORTALITY REVIEW COMMITTEE: A committee comprised of members of the ACSO, the Comprehensive Health Care Provider, Criminal Justice Mental Health, the County Health Officer, and the Quality Assurance Medical Consultant.
1. The purpose of the Clinical Mortality Review Committee is to determine the appropriateness of the clinical care provided and the effectiveness of the facility's policies and procedures relevant to circumstances surrounding an inmate death. Included in the review are deaths, whether natural or otherwise, that occur off site when the facility remains responsible for the inmate.
 2. The committee may identify trends and determine if further study is required. At the conclusion of the review a determination will be made on the following issues:
 - a. Could the medical response at the time of death be improved?
 - b. Was an earlier intervention possible?
 - c. Independent of the cause of death, is there any way to improve patient care?
 3. In the case of an inmate suicide, a psychological autopsy will be part of the Clinical Mortality Review. The psychological autopsy may include the following:
 - a. Reviews of all file information on the inmate
 - b. An examination of the suicide site

- c. A review of interviews with staff, inmates, and family members documented in ACSO reports
4. The Clinical Mortality Review Committee will be convened within 30 days of an inmate death.
5. The Clinical Mortality Review Committee includes a review of the incident and facility procedures used, training received by involved staff, pertinent medical and mental health services or reports involving the inmate, and recommendations, if any, for change in policy, training, physical plant, medical or mental health services, or operational procedures.
6. The following documents will be utilized for this review:
 - a. The Coroner Investigator's Report and Coroner's Autopsy Protocol Report when available
 - b. The inmate's medical records
 - c. The ACSO Inmate Death Review Report
 - d. Any applicable police reports deemed necessary
7. The D&C Contracts Lieutenant will chair this committee and be responsible for:
 - a. Facilitating the meetings
 - b. Obtaining the required reports to conduct the review
 - c. Assisting the Quality Assurance Medical Consultant with briefing the Board of Supervisors on the findings of the Clinical Mortality Review Committee
 - d. Assisting the Quality Assurance Medical Consultant in keeping the Sheriff, the County Administrator's Office, Criminal Justice Mental Health, the Comprehensive Health Care Services Provider and the AIMS Panel regularly apprised of the Committee's work and recommendations