

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

EDWARD BRAGGS, et al.)	
)	
Plaintiffs,)	
)	
)	
v.)	
)	
)	
JEFFERSON DUNN, in his official)	
capacity as Commissioner of the)	
Alabama Department of)	
Corrections, et al.)	
)	
Defendants.)	

CIVIL ACTION NO.
2:14-cv-00601-MHT-WC
Judge Myron H. Thompson

**JOINT NOTICE OF AGREEMENT REGARDING PRODUCTIONS
RELATING TO PEOPLE WITH SERIOUS MENTAL ILLNESS IN
RESTRICTIVE HOUSING**

The Parties hereby notify the Court of the following agreed-upon document productions relating to people with serious mental illness in restrictive housing:

1. [Starting November 1, 2019] Wexford will perform an audit of the 7-day assessments contained in the RHU Order (doc. 1815-1 at 4-6) to determine if the 7-day assessments are being timely and properly completed.
 - a. A random sampling of the 7-day assessments for 10% of the inmates for whom 7-day assessments were completed system-wide will be forwarded to the Director of Psychiatry at Wexford Health Sources, Inc. or any

- Wexford regional office clinician(s) and quality assurance personnel designated by Wexford's Director of Psychiatry for this purpose on a monthly basis.
- b. The sampling of 7-day assessments should include, but not be limited to, inmates in the RHU who are coded as MH-C and not flagged as SMI.
 - c. As part of its continuous quality improvement program, Wexford will review the 7-day assessments using audit tools developed by Wexford and will develop any necessary corrective action plans.
 - d. Wexford will report the results of its audit of 7-day assessments and send the underlying 7-day assessments to ADOC's Office of Health Services (OHS) on a quarterly basis. ADOC's OHS will review the report and underlying documents to determine whether any additional corrective action is necessary.
 - e. If additional corrective action is necessary, ADOC's OHS will request Wexford prepare and/or revise a corrective action plan and implement such plan.
 - f. Plaintiffs' counsel will be provided Wexford's quarterly report, the underlying 7-day assessments, ADOC's response to Wexford's audits, any further correspondence between ADOC and Wexford on the audits or

corrective action plans, and any corrective action plans within twenty-one (21) days of the OHS quarterly review.

2. [Starting Tuesday, October 29, 2019.] ADOC will add two (2) columns to the Tuesday RHU report to make it more informative:
 - a. When ADOC anticipates moving the inmate?
 - b. What administrative or logistical reason has the inmate's move been delayed (i.e., lack of bed space, classification issue, enemy validation, etc.)?

The information provided in these two (2) additional columns will be based on information available on the Thursday before the report is due and contain ADOC's best estimation of the timeframe to move an inmate. Defendants will continue to file these reports under seal as ordered by the Court in Doc. Nos. 2345, 2377.

3. [By December 2, 2019] Wexford will provide Plaintiffs an updated master roster consistent with the following:
 - a. The updated master roster will be based on information for the mental health caseload as of October 1, 2019 and include, as to each inmate on the mental health caseload:
 - b. Name;
 - c. Facility;
 - d. AIS #;

- e. Mental Health Diagnosis;
- f. Mental Health Code;
- g. SMI flag (yes or no); and
- h. Medications prescribed (if any).

As to item numbers 1 and 2 above, ADOC will continue those production obligations until external monitoring is in place, either by agreement of the Parties or Court order.

Dated: October 4, 2019

Respectfully Submitted,

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