

In January, 2017, the San Diego County Sheriff's Department contracted with the National Commission on Correctional Health Care (NCCHC) to conduct a technical review of our jails' medical and mental health delivery to compare our current model to their national standards. This review culminated in a report to the Sheriff's Department identifying several areas of improvement needing to be addressed to meet the NCCHC standards. We used this report, as well as the NCCHC "Standards for Health Services in Jails" book, to develop an implementation plan to start the process of moving toward gaining accreditation from NCCHC. NCCHC updated and revised their standards in 2018 and we adapted our implementation plan to the new standards. We have worked to steadily enhance our medical and mental health service delivery. Below are the descriptions of the standards and where we are in the implementation process, as of October 14, 2019.

NCCHC STANDARDS

SECTION A – GOVERNANCE AND ADMINISTRATION

1. J-A-01 Access to Care –

Inmates have access to care for their serious medical, dental, and mental health needs.

The Sheriff's Department has always provided access to medical and mental health care. Policy and procedure changes, including the triaging of medical sick call requests and scheduling follow-up appointments, were made to ensure the compliance indicators for this standard are being met. We currently meet all compliance indicators for this standard.

2. J-A-02 Responsible Health Authority –

The responsible health authority (RHA) ensures that the facility maintains a coordinated system for health care delivery.

After further consultation with NCCHC, we have designated the Chief Medical Officer (CMO) as the Responsible Health Authority (RHA) and the individual facility Supervising Registered Nurses (SRN) act as his designee. The policy has been updated to meet the compliance indicators for this standard.

3. J-A-03 Medical Autonomy –

Health care decisions are made by qualified health care professionals for clinical purposes.

The Sheriff's Department met all the compliance indicators for this standard. No further recommendations were provided.

4. J-A-04 Administrative Meetings and Reports –

The facility's health and correctional administrators coordinate the health care delivery system through joint monitoring, planning, and problem resolution.

Each facility conducts a Patient Care Coordinating Committee (PCCC) meeting monthly where statistics are shared and problems solved. In addition, bi-weekly Multi-Disciplinary Group (MDG) meetings are held to share information about patient needs, care, and follow up. Policy and procedure for the standardization of these meetings was written and is in place. We currently meet all compliance indicators for this standard.

5. **J-A-05 Policies and Procedures –**

The responsible health authority (RHA) ensures that health care policies and procedures are developed, documented, and readily available to the staff.

The Medical Services Division is undergoing a complete policy and procedure review process to ensure all required NCCHC standards are covered. The requirement that the policies be site specific will follow the review. The Chief Medical Officer is responsible to review all policy and procedure. This process is ongoing.

6. **J-A-06 Continuous Quality Improvement Program –**

A continuous quality improvement (CQI) program monitors and improves health care delivered in the facility.

The Sheriff's Department has a Quality Improvement Committee that meets quarterly. The committee chairperson is developing a process to comply with all compliance indicators. Policy revisions are being drafted. This process is ongoing.

7. **J-A-07 Privacy of Care –**

Health care encounters and exchanges of information remain private.

The Sheriff's Department meets many of the compliance indicators for this standard. A capital improvement project is slated for the Vista Detention Facility to add private interview space at intake. All other facilities allow for private interview space currently.

8. **J-A-08 Health Records –**

A confidential health record is created and maintained using a standardized format.

The Sheriff's Department met all the compliance indicators for this standard. No further recommendations were provided.

9. **J-A-09 Procedure in the Event of an Inmate Death –**

The responsible health authority conducts a thorough review of all deaths in custody in an effort to improve care and prevent future deaths.

The Sheriff's Department conducts several levels of review following an inmate death. There is a mortality review completed by the Chief Medical Officer, an administrative review at the Patient Care Coordinating Committee meeting, a review by the Critical Incident Review Board, and a clinical suicide report following a completed suicide. Policy was put in place and we currently meet all compliance indicators for this standard.

10. J-A-10 Grievance Process for Health Care Complaints –

The facility protects a patient's right to disagree with or question the health care system.

The Sheriff's Department maintains a robust grievance process that is documented in Policy and Procedure. This policy meets all the compliance indicators to meet the NCCCHC standard.

SECTION B – HEALTH PROMOTION, SAFETY, AND DISEASE PREVENTION

11. J-B-01 Health Lifestyle Promotion –

Health care policies, procedures, and practices emphasize health promotion, wellness, and recovery.

The Sheriff's Department meets the compliance indicators for this standard.

12. J-B-02 Infectious Disease Prevention and Control –

There is a comprehensive institutional program that includes surveillance, prevention, and control of communicable disease.

The Sheriff's Department employs an Infection Control Nurse (ICN) who works under the direction of our Managed Care Unit. The ICN is a member of the quality assurance committee and participates in all issues related to infection control. The ICN is currently finalizing the Department's Infection Control Plan that will be reviewed by the Chief Medical Officer. This process is ongoing.

13. J-B-03 Clinical Preventive Services –

Inmates are provided with clinical preventive services as medically indicated.

The Sheriff's Department meets many of the compliance indicators for this standard. The completion of this process is dependent on the development of the preventative services program by the Chief Medical Officer, policy and procedure changes and the application of resources.

14. J-B-04 Medical Surveillance of Inmate Workers –

The health and safety of the inmate worker populations are protected.

Occupational injury or exposure of inmate workers was added to the monthly Patient Coordination Care Committee agenda. Documentation of injuries is being entered into the health record. The Quality Assurance committee will review and discuss steps in prevention and education for the inmate worker program. The Sheriff's Department is revamping its inmate worker orientation and training to include education on the prevention of illness and injury due to the health hazards they may experience while performing their duties. This committee is currently in the process of completing the training and education for the inmate worker population. This process is ongoing.

15. J-B-05 Suicide Prevention and Intervention –

Suicides are prevented when possible by implementing prevention efforts and intervention.

The Sheriff's Department has been diligently working toward improving our prevention and intervention efforts. The department has created and implemented curriculum on suicide detection and prevention which is required training for all sworn, professional and contracted staff to attend. The department revised policies to reflect national standards and added specific questions in our receiving screening to flag inmates with the potential for suicidal ideations or in need of acute mental health treatment. The department is compliant with the indicators in this standard.

16. J-B-06 Contraception –

Contraception is made available as clinically indicated.

A procedure has been developed for continuing birth control and providing emergency contraceptives at our female facilities. Policy for this standard has been drafted and once completed will satisfy full compliance with this standard.

17. J-B-07 Communication on Patient's Health Needs –

Communication occurs between the facility administration and treating health staff regarding inmates' significant health needs that must be considered in classification decisions in order to preserve the health and safety of that inmate, other inmates, or staff.

The Sheriff's Department met all the compliance indicators for this standard. No further recommendations were provided.

18. J-B-08 Patient Safety –

Facility staff implement systems to reduce risk and prevent harm to patients.

The Sheriff's Department's Medical Services Division went through a complete change in medication dispensing in the effort to prevent adverse clinical events. The division started a

Process Improvement Team to discuss improving systems and maintaining a safe environment for patients.

19. J-B-09 Staff Safety –

Facility staff implement measures to ensure a safe environment.

The Sheriff's Department has always been dedicated to providing a safe and healthy environment for its staff. The department continually evaluates methods to improve staff safety. A recent example of this is improving radio communication coverage for medical and mental health staff. This aids in their overall awareness of facility operations as well as improves communication and response in the event of an emergency. The department meets all compliance indicators for this standard.

SECTION C – PERSONNEL AND TRAINING

20. J-C-01 Credentials –

The facility's qualified health care professionals are legally eligible to perform their clinical duties.

The Sheriff's Department met all the compliance indicators for this standard. No further recommendations were provided.

21. J-C-02 Clinical Performance Enhancement –

Individuals delivering patient care are reviewed through a clinical performance enhancement process.

A peer review process was implemented in 2018 for Sheriff's nursing staff. Our Chief Medical Officer is in the process of implementing a peer review process for both our Medical and Psychiatric contract providers. This process is ongoing.

22. J-C-03 Professional Development –

The facility's qualified health care professionals maintain current clinical knowledge and skills.

The Sheriff's Department met all the compliance indicators for this standard. No further recommendations were provided.

23. J-C-04 Health Training for correctional Officers –

Correctional officers are trained to recognize the need to refer an inmate to a qualified health care professional.

Training for sworn staff was developed and incorporated in the Detention Services Bureau annual training plan. Health related training for all sworn staff that works with inmates is required every two years. The department meets all compliance indicators for this standard.

24. J-C-05 Medication Administration Training –

Personnel who administer or deliver prescription medication are appropriately trained.

New nursing staff members receive an orientation to medication administration during their new employee orientation. They are taught how to navigate the electronic health record for this function and are introduced to policies surrounding medication administration. The orientation to medication administration continues at the facility level. The department meets all compliance indicators for this standard.

25. J-C-06 Inmate Workers –

Health services are provided by health staff and not inmate workers.

The Sheriff's Department met all the compliance indicators for this standard. No further recommendations were provided.

26. J-C-07 Staffing –

The responsible health authority (RHA) ensures sufficient numbers and types of health staff to care for the inmate population.

The Sheriff's Department conducted a staffing study and workload analysis which was submitted for approval.

27. J-C-08 Health Care Liaison –

Health care services continue to be coordinated via a health care liaison when qualified health care professionals are not available for an extended period of time.

The Sheriff's Department maintains full time staffing of health care professionals, therefore this standard is not applicable.

28. J-C-09 Orientation for Health Staff –

Health staff are properly acclimated to work in the correctional environment and understand their roles and responsibilities.

All new health staff receives a basic orientation from the Medical Services Training Unit prior to their assignment in a detention facility related to the overall Medical Services Division, safety & security and electronic health record. In depth training continues at the facility level covering all functional areas based on job classification. The department meets all compliance indicators for this standard.

SECTION D – ANCILLARY HEALTH CARE SERVICES

29. J-D-01 Pharmaceutical Operations –

Pharmaceutical operations meet the needs of the facility and conform to legal requirements.

The Sheriff's Department's contract supplier of medication complies with the NCHC standards for the administration of medications. Medications are packaged as patient specific in unit dose which assists with inventory and control and minimizes potential for errors. The department is continuing to review our processes to meet all compliance indicators for this standard.

30. J-D-02 Medication Services-

Medications are provided in a timely, safe, and sufficient manner.

The Medical Services Division policy is currently being revised which identifies expected timeframes from ordering to administration of medication. Contingency plans are also in place for time sensitive medication ordering. Notifications are currently being made to the prescriber of any impending expiration of orders. The department already had established policies regarding all prescription medications administered or delivered as well as procedures to ensure continuity of medication services. This process is ongoing.

31. J-D-03 Clinic Space, Equipment, and Supplies-

Sufficient and suitable space, supplies, and equipment are available for the facility's medical, dental, and mental health services.

The Sheriff's Department met all compliance indicators for this standard. No further recommendations were provided.

32. J-D-04 On-Site Diagnostic Services-

The facility provides the necessary on-site diagnostic services for patient care.

The Medical Services Division requires documentation that contracted on-site diagnostic services are certified and licensed to provide that service. The division created procedure and calibration manuals for all equipment to include protocols for the calibration of testing devices to ensure accuracy. The Sheriff's Department maintains a supply of diagnostic supplies such as, multiple-test dipstick urinalysis, finger-stick blood glucose tests, peak flow meters and

pregnancy test kits. Policy for this standard is currently being drafted and once completed will satisfy full compliance with this standard.

33. **J-D-05 Medical Diets-**

Medical diets are provided that enhance patients' health.

The Sheriff's Department met all compliance indicators for this standard. No further recommendations were provided.

34. **J-D-06 Patient Escort-**

The facility staff ensure that patients can meet scheduled health care appointments.

The Sheriff's Department met all compliance indicators for this standard. No further recommendations were provided.

35. **J-D-07 Emergency Services and Response Plan –**

Planning for emergency health care ensures that all staff are prepared to effectively respond during emergencies.

The Sheriff's Department met all compliance indicators for this standard. No further recommendations were provided.

36. **J-D-08 Hospital and Specialty Care –**

Hospitalization and specialty care are available to patients who need these services.

The Sheriff's Department met all compliance indicators for this standard. No further recommendations were provided.

SECTION E- PATIENT CARE AND TREATMENT

37. **J-E-01 Information on Health Services-**

Upon arrival at the facility, inmates are informed of the availability of health care services and how to access them.

The Sheriff's Department shows an inmate orientation video once a day to ensure inmates are informed of the facilities health care services and how to access these services. Signage and inmate handbooks are being finalized to allow for additional information on resources and how to access them. This process is ongoing.

38. J-E-02 Receiving Screening-

Screening is performed on all inmates upon arrival at the intake facility to ensure that emergent and urgent health needs are met.

The Sheriff's Department has always utilized a comprehensive medical and mental health intake screening process. The implementation of the new electronic health record now allows for more efficient screening which complies with this standard.

39. J-E-03 Transfer Screening-

Inmates who are transferred within the same correctional system continue to receive appropriate health services.

Medical staff reviews each transferred inmate's health record or summary to ensure continuity of care and medications. The electronic health record assists with tracking and allows compliance with this standard.

40. J-E-04 Initial Health Assessment-

Inmates receive initial health assessments.

This standard will require expanded contractual staffing to ensure a full clinical follow up can be completed on each inmate within 14 days of their initial booking. This process is ongoing.

41. J-E-05 Mental Health Screening and Evaluation-

Mental health screening is performed to ensure that urgent mental health needs are met.

A comprehensive mental health screening is conducted during receiving screening. Inmates identified with mental health needs are referred to a qualified mental health professional for further evaluation. Patients who require acute mental health services beyond those available on-site are transferred to an appropriate facility. This process is ongoing.

42. J-E-06 Oral Care-

Inmates' dental needs are addressed.

Oral care is currently provided by a licensed dentist to inmates when clinically indicated. The department is working toward screening every inmate within 14 days of admission as well as an oral examination within 12 months of admission into custody. Both of these standards require the addition of contractual staffing/hours. This process is ongoing.

43. J-E-07 Nonemergency Health care Requests and Services-

Inmates' nonemergent health care needs are met.

All inmates, regardless of housing assignment are given the opportunity to submit oral and written health care requests on a daily basis. Nurses are responsible for reviewing inmate requests. They triage and schedule follow up appointments based on acuity level. The department is working toward a process to allow a face-to-face encounter for the health care request within 24 hours of receipt by medical staff. This will be implemented as we continue to increase our staffing levels. This process is ongoing.

44. J-E-08 Nursing Assessment Protocols and Procedures-

Nursing assessment protocols and procedures are appropriate to the level of competency and preparation of the nursing personnel and comply with the relevant state practice acts.

Nursing assessment protocols and procedures were revised to comply with this standard. Protocols and procedures are being reviewed annually based on the level of care provided in the facilities. All protocols and procedures are accessible to all nursing staff. Training is tracked for compliance and there is retraining when protocols or procedures are revised. All compliance indicators for the standard have been met.

45. J-E-09 Continuity, Coordination, and Quality of Care During Incarceration-

Patient medical, dental, and mental health care is coordinated and monitored from admission to discharge.

With the implementation of the electronic health record, monitoring of patient care is more comprehensive. The Quality Assurance Committee will oversee a multi-disciplinary approach to patient care. The new electronic health record assists with compliance and tracking. Primary Care nursing will enhance the timeliness of care and familiarize staff of patient needs in the housing units. This process is ongoing.

46. J-E-10 Discharge Planning-

Discharge planning is provided for inmates with serious health needs whose release is imminent.

The Sheriff's Department currently provides discharge prescriptions for those inmates who are prescribed psychotropic medications. The new electronic health record will assist with compliance and tracking of those with serious health needs and prepare staff to educate and supply the necessary resources and prescriptions upon their release. Protocols and policies need to be revised for compliance. This process is ongoing.

SECTION F- SPECIAL NEEDS AND SERVICES

47. J-F-01 Patients With Chronic Disease and Other Special Needs-

Patients with chronic disease, other significant health conditions, and disabilities receive ongoing multidisciplinary care aligned with evidence-based standards.

The Sheriff's Department currently has clinical protocols in place for the identification and management of chronic diseases or other special needs. The Chief Medical Officer (CMO) is in the process of developing a program according to the standard.

48. J-F-02 Infirmery-Level Care-

Infirmery-level care, when provided, is appropriate to meet the health care needs of patients.

Infirmery-level care is care provided to patients with an illness or diagnosis that requires daily monitoring, medication and/or therapy, or assistance with activities of daily living at a level needing nursing intervention. The Medical Services Division is working toward developing an acuity scale and an admission and discharge procedure in the electronic health record. Protocols and policies need to be revised for compliance.

49. J-F-03 Mental Health Services-

Mental health services are available for all inmates who require them.

The department ensures that a comprehensive mental health screening is conducted upon admission into custody. Those in need of mental health services are referred to a qualified mental health provider for an assessment. Inmates in need of mental health services are addressed on-site or referred to an appropriate alternative facility. The department currently has 7 day QMHP coverage at our four main facilities and is working to recruit clinicians to provide 24 hour coverage. The department is currently recruiting for a Chief Mental Health Officer and has requested approval to increase the number of our current authorized positions.

50. J-F-04 Medically Supervised Withdrawal and Treatment-

Inmates who are intoxicated or undergoing withdrawal are appropriately managed and treated.

The Sheriff's Department currently has protocols in place for managing inmates under the influence of or undergoing withdrawal from alcohol and other substances. The department has acquired an evidence-based assessment tool in treating inmates undergoing withdrawal which will be implemented in the near future. The department is currently receiving training on how to effectively implement a Medication Assistance Treatment (MAT) program in our facilities.

51. J-F-05 Counseling and Care of the Pregnant Inmate-

Pregnant inmates are given comprehensive counseling and care in accordance with national standards and their expresses desires regarding their pregnancy.

The Sheriff's Department met all compliance indicators for this standard. No further recommendations were provided.

52. J-F-06 Response to Sexual Abuse-

Facility staff ensure that victims of sexual abuse receive appropriate intervention.

The Sheriff's Department met all compliance indicators for this standard. No further recommendations were provided.

53. J-F-07 Care for the Terminally Ill-

The facility addresses the needs of terminally ill inmates, including protecting their rights regarding end of life decisions.

The Medical Services Division made updates to nursing protocols to provide guidance and instruct procedures to follow when a terminally ill inmate is identified. The department is compliant with this standard.

SECTION G- MEDICAL LEGAL ISSUES

54. J-G-01 Restraint and Seclusion-

The responsible health authority ensures that when restraints are used for clinical or custody reasons, the inmate is not harmed by the intervention.

Medical Services Division policy and procedures were updated for compliance with this standard.

55. J-G-02 Segregated Inmates-

Any practice of segregation should not adversely affect an inmate's health.

Detentions and Medical policy and procedures are being updated to reflect practices and compliance with this standard.

56. J-G-03 Emergency Psychotropic Medication-

Health staff follow policies developed for the emergency use of forces psychotropic medications as governed by the laws applicable in the jurisdiction.

The Sheriff' Department's policy and procedures are currently in compliance with the laws of the state. Protocols on medications administered and policies to comply with this standard are under revision.

57. J-G-04 Therapeutic Relationship, Forensic Information, and Disciplinary Actions-

Health staff protect the integrity of the therapeutic partnership with their patients.

The Sheriff's department was already in compliance with this standard. No further recommendations were provided.

58. J-G-05 Informed Consent and Right to Refuse

Inmates have the right to make informed decisions regarding health care, including the right to refuse care.

The Sheriff's department was already in compliance with this standard. No further recommendations were provided.

59. J-G-06 Medical and Other Research

Biomedical, behavioral, or other research using inmates as subjects is consistent with established ethical, medical, legal, and regulatory standards for human research.

Medical Services Division policy and procedures were updated for compliance with this standard.