

The Honorable MARSHA J. PECHMAN

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

CASSIE CORDELL TRUEBLOOD, next  
friend of A.B., an incapacitated person, et al.,

Plaintiffs,

v.

THE WASHINGTON STATE  
DEPARTMENT OF SOCIAL AND  
HEALTH SERVICES, et al.,

Defendants.

NO. 2:14-cv-1178 MJP

DECLARATION OF  
RICHARD WEAVER

I, Richard Weaver, am over the age of 18 years of age, competent to testify to the matters below, and declare based upon personal knowledge:

1. I am the Chief Executive Officer at Central Washington Comprehensive Mental Health (Comprehensive) which provides a full continuum of mental health and substance use disorder services in 10 counties in Eastern Washington.

2. On April 8, 2016, I learned of the Court's oral ruling on the Motion for Temporary Restraining Order. I was informed by Assistant Secretary Reyes of the Court's order, and based on the information she provided, I directed that neither the second tier nor the seclusion and restraint room be used, and that the stairwell be blocked, effective immediately.

DECLARATION OF RICHARD  
WEAVER

-- NO. 2:14-CV-1178 MJP

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ATTORNEY GENERAL OF WASHINGTON  
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3. By April 12, 2016, the metal grate in the seclusion and restraint had been removed. I submitted a picture of that change to the State on April 14, 2016. It is my understanding that pictures of these modifications were submitted to the Court Monitor on April 14, 2016 and to the Court on April 25, 2016. *See* Dkts # 225\_2 and 225\_3. Comprehensive also revised its seclusion and restraint policy, and began training staff on the changes. *See* Dkt # 225\_2. Comprehensive, with assistance of to the Department and the Attorney General's Office, submitted those policies to the Court Monitor for review and comment. *Id.*

4. On Friday, April 22, 2016, Dr. Mauch sent Dr. Debra Pinals' Report to the Department. The report detailed her last visit to the Yakima facility and included her review of the seclusion and restraint policy. Comprehensive received a copy of this report on Tuesday, April 26, and began revisions to the policy based on that feedback.

5. On May 3, 2016, Comprehensive provided another revised seclusion and restraint policy to the Department, along with additional revised policies. It is my understanding that the revised policies were sent to Dr. Mauch on May 7 for final approval.

6. On May 13, 2016, Dr. Mauch sent her approval of the policy, along with final suggested edits. A true and correct copy of her email is attached as Attachment A.

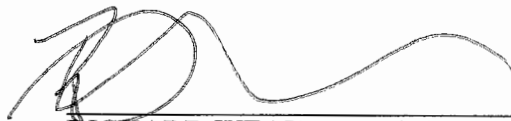
7. Comprehensive has adopted the final changes suggested by Dr. Mauch, and is again training staff on the updated policies. The final policy is attached as Attachment B. Also attached are additional relevant policies revised by Comprehensive as part of this effort: Attachment C: EC-048 Aggressive & Assaultive Behavior Management, and Attachment D: PC-053 Staff Safety While Providing Clinical Care.

8. The revised policy has, and will continue to be, reviewed at each shift pass down following the most recent revisions to the policy. This is being continued to ensure all staff demonstrate competence. New staff continue to be trained in the policy and in the ProAct and PERT intervention strategies and trauma informed crisis intervention strategies as a part of

1 their initial orientation. Staff from the program have also been trained in a “train the trainer”  
2 program to support both new staff training and periodic reviews. Additional training efforts  
3 were also detailed in the Competency Restoration Center Staff Training document submitted to  
4 the Court on April 25, 2016. *See* Dkt # 225\_5.

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6 Pursuant to 28 USC § 1746(2), I declare under penalty of perjury that the foregoing is  
7 true and correct.

8 Executed on May, 2016, at Yakima, Washington.

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11 RICHARD WEAVER, MA, LMHC  
12 President/CEO  
13 Central Washington Mental Health  
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