

April 6, 2009

Oklahoma Commission on Children and Youth
Office of Juvenile System Oversight
ATTN: Jenifer K. Cooks, LPC
500 N. Broadway Ave. Suite 300
Oklahoma City, OK 73102-6200

RE: Second Biannual Visit, 2008

Dear Ms. Cooks:

This is our agency response addressing the violations and the OJSO recommendations noted in the December, 2008 visit.

Finding:

1. Four of the five employees interviewed were unable to explain the grievance process. J.D. McCarty Center policy, 1035.17, Patient Rights/Grievance.
 - a. New hire orientation was updated on the grievance process to include clear and concise guidance on the process and update outcome testing to better ensure the staff's understanding of our policy and procedures.
 - b. We will begin to conduct bi-annual employee update training on the grievance process to ensure that staff not only has acquired, but also retains an understanding of our processes and to provide updates when changes are made. (2nd and 4th quarters)
 - c. Patient Rights/Grievance contact persons and extensions will be posted in all group homes and in the main building on the job postings bulletin board in the admin wing.

2. Three of the five employees interviewed stated the facility did not allow for the use of time out. J.D. McCarty Center policy 3035.7, Use of time Out.
 - a. New hire orientation was updated on the use of time out to include clear and concise guidance on the procedures consistent with facility policy and CMS guidelines. Provide outcome testing to better ensure the staff's understanding of our policy and procedures.

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- b. We will begin to conduct bi-annual employee update training on the use of the time out process to ensure that staff not only has acquired, but also retains an understanding of our processes and to provide updates when changes are made. (1st and 3rd quarters)

Thank you for your assistance in this matter. If you have any questions concerning this response, please contact our agency at (405) 307-2800.

Sincerely,

Curtis A. Peters
Director