

Program Statement

OPI: CPD/PSB
NUMBER: P5324.07
DATE: 3/13/2007

SUBJECT: SENTRY Psychology Alert

Function

- 1. **PURPOSE AND SCOPE**. Some inmates with substantial mental health concerns require extra care when their housing is changed or they are transferred. For this group of inmates that pose management concerns, a special protocol has been developed for staff. It is an enhanced tracking and monitoring system to ensure that when a decision to move the inmate occurs:
 - any special psychological needs of the inmate are reviewed and considered by Psychology Services staff;
 - any safety and security concerns are highlighted for non-Psychology Services staff.
- 2. **PROGRAM OBJECTIVES.** The expected results of this program are:
- a. Inmates with substantial mental health concerns will be tracked and monitored ensuring continuity of care.
- b. A reduction in the number of mentally ill inmates who experience a mental health crisis or require transfer to a Medical Referral Center (MRC) as a result of poor adjustment to a non-MRC institution.
- c. Improved staff and inmate safety as a result of monitoring inmates whose mental illness increases the risk of impulsive or aggressive behavior.

3. DIRECTIVES REFERENCED

P1351.05 Release of Information (9/19/02)

P5100.08 Security Designation and Custody Classification Manual (9/12/06)

P5290.12 Intake Screening (3/16/99)

- P5310.12 Psychology Services Manual (8/13/93)
- P6270.01 Medical Designations and Referral Services of Federal Prisoners (1/15/05)
- P6340.04 Psychiatric Services (1/15/05)

4. STANDARDS REFERENCED

- a. American Correctional Association 4^{th} Edition Standards for Adult Correctional Institutions: 4-4399
- b. American Correctional Association $4^{\rm th}$ Edition Performance-Based Standards for Adult Local Detention Facilities: $4-{\rm ALDF}-4{\rm C}-40$

5. **DEFINITION OF TERMS**

- a. Case Management Activity (CMA) PSY ALERT Assignment. The CMA of Psychology Alert should be added when an inmate has substantial mental health concerns that require extra care, and/or the inmate has special psychological needs that pose management or security concerns (e.g., when an inmate's housing is changed or when a transfer occurs).
- b. **Chief Psychologist**. This term refers to the Chief Psychologist or designee.
- 6. **PSYCHOLOGY STAFF RESPONSIBILITIES**. Only a psychologist may enter or remove the CMA assignment of PSY ALERT. The Chief Psychologist is responsible for tracking the SENTRY CMA of PSY ALERT. The Chief Psychologist monitors inmates with PSY ALERT assignments, and conveys management and mental health concerns (including when a PSY ALERT assignment is added or removed from SENTRY) as soon as practicable to appropriate unit team members and Health Services staff members. This includes applicable information found in the Psychology Data System (PDS).

Guidance on the PSY ALERT follows:

- a. Either Central Office Psychology Services staff or the Regional Psychology Services Administrator may enter the PSY ALERT assignment.
- b. This assignment can be added or removed at any stage of an inmate's incarceration (e.g., pretrial detention, holdover facility, medical referral center, or designated facility).
- c. Suggestions on which inmates should have this assignment are included in the Guidelines for Use of SENTRY Psychology Alert Assignment (Attachment A).

- d. PDS is critical to this assignment. Therefore, a psychologist will make an entry into PDS when this assignment is added or removed, or when additional concerns need to be documented. PDS entries should include, at a minimum:
 - the reason for adding or removing the assignment;
 - any management and psychiatric concerns; and
 - recommendations for follow up care.
- e. The Chief Psychologist will discuss Psychology Alert procedures briefly in Annual Training.
- f. Federal Transportation Center. Institutions, such as FTC Oklahoma City, that have a primary prisoner transportation mission serve a unique function in managing the various needs of transferring inmates.
 - At such institutions, Psychology Services will develop local procedures that meet the intent of this PS for the screening and management of PSY ALERT inmates in transit.
- g. Questions regarding implementation of the PSY ALERT assignment should be directed to the Regional Psychology Services Administrator. In addition, a "Frequently Asked Questions (FAQs)" section is also provided in this PS for additional guidance on implementation (see Attachment B).

7. PRIOR TO INITIAL DESIGNATION

- a. Inmates in Pretrial Detention Status in Bureau Institutions.

 Psychology Services staff in pretrial detention institutions are often the first psychologist to have contact with inmates. Frequently, they have valuable mental health information that is beneficial when making initial designation decisions. This is the first opportunity for psychology services to enter the PSY ALERT assignment.
 - During the initial designation process, the designator will review the inmate profile to see whether the inmate has a PSY ALERT assignment in SENTRY.
 - If the PSY ALERT assignment is present, the designator will enter Y (yes) in the OMDT REF item, and include in the remarks section "PSYCH ALERT YES."

- When the Office of Medical Designations and Transportation (OMDT) receives the initial designation request, the designator will contact Central Office Psychology Services for additional review.
- b. Inmates Not in Pretrial Detention Institutions. Before initial designation, many inmates that may need the PSY ALERT assignment are housed in facilities other than Bureau pretrial detention institutions (e.g., housed in local jails). Then, the following procedures apply:
 - When the designator receives mental health information on an inmate (either from the PSI, transporting officials, local jails, etc.), he or she will submit this information to the OMDT. In these cases, the designator does not enter the CMA of PSY ALERT nor will they include "PSYCH ALERT YES" in the remarks section.
 - After the OMDT review, Psychology Services will determine the need for a PSY ALERT based on the mental health information. If this assignment is added, the branch psychologist will enter the rationale in PDS (no PDS entry is necessary for study cases).
- 8. **INTAKE SCREENING.** When an inmate with a PSY ALERT assignment arrives at his or her designated facility, staff are to follow the steps below:
 - The first task involves determining if the inmate can be placed in general population. Ordinarily, an inmate with a PSY ALERT assignment will not be placed in general population until a psychologist reviews and clears him or her.
 - The SENTRY-generated Intake Screening Form now includes a Psychology Alert prompt. When unit team staff see that the PSYCH ALERT is "YES", they are to contact Psychology Services (i.e., Chief or on-call psychologist) for clearance before placing the inmate in general population.
 - When contacted, a psychologist will conduct a face to face interview, and then determine the inmate's suitability for a general population unit. Psychology Services and the Case Management Coordinator are to develop local procedures to clear inmates with a PSY ALERT

assignment (e.g., a psychologist provides written comments and signature on the Intake Screening form, or sends a clearance memorandum to the unit team via Groupwise).

- Based on this interview, a psychologist will determine whether the PSY ALERT assignment should be removed.
- While the inmate is at a designated institution, a psychologist will submit relevant information on an inmate with a PSY ALERT to unit team staff for:
 - ♦ initial classification,
 - ♦ program review meetings, and
 - ♦ pre-release planning.

Unit team staff will request a psychologist's input when the CMA assignment of PSY ALERT is displayed on the Program Review Report form.

- The Chief of Psychology Services will monitor movement of inmates into a Special Housing Unit, to ensure inmates with PSY ALERT receive appropriate management and treatment.
- 9. ROUTINE TRANSFER AND REDESIGNATION. When a routine transfer is considered for an inmate with a PSY ALERT assignment, a psychologist will evaluate his or her suitability for transfer and convey any management and mental health concerns to unit team staff.
 - The Unit Manager or designee must notify the Chief Psychologist whenever a request for inmate movement is forthcoming on an inmate with a PSY ALERT assignment. The best time for communication on inmate movement is when program review meetings occur.
 - When contacted by Unit Team staff about a proposed transfer of an inmate with a PSY ALERT assignment, the Chief Psychologist (or designee) must provide clearance regarding the proposed movement in writing via GroupWise. Inmates with a PSY ALERT assignment may require special accommodation with housing and transfers.
 - In addition to clearance comments, this memorandum will contain information regarding the inmate's suitability for transfer and will convey any management and mental health concerns related to the inmate's designation and transfer (see Attachment C, The Memorandum to Unit Team Regarding Movement of Inmate with Psychology Alert Assignment). A

psychologist will enter this memorandum into PDS, and note for the unit team whether it is FOI-Exempt.

- The Unit Manager or designee will include the Chief Psychologist's remarks regarding the proposed movement in the medical section of the Request for Transfer/Application of Management Variable form (EMS-409).
- Before transfer, the Chief Psychologist must coordinate with Health Services staff to ensure that relevant mental health information is conveyed on the Medical Summary of Federal Prisoner/Alien in Transit form (BP-659).
- Any necessary precautions, management concerns, and/or special needs that may affect transporting this inmate should be added to the BP-659. Some types of instructions to include are:
 - ♦ potential to engage in self-harm,
 - ♦ potential for assaultive or disruptive behavior,
 - ♦ level of cooperation regarding psychiatric or medical treatment, and/or
 - ♦ the need for specific medications.

The SENTRY-generated In-transit Data form will reflect automatically an inmate's PSY ALERT assignment.

10. **OTHER TRANSFERS**. Some transfers may occur with limited advance notice (e.g. transfers to hold-over institutions for Court purposes or transfers to a community hospital for emergency medical care). In these cases, the Chief Psychologist or on-call psychologist will be notified when staff become aware of such a transfer involving an inmate with a PSY ALERT assignment.

In cases of transfers involving hold-over status, the psychologist notified will communicate with mental health staff at the receiving facility by phone and/or Groupwise (e-mails are acceptable only if the inmate will be housed at another Bureau institution).

In cases involving staff escorts (e.g., brief outside hospitalization), the psychologist will communicate with the Lieutenant or staff member coordinating the escort. Communication will address continuity of care, staff safety, and appropriate monitoring of the inmate for signs of mental deterioration during transit or hold-over confinement.

- 11. **HOLDOVER UNITS**. Psychology Services, Unit Management, and Health Services staff should coordinate closely when inmates with a PSY ALERT assignment are housed in a holdover unit.
 - If an inmate is placed in a holdover unit, staff conducting the intake screening will notify Psychology Services staff of the inmate's arrival.
 - Once notified, a psychologist will:
 - ♦ review the BP-659,
 - ♦ conduct a face to face interview with the inmate, and
 - provide to staff any recommendations, concerns, or restrictions pertaining to the arriving inmate's management.

The Health Services BP-659 form may need amending, based on this interview.

- 12. TRANSITION, COMMUNITY-BASED PLACEMENT, AND POST-RELEASE SUPERVISION. When an inmate is nearing release from Bureau custody (via community-based placement, direct release to U.S. Probation staff, or release to detaining officials), the Chief Psychologist must make a final determination about continuing a SENTRY PSY ALERT assignment. This is a critical time since the assignment will remain with the inmate upon release.
 - Unit team staff will circulate the Medical/Psychological Evaluation for Transfer to a CCC Type Facility (BP-351) when appropriate.
 - The Chief Psychologist or designee will include remarks on the BP-351 for any inmate with a SENTRY PSY ALERT assignment.
 - The Clinical Director or designee must also make remarks on the BP-351 for any inmate with a PSY ALERT assignment. These remarks should include, but are not limited to, information not already provided regarding:
 - special medical or psychiatric conditions or diagnoses;
 - ♦ all current medical and psychiatric medications; and
 - instructions regarding the need for follow-up care.

If psychiatric medications have been prescribed or recommended for the inmate, but he or she has been non-compliant or refuses to take medication, this should be noted specifically on the BP-351.

13. **SPECIAL CIRCUMSTANCES**. Study cases and psychiatric transfers to and from Medical Centers will have a PSY ALERT assignment if substantial mental health concerns are present that require extra care, and/or the inmate has special psychological needs that pose management concerns. Each case will be reviewed individually to determine if the assignment is warranted.

When necessary, the Regional Psychology Services Administrator must ensure the PSY ALERT assignment is entered for mentally ill inmates housed in contract facilities.

/s/ Harley G. Lappin Director

GUIDELINES FOR USING THE SENTRY PSYCHOLOGY ALERT ASSIGNMENT

Generally, the SENTRY PSY ALERT assignment is to be applied in special mental health cases that will likely pose management and security concerns for the institution when an inmate's housing is changed or when a transfer occurs. The guiding principle is that the continuum of care must be maintained.

Application of the SENTRY PSY ALERT assignment requires sound clinical judgment. The intent of this assignment is to ensure, if movement occurs, that all staff consider the special psychological and management-related risks associated with the inmate.

Examples of when Psychology Services Staff should apply the PSY ALERT assignment:

Example 1 - The inmate requires psychotropic medication for the management of psychotic symptoms, and has a recent history of being non-compliant with treatment.

Example 2 - The inmate is at risk for self-harm when distressed.

Example 3 - The inmate has a history of sexually predatory behavior that is recent and occurred in an institution environment. Psychology Services staff have identified the offender to be a risk to staff and others.

Examples of when not to apply PSY ALERT assignment:

Example 1 - The inmate is involved in a psycho-educational group or individual counseling, and a transfer would result in mild or moderate adjustment problems.

Example 2 - The inmate is receiving medication from a chronic care clinic for a moderate mental health disorder (e.g., anxiety or mild depression), and is compliant with medication orders.

Example 3 - The inmate has a previous suicide attempt that is not recent and he or she is not currently dangerous to self or others.

Frequently Asked Questions (FAQs)

- 1. Is the PSY ALERT assignment intended to replace the MDS assignment of Mentally Ill?
 - No The MDS assignment of MEN ILL was intended for a different purpose and has a specific definition. Although some inmates with the MDS assignment of MEN ILL are candidates for the PSY ALERT assignment, the focus of the PSY ALERT assignment is different. Accordingly, staff should not add a PSY ALERT assignment automatically for an inmate who has the MDS assignment of MEN ILL.
- 2. Can you provide an example of an inmate who would have had an MDS MEN ILL assignment but not a PSY ALERT assignment?
 - Yes An inmate is diagnosed with Schizophrenia, is on medication for this disorder, and has complied with all treatment recommendations when transferred (no signs of disruptive behavior at all). He may have a MEN ILL assignment but not a PSY ALERT assignment.
- 3. One of the examples of when to add a PSY ALERT assignment includes a sex offender. Are all inmates that are sex offenders the target of the PSY ALERT assignment?
 - No We are targeting only a small segment of the sex offender population. SENTRY PSY ALERT is intended for staff to better track sex offenders whose predatory sexual behavior occurred during incarceration and who pose a risk to staff and inmates. Tracking mechanisms are already in place for other types of sex offenders (see the Public Safety Factor definition for Sex Offender).
- 4. The definition and examples for Psychology Alert seem to give a psychologist discretion on when to apply or not apply the PSY ALERT assignment? Why?

This policy provides guidelines (only) for psychologists on when to apply PSY ALERT. It was intentional that the PSY ALERT assignment was not defined by AXIS level disorders contained in the Diagnostic Statistical Manual. It is expected that sound clinical judgment will be used for this assignment.

5. What is meant by "continuity of care?"

For this Program Statement, "continuity of care" is a generic term. It is much more than simply having BOP psychologists communicate mental health information. "Continuity of Care" also means ensuring that those staff outside psychology services are aware that an inmate has special psychological needs, and that his or her movement requires special precautions.

6. If the inmate has a PSY ALERT assignment when he or she leaves Bureau custody, will it remain in SENTRY?

Yes - The SENTRY PSY ALERT assignment will remain with the inmate on SENTRY after he or she leaves Bureau custody. This approach will allow U.S. Probation Officials to identify these inmates while on Supervised Release. Additionally, the assignment remains with the inmate if he or she returns to Bureau custody.

7. Can an inmate be placed in a minimum security facility with a PSY ALERT assignment?

Yes - However, when an inmate is being considered for transfer to a camp, a psychologist should evaluate very carefully whether the SENTRY PSY ALERT is still needed. This is because the local jail may be used as the Special Housing Unit, and additionally, there are resource limitations consistent with a mission of lesser security.

8. When an inmate is scheduled for transfer, should a psychologist make comments on the In-Transit Data form that the unit team prepares, or the Medical Summary of Federal Prisoner/Alien In Transit Form, or both?

The unit team may want to include comments on the In-Transit Data form since the PSY ALERT will be conveyed on the form. The psychologist should provide them with any helpful information when requested. However, in all PSY ALERT cases, information from psychology services must be included on the Medical Summary of Federal Prisoner/Alien In-Transit Form. Health Services and Psychology should develop systems of control so that this can be accomplished before an inmate with a SENTRY PSY ALERT transfers.

9. Is the Psychology Data System important to the PSY ALERT assignment?

Yes - Justifications for inclusion or removal of this assignment should always be made in PDS. Psychologists are to make the entry in the category "PSYCH ALERT". More specifically, the body of the PDS notation must include:

- 1) justification for addition or deletion of PSY ALERT;
- 2) Concerns or precautions regarding housing and movement (if any); and,
- 3) Recommendations for follow-up (if necessary).

However, OMDT staff who designate study cases are not required to make an entry in PDS.

10. The policy states that a psychologist must conduct a face to face interview before clearance of the inmate to a general population unit. What happens when an inmate arrives on a bus after-hours?

Inmates with a SENTRY PSY ALERT assignment must always have a face to face interview with a psychologist before release to a general population unit.

11. What happens if an inmate is housed in holdover short-term (e.g., overnight) and has a PSY ALERT assignment?

Inmates with a SENTRY PSY ALERT assignment must always have a face to face interview with a psychologist before release from Receiving and Discharge (R&D).

12. Should Psychology Services staff develop local systems of control to know when inmates are arriving and departing their facility?

Yes - If not already in place, Psychology Services staff should develop local systems of control with the CMC, and/or unit team staff to ensure they are notified when a busload is arriving or leaving.

MEMORANDUM TO UNIT TEAM REGARDING MOVEMENT OF INMATE WITH PSYCHOLOGY ALERT ASSIGNMENT

(Include the following in memorandum)

- I. Reason for SENTRY PSY ALERT assignment (diagnosis or presenting problem)
- II. Current mental health treatment
- III. Suitability for transfer
- IV. Treatment recommendations that might be relevant to the designation process