



**MENTAL HEALTH AND SUBSTANCE  
ABUSE SERVICES POLICY  
COMMONWEALTH OF PENNSYLVANIA**

**OFFICE OF MENTAL HEALTH AND SUBSTANCE ABUSE SERVICES**

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**BY:**

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**SUBJECT:**

Guidelines for establishing and granting levels of independence in the State Mental Hospitals

**SCOPE:**

State Mental Health Hospitals- Consumers with Civil Commitments

**PURPOSE:**

The purpose of this policy is to institute uniform guidelines for establishing and levels of independence within the state mental hospital system. The State Mental Hospitals (SMHs) shall adopt and implement the attached procedures related to the establishment and granting of levels of independence to individuals who are receiving services in the SMHs. All SMHs will revise their policies, procedures, and practices accordingly.

**BACKGROUND:**

The Office of Mental Health and Substance Abuse Services (OMHSAS) supports the principles of Recovery and assures that all treatment be provided in the most appropriate and least restrictive environment consistent with the safety of all whom we serve, welfare of staff, and the community. The assignment of levels of independence is based on the ability of the individual to safely manage a given level without unacceptable risk of serious harm to self or others. Levels of independence may not be reduced or placed on hold as punishment. Punishment is defined as an arbitrary and/or retributive act which has no therapeutic value supporting recovery.

**COMMENTS AND QUESTIONS REGARDING THIS BULLETIN SHOULD BE DIRECTED TO:**  
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Harrisburg, PA 17105 or phone 717-705-8152.

## DISCUSSION:

The levels of independence are a progressive system of independence based on the person's ability to assume and maintain responsible, self-governed behavior when granted unsupervised, off-unit free time. Independence also includes being able to travel to programs, activities, and appointments without staff supervision. Final authority and responsibility for granting of a level of independence rests with the treatment team psychiatrist; however, the CEO or designee shall reserve the right to include changes on a consumer's independence level as warranted. For more information on the writing of administrative orders review SMH-06-01.

### Definition:

1. **Absent Without Leave (AWOL):** A consumer is considered AWOL when he/she is absent from a location defined by the consumer's level of independence regardless of leave or legal status. A consumer is considered to have gone AWOL if the consumer has not been accounted for when expected to be present. A consumer who leaves the hospital via an established "AMA" process should not be reported as an AWOL. Any consumer who is observed to be off hospital grounds without authorization; or any consumer who is determined to have been off grounds without authorization; or any consumer who does not return to his/her living unit from grounds privileges at the time specified, or fails to report for a scheduled on-or-off grounds activity at the time specified; or any consumer who fails to return from an authorized leave of absence on the stated date and time and the hospital is unable to establish rationale for failure to return; or any consumer who is discovered/believed to be missing from a locked living unit or from an escorted on-or-off grounds activity is considered AWOL.
2. **Admission Risk Profile/Current Risk Profile:** An assessment of past and current risk behaviors which, when identified, assist the treatment team psychiatrist in determining appropriate level of independence for a consumer.
3. **Serious Event:** Includes physical assaults (staff, peers or others); extortion; threatening behavior; stealing; possession of alcohol or illegal drugs; weapons; AWOL; predatory sexual behavior; and smoking in unauthorized areas.
4. **Minor Event:** Includes not attending assigned programs and possession of contraband not listed in the serious event definition.
5. **Ground Card:** A picture ID card is provided to all consumers who have an unlimited level of independence that allows the consumer to be

unsupervised on the grounds of a specified State Mental Hospital. This is for use by State Mental Hospitals which use a picture ID system.

6. **Level of Independence Board:** A clip board in the unit/ward office that has everyone's name, level and possible grounds/free time listed. This board is to be checked by staff prior to each free/grounds times for possible changes.
7. **Hold Status:** Current level of independence is reduced or held due to a serious or multiple minor events. The amount of minor events that would result in hold status is up to the discretion of treatment team. An individual being placed on hold status for a serious event is also up to the discretion of the treatment team.

### Consumer Level of Independence Guidelines:

1. **Schedule Reviews:** Treatment team reviews consumer's level of independence once a week for possible changes as clinically indicated for **every** consumer.
2. **Restricted Level of Independence:** On this level the consumer is limited to the unit or ward. When a consumer leaves the unit or ward he/she is in the care of staff. The consumer may leave the building for appointments and with staff supervision (minimum of 1:1 consumer to staff ratio on and off grounds, 2:1 off grounds as clinically indicated at the discretion of the treatment team psychiatrist). This schedule is reserved for newly admitted consumers, consumers considered to be a serious danger to self or others or consumers who are responsible for a serious event. Prior to a level of independence change for new admissions an admission risk profile must be completed by the treatment team.
3. **Limited Level of Independence:** On this level the consumer is capable of attending programs while in supervision of staff, leisure activities, medical appointments on grounds, off ground trips with staff and therapeutic leaves. The determination of what activities listed in this limited level the consumer is capable of is individualized based on the treatment team's recommendations.
4. **Full Level of Independence:** Depending on the determination of the hospital's use of ID cards the consumer will receive a ground card with the consumers name and picture that shows that the consumer is eligible for up to 5 hours free time each weekday. The exact amount time is up to the discretion of the treatment team psychiatrist with input from the treatment team as clinically indicated. The hours may exceed 5 hours on weekends and holidays. The total hours of free time for a consumer may be reduced or increased (up to 7 hours) based on daylight savings time and/or

inclement weather. If the SMH chooses not to use a grounds card the individual will sign in and out at the unit or ward office.

5. **Enhanced Level of Independence (Optional Level use of this level at any hospital will be determined by CEO):** This level allows the same amount of free time/grounds time for a consumer on the full level of independence but also allows the consumers to sign themselves out for off grounds leave by themselves.

Guidelines for eligibility of ground cards/free time initially ordered or reinstated from a hold status:

1. The consumer currently is not on a special level of care or manifesting evidence of being homicidal, assaultive, suicidal, self-mutilating, self-injurious, a danger to others, destructive to property of others, or an AWOL risk.
2. Risk factors for AWOL (including criminal history), current history of drug or alcohol abuse, past AWOL behavior, and current situational stress have been mitigated by treatment.
3. Delusions, hallucinations, cognitive impairment, confusion, or other symptoms of mental illness do not significantly impair the consumer's ability to act safely and responsibly when unsupervised for brief time periods.
4. The consumer can function in off unit settings and is able to occupy him/herself in a safe constructive manner without supervision.
5. The consumer is oriented to the hospital campus. The consumer has been shown the campus by a staff member and has a copy of the map of the grounds.
6. The consumer's communication skills are adequate to make his/her needs known.
7. The consumer attends most scheduled programs and follows hospital rules.
8. For reissued levels (from hold status) the consumer has not had any serious event in the past three days (or less at the discretion of the treatment team) or the consumer has not had any minor event for twenty-four hours (or less at the discretion of the treatment team).

## Consumer Responsibilities:

1. Consumers using ground card/free time will sign-in/out for the period granted in the ward or unit office.
2. For use at SMHs that choose to use ID cards: the consumer will be given a photo ID card indicating he/she has grounds/free time. This card will not have the hospital name listed for privacy purposes. This ID card is to be carried. It will be given to the consumer by nursing staff assigned to accountability. The consumer is responsible for turning in the grounds card upon return from free time.

## Ward Staff Responsibilities:

1. Review Level of Independence Board prior to each free/grounds time to ensure only consumers with the unlimited or enhanced level of independence are given free/grounds times during the scheduled time for each consumer.
2. Complete accountability checks as per SMH procedure. Check on consumer daily accountability log when each consumer leaves and returns to the ward.
3. Display within the wards bulletin board:
  - Organization of Levels of Independence
  - Required Check in and Ground Card Times/Free Time
  - Map of the Hospital Campus with restricted areas identified.

## Reasons to reduce Consumer Level of Independence or withhold Ground Cards/Free Time:

1. Ground card/free time may be withheld for serious events or minor events. For serious events a ground card may be held for a maximum of three days or the consumer's level of independence may be changed (the choice to place someone on hold or the actual amount of time up to three days is up to the discretion of the treatment team and the treatment team psychiatrist). For minor events ground cards may be withheld for up to twenty four hours from the time of the event.
2. The decision to hold or change a level of independence is the responsibility of the treatment team and the treatment team psychiatrist. If an event occurs during hours when the treatment team and the psychiatrist are not available, the physician on-site and the registered

nurse on-site will determine if holding the consumer's ground card/free time is necessary.

3. It is extremely important for all staff to listen carefully to a consumer's explanation before assessing the situation as a serious event or a minor event. Staff must not assess reflexively a serious event or minor event without first evaluating the consumer's account of the situation.
4. At the next morning report, scheduled or unscheduled treatment plan conference (following the serious incident or multiple minor events), the team will meet and review the circumstances of the serious event, the consumer's current behavior and update or revise the Individualized Treatment Plan (ITP) accordingly.
5. During times when consumers' level of independence has been reduced or placed on hold the consumer will continue therapeutic programs. If the consumer is placed on a special level of care the consumer will still attend programs with staff supervision unless otherwise specified by the treatment team psychiatrist.

#### Documentation Necessary for reduction or change of Consumer Level of Independence:

1. A physician order or CEO administrative order specifying the change in consumer level of independence must be written for any change to be implemented.

#### Complaints about Consumer Level of Independence:

1. Consumers who have complaints about their Level of Independence are initially to address these concerns to their attending psychiatrist and the treatment team. During this meeting the consumer is to be informed by the treatment team that if the consumer is not satisfied with the outcome of the decision, the consumer has the right to Appeal to the Human Rights Committee.
2. The Advocate at each of the hospitals will assist any consumer who wishes to appeal to the Human Rights Committee.
3. This process does not preclude the consumer from instituting appropriate legal proceedings.