

OFFICE OF THE MONITOR FOR THE WELSCH CONSENT DECREE

Legal Education Center, Room 106
40 North Milton Street
Saint Paul, Minnesota 55104

Telephone: (612) 224-3647

MEMORANDUM

January 3, 1984

TO: Margaret Sandberg, Assistant Commissioner
Mental Health Bureau, DPW

FROM: Lyle D. Wray, Ph.D., Court Monitor *Lyle D. Wray*

SUBJECT: Statewide and Community Compliance Issues

Almost a year ago it was agreed that I would work with state hospitals to narrow down the number of issues for consideration at the statewide level. While it appears that there will continue to be important issues brought forth at state hospitals, it is my judgment that a state level response is indicated for a number of issues.

The enclosed listing of 79 issues which are currently unresolved indicates actions requested to resolve each of these issues. At your convenience, I would ask that we establish timelines for actions that you agree to take and clarify your views on actions that you choose not to take.

LDW:tk

Attachment

cc. F. Giberson (with attachment)
D. Huskins (" ")
L. Granquist (" ")

Chrono 84-001

OFFICE OF THE COURT MONITOR FOR THE WELSH CONSENT DECREE

STATEWIDE AND COMMUNITY COMPLIANCE ISSUES

JANUARY, 1984

ISSUES RAISED:	184
ISSUES RESOLVED:	105
ISSUES OUTSTANDING:	79

OUTSTANDING STATEWIDE AND COMMUNITY COMMUNITY COMPLIANCE ISSUES = 79

1 (Paragraph 89 F) <i>Boek</i>	2 (Paragraph 89 B)
4 (Paragraph 103) <i>Boek</i>	6 (Paragraph 89 F)
7 (Paragraph 35)	10 (Paragraph 60) <i>Beck</i>
19 (Paragraph 16) <i>MR</i>	20 (Paragraph 26, 89) <i>Beck's</i>
22 (Paragraph 60) <i>Beck</i>	23 (Paragraph 61) <i>Beck's</i>
24 (Paragraph 63) <i>Beck</i>	25 (Paragraph 64) <i>Beck</i>
27 (Paragraph 67 02B) <i>Beck</i>	28 (Paragraph 24) <i>MR</i>
29 (Paragraph 34, 35) <i>Bunge</i>	39 (Paragraph 22) <i>MR</i>
40 (Paragraph 21) <i>MR</i>	41 (Paragraph 81) <i>MR</i>
<i>SS</i> 42 (Paragraph 88, 89 B)	43 (Paragraph 89 F) <i>MR</i>
45 (Paragraph 22 E) <i>MRPD's</i>	47 (Paragraph 21) <i>SS & MR w/SH</i>
49 (Paragraph 89 B) <i>SS</i>	50 (Paragraph 24, 26) <i>MR - Kudla</i>
55 (Paragraph 68 B) <i>MRPD's</i>	61 (Paragraph 81) <i>MR</i>
65 (Paragraph 63)	67 (Paragraph 22 E, 23)
70 (Paragraph 67 02A)	72 (Paragraph 70, 71)
73 (Paragraph 16) <i>MRPD</i>	74 (Paragraph 16) <i>MRPD</i>
79 (Paragraph 30)	85 (Paragraph 63, 64)
86 (Paragraph 28-33)	87 (Paragraph 16)
90 (Paragraph 26)	100 (Paragraph 64)
102 (Paragraph 89)	105 (Paragraph 24) <i>SS</i>
106 (Paragraph 26, 102) <i>MRPD</i>	107 (Paragraph 24, 26) <i>MRPD</i>
108 (Paragraph 88, 90)	109 (Paragraph 30)
118 (Paragraph 17-20) <i>Done</i>	124 (Paragraph 17-20)
126 (Paragraph 17-20)	129 (Paragraph 17-20)
131 (Paragraph 17-20)	137 (Paragraph 17-20)
138 (Paragraph 17-20)	139 (Paragraph 63)

(CONTINUED)

145 (Paragraph 26)

149 (Paragraph 17-20)

151 (Paragraph 22 E)

162 (Paragraph 17-20)

166 (Paragraph 24, 26)

168 (Paragraph 26) *Ardo*

170 (Paragraph 24)

172 (Paragraph 26)

174 (Paragraph 24, 26)

176 (Paragraph 24, 26)

178 (Paragraph 22E)

180 (Paragraph 16)

182 (Paragraph 23)

184 (Paragraph 23)

148 (Paragraph 24)

150 (Paragraph 22 E) *SS + MR*

154 (Paragraph 17-20)

164 (Paragraph 17-20)

167 (Paragraph 17-20)

169 (Paragraph 26)

171 (Paragraph 24)

173 (Paragraph 22 E)

175 (Paragraph 24, 26)

177 (Paragraph 24)

179 (Paragraph 16, RD 5B)

181 (Paragraph 24)

183 (Paragraph 23)

OUTSTANDING STATEWIDE AND COMMUNITY COMPLIANCE ISSUES

ISSUE 1 (PARAGRAPH 89 F) DPW LEGISLATIVE PROPOSALS DO NOT DEAL WITH DISINCENTIVES.

Source: Plaintiff/A. Noot 10/22/80; 1/14/81 letter plaintiff to A. Noot.

Action Taken: 95E Notice 1/23/81. Hearing 3/13/81; Hearing Findings, Court Hearing, Court Order 1/13/82.

Action Requested: DPW analysis of present disincentives (see T. Chapel June 1983 paper) and suggest timeline for proposal to remove remaining disincentives.

ISSUE 2 (PARAGRAPH 89 B) DPW LEGISLATIVE PROPOSALS DO NOT MEET ADDITIONAL DAC NEED FOR PARAGRAPHS 22, 24, 26.

Source: Plaintiff/A. Noot 10/22/80.

Action Taken: 95E Notice 1/23/81. Hearing 3/13/81; Court Order 1/13/82.

Action Requested: DPW statement of actions taken to comply with U.S. District Court Order of January 13, 1982 regarding DAC and DAC monitoring.

ISSUE 4 (PARAGRAPH 103) ALLEGED COMPLIANCE WITH EXECUTIVE ORDER INTERFERING WITH CONSENT DECREE COMPLIANCE.

Source: Plaintiff/monitor 10/31/80.

Action Taken: March 13, 1981 hearing.

Action Requested: Current statement from DPW clarifying position on paragraph 103.

ISSUE 6 (PARAGRAPH 89 F) ALLEGED FAILURE TO DEAL WITH
DISPROPORTIONATE SHARE OF DAC SERVICES. SEE ISSUE #1.

Source: Plaintiff/A. Noot 11/5/80.

Action Taken: March 13, 1981 monitor hearing #1, Court Order
1/13/82.

Action Requested: DFW analysis of present disincentives (see T.
Chapel June 1983 paper) and suggest timeline for proposal to
remove remaining disincentives.

ISSUE 7 (PARAGRAPH 35) ALLEGED FAILURE TO PROVIDE PROPOSAL ON
NUMBER OF LICENSORS NEEDED FOR ICF-MR FACILITIES.

Source: Plaintiff/A. Noot 11/5/80; Plaintiff letter 11/82.

Action Requested by Plaintiff: Monitor evaluation of numbers of
licensors needed to effectively perform assigned tasks.

Action Taken: Notice of non-compliance issued 11/18/82; informal
conference held 12/9/82; plan received 1/15/83.

Action Requested: DFW indicate plans to address outstanding
notice of non-compliance in terms of licensor numbers, training
and activity with timeline for actions.

ISSUE 10 (PARAGRAPH 60) ALLEGED VIOLATION OF STAFF TRAINING
REQUIREMENT DUE TO BUDGET CUTS.

Source: Plaintiff/A. Wrobel 11/5/80.

Action Required: Monitor review of staff training budget trends.

Action Requested: DFW review staff training expenditures in
state hospitals from 1980 to present to determine trend and take
actions as indicated to meet Paragraph 60.

ISSUE 19 (PARAGRAPH 16) ADMISSION OF THREE PERSONS TO MOOSE LAKE
STATE HOSPITAL FOR BEHAVIOR PROBLEMS.

Source: Monitor/DPW (Wrobel) letter 1/30/81.

Action Requested: DPW as part of on-going review of admission
criteria analyze admissions from community and clarify
expectation of community providers and counties in making
vigorous attempts to use community and other resources to
maintain placements (see Flick v. Noot for sample language) and
indicate resources available to assist (TAP, state hospitals).

ISSUE 20 (PARAGRAPH 26, B9 B, F) ALLEGED FAILURE TO PROVIDE FUNDS
FOR COMMUNITY BASED SERVICE DEVELOPMENT.

Source: Plaintiff/monitor 2/9/81.

Action Taken: March 13, 1981 Monitor Hearing, Court Order
1/23/82.

Action Requested: DPW statement of actions taken to comply with
U.S. District Court Order of January 13, 1982 regarding DAC and
DAC monitoring.

ISSUE 22 (PARAGRAPH 60) POSSIBLE VIOLATION OF FUNDING NECESSARY
FOR INSERVICE TRAINING IN BUDGET PROPOSAL.

Source: Plaintiff letter 2/9/81.

Action Requested: DPW review staff training expenditures in
state hospitals from 1980 to present to determine trend and take
actions as indicated to meet Paragraph 60.

ISSUE 23 (PARAGRAPH 61) POSSIBLE VIOLATION OF CONSULTANT SERVICES
FUNDING LEVEL IN BUDGET PROPOSAL.

Source: Plaintiff letter 2/9/81.

Action Requested: DPW review consultant expenditure trends since
1980 in state hospitals to determine trends and take actions as
indicated to meet Paragraph 61.

ISSUE 24 (PARAGRAPH 63) POSSIBLE VIOLATION OF PROVISION OF
INDIVIDUAL HABILITATION PROGRAMS IMPLIED IN BUDGET PROPOSAL.

Source: Plaintiff letter 2/9/81.

Action Requested: DPW review consultant expenditure trends since
1980 in state hospitals to determine trends and take actions as
indicated to meet Paragraph 61.

ISSUE 25 (PARAGRAPH 64) POSSIBLE VIOLATION OF PROVISION OF
INDIVIDUALLY ADAPTED WHEELCHAIRS TO CLASS MEMBERS IN BUDGET
PROPOSAL.

Source: Plaintiff letter 2/9/81.

Action Taken: Request to DPW to respond to four plaintiff
concerns on wheelchairs sent 3/82.

Action Requested: DPW statement as to whether budget requests
will include funds for all adapted wheelchairs deemed needed by
teams.

ISSUE 27 (PARAGRAPH 67 D2B) POSSIBLE VIOLATION OF OBLIGATION TO
PROVIDE INTENSIVE BEHAVIOR MANAGEMENT PROGRAMS DUE TO BUDGET
PROPOSAL.

Source: Plaintiff letter 2/9/81.

Action Requested: DPW request state hospitals to have external
consultant review of persons subjected to prolonged restraint and
separation following a specified period of unsuccessful efforts
to manage behavior in question.

ISSUE 28 (PARAGRAPH 24) POSSIBLE FAILURE TO PROVIDE FOR
DEVELOPMENT OF ICF-MR FACILITIES FOR CLASS MEMBERS IN BUDGET
PROPOSALS.

Source: Plaintiff letter 2/9/81.

Action Requested: In light of ICF/MR moratorium and initiation
of waived services, DPW statement of plan to monitor possible slow
down in community placement and corrective actions.

ISSUE 29 (PARAGRAPH 34, 35) INSUFFICIENT FUNDS FOR LICENSOR
FUNCTIONING AND TRAINING IN BUDGET PROPOSAL.

Source: Plaintiff letter 2/9/81.

Action Requested by Plaintiff: Stress compliance problems posed
by a failure to ensure an effective licensing arm at the state
level. See also issue 7.

Action Taken: Notice of non-compliance issued 11/18/82; informal
conference held 12/9/82; plan received 1/15/83.

Action Requested: DFW indicate plans to address outstanding
notice of non-compliance in terms of licensor numbers, training
and activity with timeline for actions.

ISSUE 39 (PARAGRAPH 22) DISCHARGES AGAINST TEAM DECISION BY
COUNTY (WILLMAR).

Source: State Hospital MR Program Directors Meeting 3/4/81.

Action Requested: Notification of placements against team
decision; DFW policy statement clarifying method for dealing with
serious disagreements within teams on placement or program
indicating role of county, CEO of state hospital and team.

ISSUE 40 (PARAGRAPH 21) ANNUAL ASSESSMENT OF COMMUNITY SERVICE
NEEDS.

Source: State Hospital MR Program Directors Meeting 3/4/81.

Action Requested: DFW have Technical Assistance staff sample
community placement service needs plans and offer technical
assistance in re-writing service plans in light of waived
services.

ISSUE 41 (PARAGRAPH B1) MINIMIZATION OF PSYCHOTROPIC MEDICATIONS
- CAMBRIDGE STATE HOSPITAL.

Source: Plaintiff letter 3/6/81.

Action Requested by Plaintiff: Consider whether to extend drug
order to Cambridge State Hospital.

Action Taken: Plaintiff letter 4/22/81. DPW/plaintiff letter 10/4/81 - will not agree to stipulate to extension. Plaintiff letter 3/4/82 - open to 12/31/82. See issue 61. Plaintiff request 12/23/82.

Action Requested: DPW response to consultant report due in early 1984 on medication minimization protocol at Cambridge State Hospital.

ISSUE 42 (PARAGRAPH 88, 89 B) MONITORING OF EXPENDITURE LEVELS FOR SERVICES AT COUNTY LEVEL BEFORE AND AFTER CSSA.

Source: Monitor/DPW (Wrobel) 3/10/81.

Action Taken: DPW/monitor meeting 3/17/81 question of adequacy of DAC monitoring under Minn. Stat. 252.21. CSSA monitoring reports by Connie Cobb, Tony Shoshtak (297-2192). Court Order 1/13/82.

Action Requested: DPW statement on DAC expenditure trends 1980-83 and monitoring plans.

ISSUE 43 (PARAGRAPH 89 F) FINANCIAL INCENTIVE FOR STATE HOSPITAL OVER COMMUNITY PLACEMENT.

Source: Monitor/DPW (Wrobel) 3/10/81.

Action Taken: 3/13/81 hearing before monitor; awaits motion to endorse recommendation for new proposals to Legislature. Court Order 1/13/82. See issues 1, 17.

Action Requested: DPW analysis of present disincentives (see T. Chapel June 1983 paper) and suggest timeline for proposal to remove remaining disincentives.

ISSUE 45 (PARAGRAPH 22 E) COMMUNITY PLACEMENT EVALUATIONS NOT RESPONSIVE IN CONTENT TO REQUIREMENTS.

Source: Monitor/DPW (Wrobel) 3/10/81.

Action Taken: (1) Letter Monitor/Commissioner DPW 2/19/81 (81-8): Regarding evaluations overdue beyond 90 days; request steps taken or planned to remedy situation. (2)

DPW/Monitor Meeting 3/17/81: Instructions will be sent to state hospitals on doing IHP at discharge plan: 60-day followup format will relate ISP, IHP to what is delivered and comment on gaps; a

form will be drafted to address this need. (3)
DPW/Monitor Meeting 3/30/81: Decision by DPW coordinating committee to put out interim set of instructions on 60-day followup very soon. Instructions are to go to Chief Executive Officers. (4) DPW/Monitor Meeting 4/7/81: Monitor has written Commissioner Noot outlining 15 evaluations over 90 days overdue. (5) Letter Monitor/Commissioner DPW 4/17/81 (81-53): Fifteen overdue placement evaluations; Paragraph 95 provisions. (6) Letter Wrobel/Monitor 4/23/81: Outlined responsibilities for ensuring that evaluations are completed on a timely basis. (7) Letter Kohnstamm/Monitor 4/24/81: Reiterated Department responses and steps. (8) Memo D. Boland/CEOs 5/8/81: Outlines proceeding for ensuring evaluations by the 90th day are completed for each placement. (9) Monitor/Wrobel letter 5/12/81: Acknowledged receipt of 8 evaluations overdue 90 days or more with 5 outstanding at MLC. (10) DPW/Monitor meeting 5/20/81: Instructional bulletin has gone out on evaluations; counties should be providing adequate evaluations. MR Division is to review a format for ensuring adequate coverage in the review of appropriateness of community placement. (11) ,
DPW/Monitor meeting 11/2/81: Department Bulletin #81-53 responds to identify responsibilities on late evaluations. Monitor will provide format to state hospital program directors and counties with below par evaluations on a routine basis. Current status: pending.

Action Requested: DPW establish criteria for discharge plans and community placement evaluations for use by state hospitals and counties by February, 1984.

ISSUE 47 (PARAGRAPH 21) USE OF ANNUAL ASSESSMENTS OF STATE HOSPITAL RESIDENTS BY COUNTIES IN PLANNING.

Source: Monitor/DPW (Wrobel) 3/10/81.

Action Taken: (1) DPW/Monitor meeting 3/17/81: County use of annual assessments to be covered in instructional bulletin on MDPS - will be reiterated. Department plan is to develop detailed Social Service Manual material on planning of services and case management in April and schedule regional workshops in June. Workshops will be conducted by the MR Division staff including the TAP group. Dr. Wray will be asked to review the manual prior to distribution. (2) Monitor/Commissioner letter 5/18/81 (Chrono 81-89): Request description of steps taken to comply with Paragraph 21. (3) DPW/Monitor meeting 5/20/81: Monitor has written to Commissioner Noot requesting a description of steps taken to comply with Paragraph 21 in use of assessments by counties and central office. (4) Letter Commissioner/Monitor 5/27/81: Outline of steps pursuant to Paragraph 21. (5) DPW/Monitor Meeting 11/2/81: Monitor impression not happening in manner specified in 5/27/81 letter. Will raise on factual basis as issue of compliance. TAP

staff to look into it; possible training topic for counties in planning. (6) Letter copy Bock to Monitor 8/13/82: Reporting form for annual assessments. (7) Letter Monitor to Bock 8/19/82: Annual assessments for planning.

Action Requested: DPW review use of annual assessments of community placement needs of state hospitals by counties with suggestions on integration into CSSA plans; or DPW agree to external consultant to perform review.

ISSUE 49 (PARAGRAPH 89 B) FUNDING LEVELS FOR DEVELOPMENTAL ACHIEVEMENT CENTER SERVICES.

Source: Monitor/DPW Meeting 3/30/81.

Action Taken: March 13, 1981 Court Monitor hearing and recommendations; subsequent Court Order 1/13/82.

Action Requested: DPW statement on DAC expenditure trends 1980-83 and monitoring plans.

ISSUE 50 (PARAGRAPH 24, 26) APPROPRIATENESS OF IN-HOME DAY PROGRAM.

Source: Monitor/DPW meeting 3/30/81.

Action Requested: DPW policy statement on criteria to be used by teams for considering appropriateness of in-home day program for class members.

ISSUE 55 (PARAGRAPH 68 B) BEHAVIOR MANAGEMENT PROGRAMS EMPLOYING SEPARATION REQUIRE DOCUMENTATION OF WITHDRAWAL FROM POSITIVE REINFORCEMENT.

Source: Plaintiff letter 4/10/81.

Action Taken: Monitor request for proposals sent to each state hospital; working with each state hospital using separation to install documentation systems.

Action Requested: DPW meet with plaintiff counsel and monitor to arrive at agreement on documentation of positiveness of class member environment.

ISSUE 61 (PARAGRAPH 81) EXTENSION OF PSYCHOTROPIC MEDICATION
MINIMIZATION TO CAMBRIDGE STATE HOSPITAL.

Source: DPW (Kohnstamm)/Monitor letter 4/24/81.

Action Taken: DPW expert panel recommendations by 6/12/81.
Conference 4/13/81 - Plaintiff requested stipulation to
extension. See also issue #41.

Action Requested: DPW response to consultant report due in early
1984 on medication minimization protocol at Cambridge State
Hospital.

ISSUE 65 (PARAGRAPH 63) ADEQUACY OF INDIVIDUAL HABILITATION
PLANS.

Source: Plaintiff letter to DPW (Kohnstamm) 5/4/81.

Action Requested by Plaintiff: Request guidelines for individual
habilitation plans.

Action Requested: DPW meet with plaintiff counsel and monitor to
arrive at guidelines for individual habilitation plans using
plaintiff program review booklet as starting point.

ISSUE 67 (PARAGRAPH 22E, 23) EVALUATIONS OF COMMUNITY PLACEMENTS
OVERDUE AT MINNESOTA LEARNING CENTER. (Statewide Issue 111
Consolidated with Statewide Issue 67.)

Source: Monitor/DPW meeting 5/5/81; Letter Commissioner Noot to
Wray 8/16/82.

Action Taken: Monitor recommendation to Court that evaluations
for MLC only for ICF-MR, not for juvenile correction facilities.
Letter Monitor/DPW concerning overdue evaluations 12/15/81.
Monitor letter to P. Kohnstamm 9/1/82.

Action Requested: DPW meet with plaintiff counsel and monitor to
reach stipulation to exclude Minnesota Learning Center from
requirement for community placement evaluations except for
placements to DPW Rule 34 facilities.

ISSUE 70 (PARAGRAPH 67 02A) PROPOSAL FOR COMMITTEE TO REVIEW
PROLONGED USAGE OF RESTRAINT FOR CLIENTS AT STATE HOSPITALS.

Source: Monitor/DPW Meeting 5/20/81.

Action Taken: Boland/Monitor letter 7/4/81: intention to develop policy soon; Monitor/Boland letter 10/8/81 requesting meeting on process. Requested policy statement from DPW 1/13/82 memo to DPW (Wrobel).

Action Requested: DPW have Technical Assistance staff or other consultant review use of prolonged mechanical restraint for recommendations for reduction of the use of these aversive procedures.

ISSUE 72 (PARAGRAPH 70, 71) PROPOSAL TO MODIFY REQUIREMENT ON
REPORTING OF RESTRAINT USE IN STATE HOSPITALS.

Source: Monitor/DPW meeting 5/20/81.

Action Taken: In report to Court, recommend simplification of requirement for progress note entry for repetitive use of restraint 12/15/81. Recommended in second Report to Court.

Action Requested: DPW propose stipulation to simplify progress note entry for repetitive use of restraint in state hospitals.

ISSUE 73 (PARAGRAPH 16, RO 5B) DOCUMENTATION OF EXPLORATION OF
COMMUNITY OPTIONS PRIOR TO COMMITMENT AND ADMISSION TO STATE
HOSPITALS.

Source: Monitor/DPW meeting 5/20/81.

Action Requested: DPW as part of on-going review of admission criteria analyze admissions from community and clarify expectation of community providers and counties in making vigorous attempts to use community and other resources to maintain placements (see Flick v. Noot for sample language) and indicate resources available to assist (TAP, state hospitals).

ISSUE 74 (PARAGRAPH 16, RD 5B) ADMISSIONS TO STATE HOSPITALS
BECAUSE OF BEHAVIOR PROBLEMS.

Source: Monitor/DPW meeting 5/20/81.

Action Taken: DPW/Monitor Meeting 5/20/81: State hospital admission policy might require description of steps taken by DAC and residential providers to manage behavior problems of clients prior to demission from community programs (Flick v. Noot also). Since admissions often are court-based, necessary to intervene prior to state hospital admissions process - communications with local social services agencies and county court systems to sensitive them to alternatives.

Monitor/Wrobel Letter (Chrono 81-65): Washington County letter from Elma Walter regarding assistance in dealing with behavior management problems of several clients in the community. Requested identification of resources by TAP staff to meet challenges in letter and inform parties of availability of resources.

Flick v. Noot et al No 4-78 Civil 359 1979. Section IV C 1. "If advance warning of the possibility for revocation becomes apparent to any of the participants involved in the patient's treatment plan, the patient and all participants shall be informed and every effort made to prevent the conditions which make the revocation necessary. The individual identified in the plan as responsible for monitoring and supervising the implementation of the after care plan shall be responsible to inform all involved individuals, including the patient and shall coordinate all efforts. If such efforts are not sufficient and it appears that revocation is indicated, a revocation shall be submitted to the state hospital medical director."

Action Requested: DPW as part of on-going review of admission criteria analyze admissions from community and clarify expectation of community providers and counties in making vigorous attempts to use community and other resources to maintain placements (see Flick v. Noot for sample language) and indicate resources available to assist (TAP, state hospitals).

ISSUE 79 (PARAGRAPH 30) POSSIBLE CUT IN STAFF OF MR DIVISION,
DPW.

Source: Plaintiff letter 7/7/81.

Action Requested by Plaintiff: Request clarification of
positions which remain.

Action Requested: DPW statement of current staffing pattern and
plan of action to remedy any discrepancy with requirements of
Paragraph 30.

ISSUE 85 (PARAGRAPH 63, 64) ADEQUACY OF PHYSICAL THERAPY SERVICES
TO PHYSICALLY HANDICAPPED STATE HOSPITAL RESIDENTS.

Source: Plaintiff letter 8/14/81.

Action Requested: DPW meet with plaintiff counsel and monitor to
discuss internal review of adequacy of physical therapy services
within state hospitals and possible review by professional
organization with recognized professional standards.

ISSUE 86 (PARAGRAPH 28-33) CORRESPONDENCE OF ASSIGNED
RESPONSIBILITIES AND DECREE DUTIES OF TECHNICAL ASSISTANCE STAFF.

Source: Plaintiff letter 8/14/81.

Action Requested: Department review by staff outside of the
Mental Retardation Division of current tasks of Technical
Assistance staff with respect to requirements of Paragraphs 28-
33.

ISSUE 87 (PARAGRAPH 16) ROUTINE USE OF FARIBAULT STATE HOSPITAL
FOR RESPIRE CARE FOR BRAILLE SCHOOL STUDENTS.

Source: Plaintiff letter 8/14/81.

Action Requested: DFW review state hospital respite use and
issue statement on use of state hospitals versus home and
community respite services to counties and parent groups.

ISSUE 90 (PARAGRAPH 26) STATEWIDE REDUCTIONS OF DEVELOPMENTAL
ACHIEVEMENT CENTER SERVICES.

Source: Monitor 10/1/81.

Action Taken: Meyer/Wrobel memo 1/19/82 outlining cutbacks made.

Action Requested: DPW statement of actions taken to comply with
U.S. District Court Order of January 13, 1982 regarding DAC and
DAC monitoring.

ISSUE 100 (PARAGRAPH 64) WHEELCHAIR PROVISION TO STATE HOSPITAL
RESIDENTS.

Source: Plaintiff letter 3/15/82.

Action Requested by Plaintiff: 1) Random survey of adaptations
of wheelchairs. 2) Request Commissioner to provide clear
standards on reimbursements. 3) Request 7 state hospitals to
provide statement on difficulties in authorization for MA. 4)
Ramification of use of state hospital funds for chairs.

Action Taken: Monitor/DPW (Kohnstamm) letter 3/26/82.

Action Requested: DPW set policy on delay in provision of
wheelchair adaptations deemed required by interdisciplinary team.

ISSUE 102 (PARAGRAPH 89) MONITORING MECHANISM FOR DAC
EXPENDITURES AND ADDITIONAL CAPACITY.

Source: Monitor/DPW Liaison Meeting 4/29/82.

Action Taken: May 4, 1982 meeting to discuss draft of proposal.
Court Order 1/13/82.

Action Requested: DPW statement of actions taken to comply with
U.S. District Court Order of January 13, 1982 regarding DAC and
DAC monitoring.

ISSUE 105 (PARAGRAPH 24) STATUS OF ADULT FOSTER CARE LICENSE.

Source: Monitor 5/18/82.

Action Taken: In second report to Court, recommended parties stipulate on topic in light of failure of state to develop a rule.

Action Requested: DPW statement on policy for state hospitals and counties to use in making placement decisions in light of Paragraph 24 provision on adult foster care.

ISSUE 106 (PARAGRAPH 26, 102) SUPPLEMENTARY REPORTING ORDER ON COMMUNITY SERVICES.

Source: Plaintiff letter 7/22/81.

Action Requested by Plaintiff: Recommendation to the court of supplementary reporting order.

Action Requested: DPW and plaintiff counsel reach agreement on criteria for discharge plan and community placement evaluations and for corrective mechanisms to deal with plans and evaluations requiring remediation.

ISSUE 107 (PARAGRAPH 24, 26) REQUEST FOR ISSUANCE OF NONCOMPLIANCE DECLARATION.

Source: Plaintiff letter 7/23/82.

Action Requested by Plaintiff: Issue noncompliance declaration on actions to fulfill paragraphs 24 and 26.

Action Requested: DPW and plaintiff counsel reach agreement on criteria for discharge plan and community placement evaluations and for corrective mechanisms to deal with plans and evaluations requiring remediation.

ISSUE 108 (PARAGRAPH 88, 90) DPW LEGISLATIVE PROPOSALS FOR 1983 SESSION.

Source: Plaintiff letter 7/19/82.

Action Requested by Plaintiff: DPW agree to provide legislative proposals to plaintiff counsel and monitor and identify contact person for this action.

ISSUE 109 (PARAGRAPH 30) MENTAL RETARDATION DIVISION STAFFING.

Source: Plaintiff letter 7/19/82.

Action Requested by Plaintiff: Monitor ask Commissioner to list positions in the Mental Retardation Division. See also #79.

Action Taken: Noncompliance Notice 9/16/82. Memo Wrobel/Wray 1/13/83 Re: Posting vacancy. Memo Wray/Wrobel 1/20/83 Re: Freeze impact.

Action Requested: DPW statement of current staffing pattern and plan of action to remedy any discrepancy with requirements of Paragraph 30.

ISSUE 118 (PARAGRAPH 17-20) EXTENSION OF CHILD'S STAY AT A STATE HOSPITAL: DICK F.; DOB: 3/17/67; DA: 3/11/81 (Brainerd State Hospital Issue 118).

Source: Monitor 10/9/82.

Action Taken: Hearing 2/22/83 at Brainerd State Hospital. Extension until 6/30/83; extension expired.

Action Required: Further action before monitor.

Action Requested: DPW and plaintiff counsel meet to agree on plan of action for addressing children's admissions to and placement from state hospitals.

ISSUE 124 (PARAGRAPH 17-20) EXTENSION OF CHILD'S STAY AT A STATE HOSPITAL: KRISTIE U.; DOB: 4/7/71; DA: 4/16/82 RESPITE; 5/13/82 INFORMAL (Cambridge State Hospital Issue 41).

Source: Monitor 10/9/82.

Action Taken: Anoka County extension request 1/13/82. One year residency at 5/13/83.

Action Requested: DPW and plaintiff counsel meet to agree on plan of action for addressing children's admissions to and placement from state hospitals.

ISSUE 126 (PARAGRAPH 17-20) EXTENSION OF CHILD'S STAY AT A STATE HOSPITAL: JONATHAN J.; DOB: 6/26/70; DA: 12/1/80 (Faribault State Hospital Issue 181).

Source: Monitor 10/9/82.

Action Taken: Hearing 3/22/83. Extension until 6/30/83; extension expired.

Action Required: Further action before the monitor.

Action Requested: DPW and plaintiff counsel meet to agree on plan of action for addressing children's admissions to and placement from state hospitals.

ISSUE 129 (PARAGRAPH 17-20) EXTENSION OF CHILD'S STAY AT A STATE HOSPITAL: KENNETH R.; DOB: 9/2/66; DA: 4/18/81 (Faribault State Hospital Issue 179).

Source: Monitor 10/9/82.

Action Taken: Hearing 2/8/83. Extension to 9/1/83. Extension expired.

Action Requested: DPW and plaintiff counsel meet to agree on plan of action for addressing children's admissions to and placement from state hospitals.

ISSUE 131 (PARAGRAPH 17-20) EXTENSION OF CHILD'S STAY AT A STATE
HOSPITAL: ROBERT P.; DOB: 11/17/74; DA: 11/16/81
(Faribault State Hospital 185).

Source: Monitor 10/9/82.

Action Taken: Hearing 3/22/83. Extension until 9/30/83;
extension expired.

Action Required: Further action before the monitor.

Action Requested: DPW and plaintiff counsel meet to agree on
plan of action for addressing children's admissions to and
placement from state hospitals.

ISSUE 137 (PARAGRAPH 17-20) EXTENSION OF CHILD'S STAY AT A STATE
HOSPITAL: TODD K.; DOB: 1/29/65; DA: 1/6/81 (Fergus
Falls State Hospital Issue 181).

Source: Monitor 10/9/82.

Action Taken: Hearing 2/23/83; extension to 10/31/83; extension
expired.

Action Required: Further action before the monitor.

Action Requested: DPW and plaintiff counsel meet to agree on
plan of action for addressing children's admissions to and
placement from state hospitals.

ISSUE 138 (PARAGRAPH 17-20) EXTENSION OF CHILD'S STAY AT A STATE
HOSPITAL: TAMARA S.; DOB: 7/3/66; DA: 8/6/82 (Willmar
State Hospital Issue 48).

Source: Monitor 10/9/82.

Action Requested: DPW and plaintiff counsel meet to agree on
plan of action for addressing children's admissions to and
placement from state hospitals.

ISSUE 139 (PARAGRAPH 63) RAMSEY COUNTY SUSPENSION OF 100 PERSONS FROM ACTIVE CASELOADS AT CAMBRIDGE.

Source: Monitor 10/22/82.

Action Taken: Memo Stevens/Gordon 4/20/82.

Action Requested: DPW review of case management practice in question with policy statement on enforcement of DPW Rule 185.

ISSUE 145 (PARAGRAPH 26) PROGRAMS OF CLASS MEMBERS AT OTTER TAIL LAKE RESIDENCE.

Source: Plaintiff letter 12/20/82.

Action Requested by Plaintiff: Review programs of two class members at Otter Tail Lake Residence.

Action Required: Monitor review program in connection with next site visit to Fergus Falls State Hospital.

ISSUE 148 (PARAGRAPH 24) NO DAY PROGRAM FOR KIMBERLY LORENCE FROM WILLMAR STATE HOSPITAL.

Source: Plaintiff letter 10/18/82.

Action Requested by Plaintiff: Monitor review of situation.

Action Taken: Memo 11/15/82 from DPW.

Action Requested: As part of response to SW Issue 174 on formal compliance track, DPW formulate and disseminate to counties and state hospitals criteria concerning placement in nursing homes, day program for nursing home residents, and circumstances under which individual habilitation plans are appropriately modified by medical or other conditions.

ISSUE 149 (PARAGRAPH 17-20) ADMISSION OF ANTHONY M. TO FFSH
8/31/82 - CHILD (Fergus Falls State Hospital Issue 185).

Source: Plaintiff letter 1/12/83.

Action Requested by Plaintiff: Monitor confer with DPW central
office personnel on community placement needs.

Action Requested: DPW and plaintiff counsel meet to agree on
plan of action for addressing children's admissions to and
placement from state hospitals.

ISSUE 150 (PARAGRAPH 22 E) PLACEMENT EVALUATION FOR DANIEL K.
ALLEGATION THAT SOCIAL WORKER FROM ST. LOUIS COUNTY DID NOT VISIT
PROGRAM.

Source: Plaintiff letter (cc Wrobel) 1/28/83.

Action Requested by Plaintiff: DPW in supervisory role determine
if social worker visited and if not, provide direction to ensure
future visits as required.

Action Requested: DPW establish criteria for discharge plans and
community placement evaluations for use by state hospitals and
counties by February, 1984.

ISSUE 151 (PARAGRAPH 22 E) COMMUNITY PLACEMENT EVALUATION FOR
ELAINE R. AT OAKRIDGE HOME - QUESTION WHETHER VISIT ACTUALLY
MADE.

Source: Monitor 2/14/83.

Action Requested by Plaintiff: DPW in supervisory role determine
if social worker visited and if not, provide direction to ensure
future visits as required.

Action Requested: DPW establish criteria for discharge plans and
community placement evaluations for use by state hospitals and
counties by February, 1984.

ISSUE 154 (PARAGRAPH 17-20) EXTENSION REQUEST FOR CHILD AT STATE HOSPITAL: CLIFFORD C.; DOB: 1/11/67 (Cambridge State Hospital Issue 76).

Source: Monitor letter 3/3/83.

Action Requested: DPW and plaintiff counsel meet to agree on plan of action for addressing children's admissions to and placement from state hospitals.

ISSUE 162 (PARAGRAPH 17-20) EXTENSION REQUEST FOR CHILD AT STATE HOSPITAL: BOBBY S.; DOB: 7/6/66; DA: 5/27/82 (Fergus Falls State Hospital Issue 190).

Source: Marshall County extension request 6/21/83.

Action Requested: DPW and plaintiff counsel meet to agree on plan of action for addressing children's admissions to and placement from state hospitals.

ISSUE 164 (PARAGRAPH 17-20) EXTENSION REQUEST FOR CHILD AT STATE HOSPITAL: WILLIAM H.; DOB: 8/22/70; DA: 11/15/82 (Brainerd State Hospital Issue 149).

Source: Cass County extension request 8/25/83.

Action Requested: DPW and plaintiff counsel meet to agree on plan of action for addressing children's admissions to and placement from state hospitals.

ISSUE 166 (PARAGRAPH 24, 26) ADEQUACY OF DAY PROGRAM FOR PATRICIA W.

Source: Plaintiff letter 2/3/83.

Action Requested by Plaintiff: Monitor review for compliance.

Action Taken: Monitor site visits; discussions with county on individual request for proposal and implementation.

ISSUE 167 (PARAGRAPH 17-20) EXTENSION REQUEST FOR CHILD AT STATE HOSPITAL: SCOTT W.; DOB: 7/11/81; DA: 9/29/82, DD: 8/12/83, . READMIT 9/20/83 (MLC). (Brainerd State Hospital Issue 153).

Source: Clay County extension request 10/5/83.

Action Requested: DPW and plaintiff counsel meet to agree on plan of action for addressing children's admissions to and placement from state hospitals.

ISSUE 168 (PARAGRAPH 26) DAY PROGRAM FOR PERSONS IN NURSING HOMES (FROM WSH #3, 5).

Source: Monitor 10/28/83.

Action Requested: As part of response to SW Issue 174 on formal compliance track, DPW formulate and disseminate to counties and state hospitals criteria concerning placement in nursing homes, day program for nursing home residents, and circumstances under which individual habilitation plans are appropriately modified by medical or other conditions.

ISSUE 169 (PARAGRAPH 26) COMMUNITY PROGRAM MANAGEMENT OF BEHAVIOR PROBLEMS (FROM WSH #45).

Source: Monitor 10/28/83.

Action Requested: DPW as part of on-going review of admission criteria analyze admissions from community and clarify expectation of community providers and counties in making vigorous attempts to use community and other resources to maintain placements (see Flick v. Noot for sample language) and indicate resources available to assist (TAP, state hospitals).

ISSUE 170 (PARAGRAPH 24) ADEQUACY OF RESIDENTIAL SERVICES AT HEARTHSIDE HOMES, TOWER, MINNESOTA.

Source: Plaintiff letter 11/1/83.

Action Requested: Monitor request Commissioner to have review of facts made.

Action Taken: Monitor letter to Commissioner 11/1/83; 11/29/83. Meeting of the parties on December 7, 1983:

NOTE OF MEETING OF PARTIES ON PROGRAMS FOR CLASS MEMBERS AT HEARTHSIDE HOME, MAKI HOME, AND FLOODWOOD DAC; ROOM A CENTENNIAL OFFICE BUILDING SAINT PAUL, 9:00 AM, DECEMBER 7, 1983.

PRESENT: Margaret Sandberg, Warren Bock, Mary Kudla, Deborah Huskins, Lyle Wray.

About fifty specific claims were made in three letters from Luther Granquist on inadequacy of programs and services for a total of six class members served by three facilities. (A partial listing is at the end of this note).

The Department according to Deborah Huskins has not been in direct contact with the counties yet but are willing to do so. (There has been a further licensing site visit to Hawthorne House about two weeks ago and a report is to go to Deborah Huskins). There has been a time period problem for the Department to formulate a clear policy on these matters. No one has asked the counties to make a response to these letters.

Margaret Sandberg described steps taken to define the "county administered, state supervised" human service system in the state. The Assistant Commissioner for Social Services has opened discussions with counties. A CSSA rule regarding supervision was under development but it was found that the Department had no authority to promulgate such an administrative rule.

The Social Services Administration manual is in the process of a complete revision as is the state institution manual. The goal is to have the two mesh.

The Commissioner of Public Welfare is due back on Friday and something will be ready for his signature.

Lyle Wray indicated his sense that the matter under discussion did not involve a substitution of the Commissioner's judgment for that of the county but rather was a simple request that would not be resisted and that there was a certain willingness to hear suggestions on program improvements. It seemed necessary for the Department to do both system reform and individual case by case review and correction since improvement of the case management system is a three to five year effort.

Three things were asked of the Department:

1. A response from the counties involved by December 21, 1983 to the Department of Public Welfare on the factual basis of the allegations in the three letters.
2. A preliminary outline of actions which could be taken to bring the facilities into compliance in the view of the Technical Assistance staff for the next meeting of the parties on this matter.

3. A consideration of the placement options which are available or which could be made available for class members if needed.

NEXT MEETING: 4:00 PM CENTENNIAL OFFICE BUILDING.

INFORMAL MEETING OF COUNTIES, PARTIES, MONITOR 12/22/83.

ISSUE 171 (PARAGRAPH 24) ADEQUACY OF RESIDENTIAL PLACEMENT AT MAKI HOME.

Source: Plaintiff letter 11/1/83.

Action Requested: Monitor have Commissioner request review of facts.

Action Taken: Monitor letter to Commissioner 11/8/83; 11/29/83. Meeting of the parties, December 7, 1983 (see Issue 170 for note).

INFORMAL MEETING OF COUNTIES, PARTIES, MONITOR 12/22/83.

ISSUE 172 (PARAGRAPH 26) ADEQUACY OF DAY PROGRAM AT FLOODWOOD DAC.

Source: Plaintiff letter 11/1/83.

Action Requested: Monitor have Commissioner request review of facts.

Action Taken: Monitor letter to Commissioner 11/8/83; 11/29/83. Meeting of the parties, December 7, 1983 (see Issue 170 for note).

INFORMAL MEETING OF COUNTIES, PARTIES, MONITOR 12/22/83.

ISSUE 173 (PARAGRAPH 22 E) ADEQUACY OF COMMUNITY PLACEMENT EVALUATIONS AND DISCHARGE EVALUATIONS.

Source: Plaintiff letter 10/18/83.

Action Requested by Plaintiff: Ask Commissioner to direct Ramsey County to redo evaluations and resubmit.

Action Taken: Monitor letter to Frank Giberson 11/1/83;

11/19/83. Meeting of the parties, December 7, 1983 to discuss issue:

NOTE OF MEETING, DECEMBER 7, 1983 (AFTER EARLIER 9:00 AM MEETING).

PRESENT: Margaret Sandberg, Warren Bock, Mary Kudla, Deborah Huskins, Lyle Wray.

Margaret Sandberg indicated that Rule 185 will be under revision and that training packages will be developed around case management, and waived services. There is a hope to train up regional state hospitals in the area.

Warren Bock indicated that guidance in the field was needed to get it going and that regional staff will be involved with this task when they are brought on board.

NEXT STEP: Luther Granquist, Warren Bock and Lyle Wray are to meet December 15, 1983 to outline areas for coverage in discharge plans and placement evaluations for later use by state hospital mental retardation program directors in formulating a format for these documents.

Action Requested: DPW establish criteria for discharge plans and community placement evaluations for use by state hospitals and counties by February, 1984.

ISSUE 174 (PARAGRAPH 24, 26) ADEQUACY OF COMMUNITY PLACEMENT FOR BEATRICE J. DISCHARGED FROM FERGUS FALLS STATE HOSPITAL (FFSH Issue #203).

Source: Plaintiff letter 11/21/83.

Action Requested: Monitor issue 95e notice.

Action Taken: Monitor issued fifteenth 95e notice.

Status: On formal compliance track under Consent Decree Paragraph 95.

ISSUE 175 (PARAGRAPH 24, 26) ADEQUACY OF COMMUNITY PLACEMENT FOR KRISTINE L. AT DEMAR CHILDREN'S HOME (children's file).

Source: Plaintiff letter 8/9/83.

Action Requested: Demar respond to factual claims made in

letter.

Action Taken: Demar response 8/18/83.

Action Required: Monitor site visit to review program.

ISSUE 176 (PARAGRAPH 24, 26) ADEQUACY OF COMMUNITY PLACEMENT FOR
MICHAEL P. AT DEMAR CHILDREN'S HOME (children's file).

Source: Plaintiff letter 8/9/83.

Action Requested: Demar respond to factual claims made in
letter.

Action Taken: Demar response 8/18/83.

Action Required: Monitor site visit to review program.

ISSUE 177 (PARAGRAPH 24) APPROPRIATENESS OF RESIDENTIAL PROGRAM
FOR BETH B. AT SHINGLE CREEK OPTION.

Source: Plaintiff letter 9/9/83.

Action Requested: Monitor review of program.

Action Required: Monitor site visit.

ISSUE 178 (PARAGRAPH 22E) ADEQUACY OF COMMUNITY PLACEMENT
EVALUATION FOR EARL B. PLACED AT PINE COUNTY GROUP HOME.

Source: Plaintiff letter 11/17/83 (filed CSH).

Action Requested: Monitor bring to attention of CSH and DPW for
action.

Action Taken: Monitor letter to F. Giberson 11/29/83 requesting
12/6/83 meeting on criteria for discharge plans and placement
evaluations.

Action Requested: DFW establish criteria for discharge plans and
community placement evaluations for use by state hospitals and
counties by February, 1984.

ISSUE 179 (PARAGRAPH 16, REPORTING ORDER 5B) RESPITE ADMISSION
FROM ICF/MR TO WILLMAR STATE HOSPITAL FOR KENNETH B (WSH Issue
#54).

Source: Monitor 10/23/83.

Action Taken: WSH response to request 11/14/83 indicating
disagreement with admission "Ken should have been returned to the
facility"

Action Requested: DFW as part of on-going review of admission
criteria analyze admissions from community and clarify
expectation of community providers and counties in making
vigorous attempts to use community and other resources to
maintain placements (see Flick v. Noot for sample language) and
indicate resources available to assist (TAP, state hospitals).

ISSUE 180 (PARAGRAPH 16, REPORTING ORDER 5B) ADMISSION OF DANIEL
R. 7/22/83 (WSH Issue 55).

Source: Monitor 10/28/83.

Admitted to control excessive fluid intake in community but WSH
response 11/15/83 that, "Excessive fluid intake is not a problem
behavior, and there has been no need to program for this."

Action Requested: DFW as part of on-going review of admission
criteria analyze admissions from community and clarify
expectation of community providers and counties in making
vigorous attempts to use community and other resources to
maintain placements (see Flick v. Noot for sample language) and
indicate resources available to assist (TAP, state hospitals).

ISSUE 181 (PARAGRAPH 24) ADMISSION OF CYNTHIA PALS TO CSH
11/21/83 FROM ADULT FOSTER CARE HOME: "PHYSICALLY ABUSED IN
FOSTER HOME, ... BLACK EYE, CHIPPED TOOTH, SCRATCHES." (CSH Issue
119).

Source: Monitor 12/20/83.

Action Requested: DFW review of circumstances requested and
statement on future placements into adult foster care in light of
Paragraph 24 requirements.

ISSUE 182 (PARAGRAPH 23) FAILURE OF RAMSEY COUNTY TO PROVIDE
PLACEMENT EVALUATION FOR JEAN P. PLACED MARCH 28, 1983 AT
MAINSTREAM, INC. DESPITE CAMBRIDGE FOLLOWUP REQUEST.

Source: Monitor 12/21/83.

Action Requested: DPW act to have evaluation submitted by
1/31/84.

ISSUE 183 (PARAGRAPH 23) FAILURE OF ^{Hennepin} ~~RAMSEY~~ COUNTY TO PROVIDE
PLACEMENT EVALUATION FOR MARILYN T. PLACED APRIL 13/83 AT ALICE
HANEY HOME.

Source: Monitor 12/21/83.

Action Requested: DPW act to have evaluation submitted by
1/31/84.

ISSUE 184 (PARAGRAPH 23) FAILURE OF RAMSEY COUNTY TO PROVIDE
PLACEMENT EVALUATION FOR NATHANIEL G. PLACED JULY 11, 1983 AT
PEOPLE'S CHILD CARE.

Source: Monitor 12/21/83.

Action Requested: DPW act to have evaluation submitted by
1/31/84.

STATEWIDE AND COMMUNITY COMPLIANCE ISSUES CORRESPONDENCE

UNRESOLVED ISSUES

SW 41 DRUGS
SW 47 ASSESSMENTS
SW 87 RESPITE
SW 89 RESTRAINT
SW 91 BRUCE L.
SW 102 DAC
SW 103 DARREL S.
SW 105 ADULT FOSTER LICENSE
SW 106 DAY PROGRAM ORDER REQUEST
SW 107 APPROPRIATENESS OF PLACEMENT
SW 108 LEGISLATIVE PROPOSALS
SW 109 MR DIVISION POSITIONS
SW 111 PLACEMENT EVALUATIONS
SW 141 LICENSOR NUMBERS
SW 142 LINDA L.
SW 143 DALE K.
SW 144 JOHN B.
SW 166 PATRICIA W.
SW 170 HEARTHSIDE HOMES
SW 171 MAKI HOMES
SW 172 FLOODWOOD DAC
SW 174 COMMUNITY PLACEMENT BEATRICE J.

RESOLVED ISSUES

SW 99 NEIL R.,
SW 112 LYNNE A.,
SW 113 ROBERT P.,
SW 114 JAMES R.,
SW 115 LOUIS B.,
SW 116 PATRICIA D.,
SW 117 PAUL H.

OFFICE OF THE MONITOR FOR THE WELSCH CONSENT DECREE

201 CAPITOL SQUARE
550 CEDAR STREET
ST. PAUL, MINNESOTA 55101
TELEPHONE (612) 296-9959

MEMORANDUM

December 21, 1983

TO: Richard S. Amado, Ph.D., Consultant
FROM: Lyle D. Wray, Ph.D., Court Monitor *Lyle D. Wray*
SUBJECT: Unresolved Compliance Issues Under Welsch

At the request of the Mental Retardation Program Division of DPW, I am providing you with a current copy of unresolved compliance issues under the Welsch Consent Decree.

Please feel free to call upon me if I might be of assistance in clarifying issues you are considering.

LDW:tk

Enclosure

cc. M. Sandberg (without enclosure)
W. Bock (" ")
L. Granquist (" ")

Chrono 83-334