



Division of Child Care & Early Childhood Education
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Corrective Action Agreement

Date: July 19, 2021
To: Charlotte Lockhart
Owner Name: Woodbridge Behavioral Care of Forrest City, LLC
Facility Name: Perimeter Behavioral of Forrest City
License #: 142

Ms. Lockhart,

This document constitutes a formal Corrective Action Agreement (CAA) agreed upon by Perimeter Behavioral of Forrest City and the Department of Human Services, Division of Child Care and Early Childhood Education, Placement and Residential Licensing Unit. This CAA will be in effect for a period of six months from the date of signing by both parties. This agreement may be extended beyond six months should DHS determine any non-compliance with the CAA during the stated corrective action period.

The purpose of this agreement is to gain and maintain a high degree of compliance with licensing requirements. The following non-compliance areas have been cited during the past six months:

Minimum Licensing Standards (Residential): Section 905 – Behavior Management

905.4 (g) The following actions shall not be used, including as discipline: (g) Physical injury or threat of bodily harm.

- Perimeter Behavioral of Forrest City was cited for the use of physical injury or threat of bodily harm as a form of behavior management multiple times since 1/1/2021. The Licensing Specialist has discussed this concern with the facility and required all child caring staff be retrained on the agency's behavior management program. However, incident reports are still being received regarding the inappropriate use of physical force

as a form of behavior management by staff. The following are dates in which the facility was issued a citation for R905.4 (g).

- [REDACTED]/2021- IC (Involved Child) came to nurse's station crying and stating that IS (Involved Staff) grabbed him by the neck and threw him in his room Saturday [REDACTED] 2021 at around [REDACTED]. IC complained of right elbow and right hip pain. Redness noted to right elbow and hip. IS suspended 5/11/21 and terminated from employment on 5/14/21.
- [REDACTED] 2021- Licensing Specialist viewed camera footage from an incident that occurred on [REDACTED]/2021 and found IS (Involved Staff) had pushed resident IC (Involved Child) in the back almost knocking him to the ground. IS suspended for three days and retrained on Minimum Licensing Standards section 905 on 6/22/21.
- [REDACTED] 2021- IC (Involved Child) reported to the day nurse that on [REDACTED]/2021 he was slammed to the floor by IS (Involved Staff). IS was terminated from employment on 6/23/2021.
- [REDACTED]/2021- IS (Involved Staff) seen shoving IC (Involved Child) to gain his compliance. Camera footage shows inappropriate aggressiveness towards the resident. IS was suspended on 6/29/2021 and terminated from employment on 7/7/2021.
- [REDACTED]/2021- Camera footage reviewed shows IC (Involved Child) being slammed over his back and on to the floor by IS (Involved Staff). IS placed on suspension 6/30/2021 and terminated from employment on 7/6/2021.
- [REDACTED] 2021- IC (Involved Child) sustained an injury to his wrist after an inappropriate restraint hold initiated by IS (Involved Staff) to gain the residents compliance. IS placed on suspension 7/6/2021 and terminated from employment on 7/7/2021.

905.9 Physical restraints shall be performed using minimal force and time necessary. Physical restraint means the application of physical force without the use of any device, for the purposes of restraining the free movement of a resident's body. Briefly holding a child without undue force in order to calm or comfort or holding a hand to safely escort a child from one area to another, is not considered a physical restraint.

- Perimeter Behavioral of Forrest City was cited for staff failing to use the minimal force and time necessary during restraints performed on residents. All staff were retrained on the agency's restraint hold procedure, SAMA, and staff was educated on section R905 of the Minimum Licensing Standards by the Licensing Specialist on 6/22/2021. The following are dates in which the facility was issued a citation for R905.9 since 1/1/2021:

- [REDACTED]/2021- IS (Involved Staff) slammed IC (Involved Child) onto the ground during an inappropriate restraint hold.
- [REDACTED]/2021- IC (Involved Child) reported to the day nurse that on [REDACTED]/2021 he was slammed to the floor by (Involved Staff).
- [REDACTED]/2021- Administrator was reviewing camera footage of a restraint hold conducted by IS (Involved Staff) on IC (Involved Child). It was noticed that staff conducted an improper restraint hold. Additionally, there was no justification for the staff to be placing the resident in a restraint hold.

Minimum Licensing Standards (Residential): Section 911 - Buildings

911.6 All buildings and furnishings shall be safe, clean, and in good repair.

- **Perimeter Behavioral of Forrest City has been cited or given technical assistance on the following dates regarding the condition of the facility.**

- **3/3/2021-** The sprinklers will need to be covered in rooms:105, 106, 107, 206, 305, 307, 308, 405.

The sprinklers will need to be covered and air conditioners screen tightened or replaced in rooms 301, 302, 303, 402, 403, 406, 408 and 407.

Repair the door in room 209

Need fire extinguisher on SRP hall due to construction on the doors and no access to the nursing station where the extinguisher is located

Repair missing tiles in rooms 202 and 206

- **5/6/2021-** Need a cover for the sprinklers in rooms: 107,106, 102, 103, 302, 303, 301, 304, 403, 401, 405,406, 308, 307, 306.

Tiles in the SRU shower needs to be repaired.

Screen for the air conditioner needs to be tightened in dayroom 2A and room 305.

Technical Assistance:

Knob in the shower on the 100 hall is missing. Mr. Jackson stated they do not use that shower due to only allowing 2 residents to use the shower at a time.

Sink in the SRU bathroom is being repaired. Mr. Jackson stated the residents are currently using the sink by the nurse's station.

Wallpaper in room 204 is torn. Mr. Jackson stated they have replaced it several times and the resident keep tearing the paper.

- **6/1/2021-** Ceiling in rooms 301, 403, and 405 need to be repaired.

A/C shield in dayroom 2A needs to be secured back to the wall.

Bathroom door in the gym needs to be replaced.

Sinks in all restrooms used by residents were not functioning and need to be repaired as soon as possible.

- **6/24/2021-** A/C units were randomly out of service around the facility. A/C units have been out of order for about a week. Facility operations manager reports that there is an order in to fix the existing system, some units have already been restored, and portable air conditions along with fans have been brought into the facility in the meantime to cool the rooms. Water was noted in the 100-hall running into the hallway and there may be a possible leak. Noted water damage along hall wall. Licensing Specialist had staff place a caution sign in the hall to warn others and requested maintenance clean up the water as soon as possible. The facility will have the leak assessed.

The agency is required to complete the following:

- The agency shall ensure that all staff having direct contact with children receive re-training on the SAMA and provide documentation of all staff who have attended this training to the Licensing Specialist by 9/30/2021. The agency recently terminated their SAMA instructor from the facility have had a new trainer from their Springdale location training new hires.
- All staff with the agency who have not yet completed Intent training on section R905 of the Minimum Licensing Standards shall complete the training. All remaining staff who did not participate in the previous training held regarding section R905 by the Licensing Specialist and the Program Coordinator on 6/22/2021 shall be trained by the Licensing Specialist or provided with the Zoom link from the previous training. Documentation that all remaining staff have been trained shall be provided to the Licensing Specialist by 8/22/2021.

- The agency shall consistently follow their policies and procedures to ensure all restraint holds performed by staff are debriefed by the staff who participated in the restraint hold and all applicable video footage is reviewed for compliance with the Minimum Licensing Standards. The agency shall provide this protocol to the Licensing Specialist by 8/6/2021.
- The agency shall provide the Licensing Specialist a copy of the agency's weekly programming for the residents. This shall be provided monthly during the course of the formal Corrective Action Agreement.
- The agency shall provide the Licensing Specialist with a formal written agreement by 8/31/21 on which repairs are currently being completed or are in the process of being completed with an estimated day of completion. The agency has now completed needed repairs to the water leak in the 100 hall and repaired/replaced air conditioning units in the facility.

Perimeter of Forrest City

- To have continuity of care and staff support during off tour hours, support staff will be required to be a part of the Milieu Management/Support. (The staff will not be counted in ratio). The staff will interact with the clients in the milieu, not from their office. The staff will be required to be a part of the milieu for a minimum of 4 hours. This will be effective for 60 days and then re-evaluated. The goal is to show support and strengthen the programs from inside out and to increase awareness from other departments and positions as it relates to direct care of the clients.

This document is intended to clarify any outstanding issues and to reduce the risk of misunderstanding or miscommunication.

Please be advised that any serious non-compliance cited during this corrective action period may result in a recommendation for adverse action on the license. Any serious violation of this corrective action plan will result in recommendation for adverse action on the license.

Please do not hesitate to contact the Placement and Residential Licensing Unit if you have any questions or concerns regarding ongoing compliance with this agreement or any other licensing requirement.

The signature of the licensee constitutes full acceptance of the provisions of this agreement.

Charlotta Rokkum, CEO
Owner/ Administrator/Agency Representative

7-27-21
Date

Chelsea Vardell
Licensing Specialist

7/27/2021
Date

Ebonny Russ
Licensing Supervisor

7-27-2021
Date