

**County of Humboldt  
Eureka, California**

**RFP # DHHS2021-06**

Provision of Medical Services at Humboldt Correctional  
and Detention Facilities

**Technical and Cost Proposal**

**December 6, 2021; 5:00 PM PST**



**Respectfully Submitted to:**

County of Humboldt  
Sheriff's Office Att: Captain Duane Christian  
825 5<sup>th</sup> Street  
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707-441-5105  
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**Submitted by:**

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This submission includes the following required copies: 1 original, 4 copies, and 1 electronic USB version

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## 1 Introductory Letter

California Forensic Medical Group (CFMG) and Wellpath appreciate this opportunity to continue our 22-year partnership with Humboldt County by submitting this proposal to provide medical and dental services to the Humboldt County facilities.

Our 37-year record of success in California reflects our commitment to the quality of care we deliver. We will never lose focus on the services we provide to our California clients. We also have unmatched insight into the operations of your facilities, having served as the County of Humboldt's medical provider for 22 years. We are uniquely qualified to continue to partner with the County as we understand the culture built by Sheriff Honsal and the teams at your facilities.

While we are proud of our past successes, this proposal is about the future of the health services program at the Humboldt County facilities. As your current provider, we have a solid foundation to build upon and we are proposing several enhancements:

- **Medical Staffing.** We have identified potential staffing adjustments to further improve your health services program and are proposing an additional 1.875 FTEs above your current matrix. Each of our proposed staffing enhancements provides value to both the County and our patients by improving access to care and creating operational efficiencies.
- **Medication Assisted Treatment Program.** In alignment with the RFP requirements, we are proposing an optional medication assisted treatment (MAT) program. Implementing a MAT program will create outcomes beneficial to both our patients and the County.
- **National Commission on Correctional Healthcare Accreditation (NCCHC).** Our proposed staffing plan is optimal for a program seeking NCCHC accreditation. We will ensure that all applicable facilities are accreditation audit ready within the first 18 months of the new contract. This accreditation preparation will be provided at no cost to Humboldt County.

### Wellpath Offers Zero Transition Risk

Transition carries uncertainty and risk, even with experienced companies. Selecting Wellpath eliminates transition, removes the inevitable challenges that any new contractor would experience, and reduces your risk significantly. With Wellpath as your continued provider, there will be no interruption of services, we can focus on accreditation preparation, and you can expect full continuity of your well-run healthcare program and electronic medical record. We are confident that as you read our proposal, you will see our commitment to continue our comprehensive, quality program of compassionate patient care while delivering added program enhancements, operational efficiencies, and reduced risk for Humboldt County.

We are Wellpath. We are the right people, striving *always to do the right thing!* We welcome the opportunity to discuss this proposal in person, and to demonstrate our passion and commitment to exceeding your expectations.

Sincerely,



Kip Hallman  
President  
858-283-8619  
kip.hallman@wellpath.us



C.J. Whitfield  
Director of Partnership Services  
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New Hire Welcome Video (USB drive) – **CONFIDENTIAL\*** ..... Front Pocket of Original Binder  
Adult Suicide Prevention Video (USB drive) – **CONFIDENTIAL\*** ..... Front Pocket of Original Binder  
Juvenile Suicide Prevention Video (USB drive) – **CONFIDENTIAL\*** ..... Front Pocket of Original Binder

**\*CONFIDENTIAL AND PROPRIETARY ATTACHMENTS**

In accordance with Sections 6254 and 6254.15 of the California Government Code concerning trade secret privileges and corporate financial records protections, Wellpath LLC respectfully requests that the information labeled CONFIDENTIAL be redacted from any distribution of this document pursuant to requests under Section 6252 of the California Government Code, or for any other reason, as disclosure of this information would cause injury to Wellpath LLC’s competitive position.

### 3 Signature Affidavit

**REQUEST FOR PROPOSALS #DHHS2021-06  
PROVISION OF MEDICAL SERVICES AT HUMBOLDT COUNTY CORRECTIONAL AND  
DETENTION FACILITIES**

**ATTACHMENT A – RFP SIGNATURE AFFIDAVIT**


Humboldt County RFP # DHHS2021-06 RFP Signature Affidavit	
Name of Firm	California Forensic Medical Group (CFMG)
Street Address	3911 Sorrento Valley Boulevard
City, State, Zip	San Diego, CA 92121
Contact Person	Edward O'Bryan, MD, MBA, CPE
Telephone Number	615-312-7274
Fax Number	615-324-5798
Email	eobryan@wellpath.us

All proposals and materials submitted become the property of the County and are subject to disclosure under the Public Records Act (Government Code § 6250 *et seq.*). This Request for Proposal and all responses are considered public information, except for specifically identified trade secrets, which will be handled according to applicable state laws and regulations.

Government Code Sections 6250 *et seq.*, the "Public Records Act", defines a public record as any writing containing information relating to the conduct of public business.

In signing this proposal, I certify that this firm has not, either directly or indirectly, entered into any agreement or participated in any collusion or otherwise taken any action in restraint of free competition; that no attempt has been made to induce any other person or firm to submit or not to submit a proposal; that this proposal has been independently arrived at without collusion with any other proposer, competitor or potential competitor; that this proposal has not been knowingly disclosed prior to the opening of proposals to any other proposer or competitor; that the above statement is accurate under penalty of perjury.

The undersigned is an authorized representative of the above firm and hereby agrees to all the terms, conditions, and specifications required by the County in this Request for Proposal and declare that the proposal and pricing are in conformity therewith.

	12/2/2021
Signature	Date
Edward O'Bryan, MD	
Name (type or print)	
President CFMG	
Title	

This firm hereby acknowledges receipt / review of the following addendum(s) (if any).  
Addendum # \_\_\_\_\_ Addendum # \_\_\_\_\_ Addendum # \_\_\_\_\_ Addendum # \_\_\_\_\_

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## 4 Professional Profile

Wellpath is the premier provider of localized, high-quality, compassionate care to vulnerable patients in challenging clinical environments.

**California Forensic Medical Group (CFMG)**, an affiliated physician-owned medical service corporation, was formed in 1983 to provide physician and clinical services to county correctional facilities. CFMG engages **Wellpath as its Management Service Organization (MSO)** to manage all administrative services and programs so that our California clients benefit from the experience of Wellpath in managing correctional services. Through its collaborative MSO agreement with Wellpath, CFMG uses the administrative capabilities of Wellpath and its home offices in Nashville, Tennessee and San Diego, California.

Wellpath has been providing medical and mental health services to the Humboldt County Correctional Facility (HCCF) and the Humboldt County Juvenile Hall (JH), collectively, the Humboldt County Facilities (Facilities) for 22 years, since 1999.

CFMG will continue to be responsible for and sole provider of all medical, clinical, and patient care matters herein. Wellpath, through the MSO agreement, provides the non-clinical operational programming and administrative services.

***The name Wellpath is used throughout our response to identify the combined resources of CFMG and Wellpath.***

### Organization History

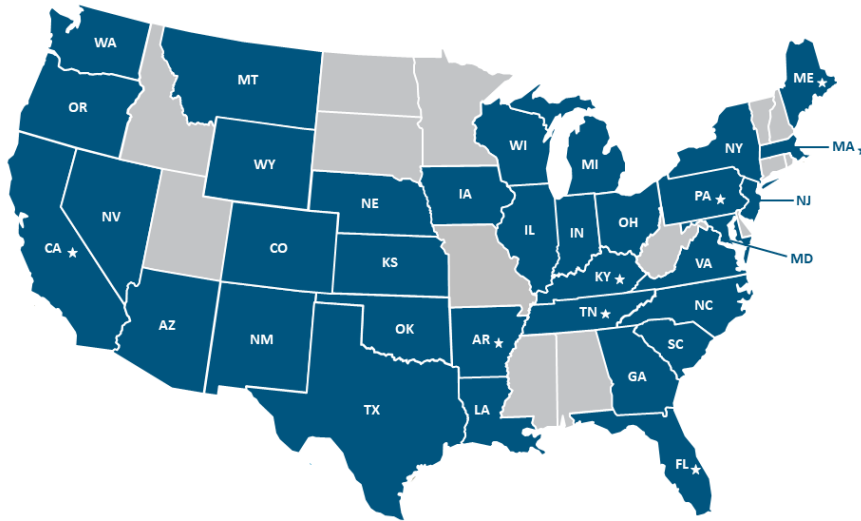
Wellpath is specifically organized to provide comprehensive correctional healthcare services to facilities similar to the Facilities, where we have provided a comprehensive healthcare program for adults and detained youth in custody since 1999. During this time, we have demonstrated the necessary capabilities and resources that make us the most qualified and willing partner for Humboldt County. You will continue to receive the excellent level of service you have come to expect from us.

Today, more than 15,000 Wellpath employees care for nearly 300,000 patients in 34 states, with more than 60,000,000 patient encounters each year. The knowledge we gain from the patients we treat throughout our client base leads to improved care at each site.

### Wellpath at a Glance

- 38 years in the industry
- Privately owned—We answer to our clients, not shareholders
- More than 15,000 Wellpath employees provide health care services for nearly 300,000 patients in 34 states
- More than 60,000,000 patient encounters each year
- Clients include state and federal prison systems, county/regional jails, detention centers, and juvenile facilities
- Annual sales = \$1.8 billion
- Financially strong and stable
- Impeccable litigation record
- 100% success in our accreditation efforts

**The Wellpath home offices in San Diego and Nashville are responsible for supporting this contract.**



**Home Office**

*Nashville, TN 37217*

**California Office**

*San Diego, California*

**Florida Office**

*Deerfield Beach, Florida*

**Pennsylvania Regional Office**

*Lemoyne, Pennsylvania*

**Maine Regional Office**

*Augusta, Maine*

**Arkansas Regional Office**

*Pine Bluff, Arkansas*

**Kentucky Regional Office**

*Louisville, Kentucky*

**Massachusetts Regional Office**

*Foxboro, Massachusetts*

**Michigan Regional Office**

*Lansing, Michigan*

**Georgia Regional Office**

*Atlanta, Georgia*

**Our Mission**

***Our mission is to provide quality care to every patient with compassion, collaboration, and innovation.***

We are a true solutions provider in the healthcare industry and in the communities we serve. Our constant focus on patient care will continue to deliver innovative solutions to meet your program objectives and local, state, and national standards of care.

**Our Vision**

***Our vision is to transform healthcare by delivering hope and healing through public health partnerships.*** Wellpath was born from the joining of two great companies that shared the importance of putting patients first and providing high-quality care to an often-overlooked population. We believe in transforming public health by delivering hope and healing to those who need it most. We treat our patients with dignity and compassion because we care about them as human beings. We are the right people, striving to do the right thing while creating healthier communities—one patient at a time.

“When you think about our patients, they tend to be the most underserved, and I think there is no greater calling than to work with and to care for those people who have historically been left out and received the least healthcare.”

Jorge Dominicus,  
Wellpath CEO


## Our Focus


**Our philosophy is simple: we listen to our clients; we assess the situation, and we offer targeted implementable solutions.** Wellpath concentrates on establishing partnerships with county, state, and federal agencies experiencing challenges meeting their healthcare delivery needs in a fiscally responsible way. We focus on creating and maintaining successful partnerships with our clients and we create value in our partnerships through long-term cost savings and improved patient care. Our focus is best summarized by what we call **The Five Ps: Patients, People, Partners, Processes, and Performance.**


## Our Values


Wellpath recruits and retains only the best personnel in the industry. We strive to hire individuals who possess the qualities that we value most in ourselves, our employees, and in others. These attributes are known by the Wellpath family as **The Five Hs: Humility, Honesty, Hunger, Hard Work, and Humor.**


Our focus  
**THE FIVE Ps**

- 


**PATIENTS**  
We consider patients' needs and outcomes **FIRST** in all decisions we make.
- 

**PEOPLE**  
We value our patients, patients' families, staff and all stakeholders.
- 

**PARTNERS**  
We strive to meet all deliverables as contracted and provide our partners with the best services.
- 

**PROCESSES**  
We believe that constant adherence to best practices leads to successful outcomes.
- 

**PERFORMANCE**  
We strive to perform above expectations in all areas of our business.

Always Do the Right Thing!


Our values  
**THE FIVE Hs**

- 

**HUMILITY**  
A mindset that ensures we never lose sight of our identity and our loyalty to those we serve and support.
- 

**HONESTY**  
A commitment to the highest level of personal and professional integrity with our partners and our patients.
- 

**HUNGER**  
A desire for all personnel to learn, teach and grow in a team-supported environment.
- 































**HARD WORK**  
A fundamental willingness to work harder and smarter in the interest of providing better service to our partners and patients.
- 

**HUMOR**  
A stress reliever that is essential for maintaining a positive, passionate attitude and a superior quality of life at work.

Always Do the Right Thing!


## Our Services

Wellpath provides a wide range of healthcare services and ancillary services for our clients, including:

 <b>Comprehensive Medical Services</b>	 <b>Mental &amp; Behavioral Health Services</b>	 <b>Administrative &amp; Operational Services</b>
<ul style="list-style-type: none"> <li> <b>Assessments &amp; Appraisals</b> <i>Receiving screenings; health assessments</i></li> <li> <b>Access to Care</b> <i>Triage &amp; sick call; on-site clinics; telemedicine; eConsults</i></li> <li> <b>Off-site Coordination</b> <i>Emergency &amp; hospitalization arrangements; case management</i></li> <li> <b>Education</b> <i>Patient health education programs; correctional staff training programs</i></li> <li> <b>National Contracts</b> <i>Pharmacy; laboratory; radiology</i></li> <li> <b>Substance Use Disorder Treatment</b> <i>Medically supervised withdrawal management; Medication Assisted Treatment (MAT)</i></li> <li> <b>Medically Necessary Diet Programs</b></li> <li> <b>Dental Care</b></li> <li> <b>Optical Care</b></li> </ul>	<ul style="list-style-type: none"> <li> <b>Screening, Assessment &amp; Evaluation</b></li> <li> <b>Treatment Planning</b></li> <li> <b>Consultation &amp; Education</b></li> <li> <b>Multidisciplinary Treatment Teams</b></li> <li> <b>Group and Individual Therapy</b></li> <li> <b>Clinical Supervision</b></li> <li> <b>Telepsychiatry</b></li> <li> <b>Suicide Prevention &amp; Intervention</b></li> <li> <b>Jail-Based Competency Treatment</b></li> <li> <b>Re-entry and Discharge Planning</b></li> <li> <b>Community Outreach</b> <i>Continuity of care &amp; discharge planning; collaboration with community agencies</i></li> </ul>	<ul style="list-style-type: none"> <li> <b>Claims Management</b> <i>Third-party billing; cost recovery programs; catastrophic re-insurance coverage</i></li> <li> <b>Utilization Management</b> <i>Web-based Care Management system</i></li> <li> <b>Electronic Record Management Application (ERMA®)</b> <i>EMR &amp; eMAR technology built for corrections</i></li> <li> <b>Network Development</b> <i>Established networks of specialty providers &amp; hospitals; negotiating agreements for clients</i></li> <li> <b>Accreditation</b> <i>NCCHC; ACA; CALEA; state-specific</i></li> <li> <b>Clinical Quality Assurance</b> <i>Continuous Quality Improvement (CQI) &amp; Medical Administration Committee (MAC) programs</i></li> <li> <b>Reporting and Accountability</b> <i>Automated reports; compliance tracking</i></li> </ul>

## Our Core Competencies

Wellpath will continue to maintain a mutually beneficial partnership with Humboldt County based on the continued communication that creates cost savings and helps you meet your program objectives.

### Hands-on Approach

The Wellpath executive team is closely involved with the delivery of services for our clients. Continuous communication helps minimize surprises and ensures a mutual understanding of decisions and protocols.

“Wellpath’s professional, administrative and clinical skills come ‘packaged’ in a sincere, witty and caring manner. Our relationship continues as a direct result of Wellpath’s flexibility, humility and their committed reputation as an outstanding correctional healthcare provider.”

Thomas C. Havel, Warden  
San Juan County, NM

### Employee Advocates

Our employees are our most valued assets, and we equip them with the tools to succeed. We provide our site leaders with management training to foster the proper culture for working and succeeding in a challenging environment.

**To be the company that clients want to work *with*,  
we must be the company that employees want to work *for*.**

### The Wellpath Healthcare Cloud

The Wellpath Healthcare Cloud is a revolutionary and proprietary telehealth platform specifically designed to provide patients specialized clinical expertise in the shortest amount of time possible. Available across the country in a variety of challenging environments, including jails, prisons, hospitals, and residential treatment facilities, the Wellpath Healthcare Cloud provides real-time emergent and specialty care through a technologically sophisticated telehealth platform.



### Advanced Utilization Management

The Wellpath Care Management system is a component of **Wellpath Connect**. Our Care Management system is in place at the Humboldt County Facilities is a browser-based web application that allows us to track off-site care, ensure a timely return to the facility, manage claims, and provide reports to assist with cost containment and budget preparation. Our Care Management system functions alongside your Jail Management System, OMS, to create added clinical control and cost efficiencies for on-site and off-site medical and dental activities.



### Superior Technology

We implemented the CorEMR electronic medical record system at the Humboldt County Facilities. Wellpath has integrated CorEMR with direct links to our Care Management system and interfaced CorEMR with Correct Rx, our pharmacy provider.



### Proven Success Managing Chronic Care

Wellpath has established many on-site programs and specialty care clinics for Humboldt County. Our continued focus on the identification, referral, and treatment of patients with chronic conditions allows us to manage patient needs before they can escalate and require off-site consultation or result in grievances or litigation.



### Cost Containment

Our objective is to uncover all areas of savings for our clients without sacrificing quality. Wellpath negotiates contracts for goods and services and seeks efficiencies in staffing, pharmacy, and off-site costs. Our national vendor contracts offer economies of scale that create savings we pass on to our clients. Because we provide healthcare for nearly 300,000 patients nationwide, we have significant buying and negotiating power, which allows us to secure the best possible rates with on-site and off-site providers.



### Registration in the State of California

CFMG and its Management Service Organization, Wellpath, are both registered with the California Secretary of State and in good standing. Certificates of Status for both CFMG and Wellpath have been provided in [Section 9](#).

## 4.1 Experience

Wellpath is the industry leader in designing and operating healthcare programs in facilities similar to the Facilities. The significant difference between Wellpath and our competitors is our proven history of success managing projects similar in scope and mission as required by the RFP.

Wellpath has provided healthcare services for 38 years since 1983, with nearly 300 current client partners. We have developed proven best practices for these sites that translates to continued success in Humboldt County.

Wellpath has been providing correctional healthcare services to the Facilities for 22 years, since 1999. Given the opportunity to continue our partnership with the County, we will provide the same dedicated level of service and collaboration that you have come to expect from CFMG and Wellpath.

### *Experience in the State of California*

CFMG/Wellpath has provided comprehensive healthcare services in the State of California for nearly four decades, beginning with our contract with Monterey County in 1984. Today, nearly 2,000 CFMG/Wellpath employees serve our California clients. We are fully aware of all requirements to satisfy the tenets of the scope of practice nuances specific to the State of California, as well as state and local laws, rules, and regulations. **Wellpath has a Home Office in San Diego**, and Wellpath President, Kip Hallman, is a nearly 40-year resident of San Diego.



As the medical provider for nearly 25,000 patients in 86 jail, prison, and mental health facilities throughout the State of California, Wellpath already has a stable, knowledgeable management team in place, along with California-licensed staff who support our operations in Humboldt County.

Wellpath currently cares for more than 22,000 adult and juvenile patients in local detention/jail facilities in 34\* California counties. We also provide **Jail Based Competency Treatment (JBCT)** services in Humboldt County and for many of our California clients, as indicated in the following list:



- Alameda County (2016)
- Amador County (1999)
- Butte County (2002) †
- Calaveras County (1999)
- Colusa County (2000)
- El Dorado County (1996)
- Fresno County (2018)
- Glenn County (2009)
- **Humboldt County (1999)†**
- Imperial County (1995)
- Kings County (2020)\*
- Lake County (1996)
- Lassen County (2015)
- Madera County (2009)
- Merced County (1997)
- Monterey County (1984) †
- Napa County (2000)
- Nevada County (1992)
- Placer County (1988) †
- San Benito County (2004)
- San Diego County (1999)
- San Luis Obispo County (2019) †
- Santa Barbara County (2017)\*
- Santa Cruz County (2012)
- Shasta County (2008) †
- Solano County (2004) †
- Sonoma County (2000) †
- Stanislaus County (1993) †
- Sutter County (2017)
- Tulare County (2018)
- Tuolumne County (1999)
- Ventura County (1987) †
- Yolo County (1990)
- Yuba County (2017)

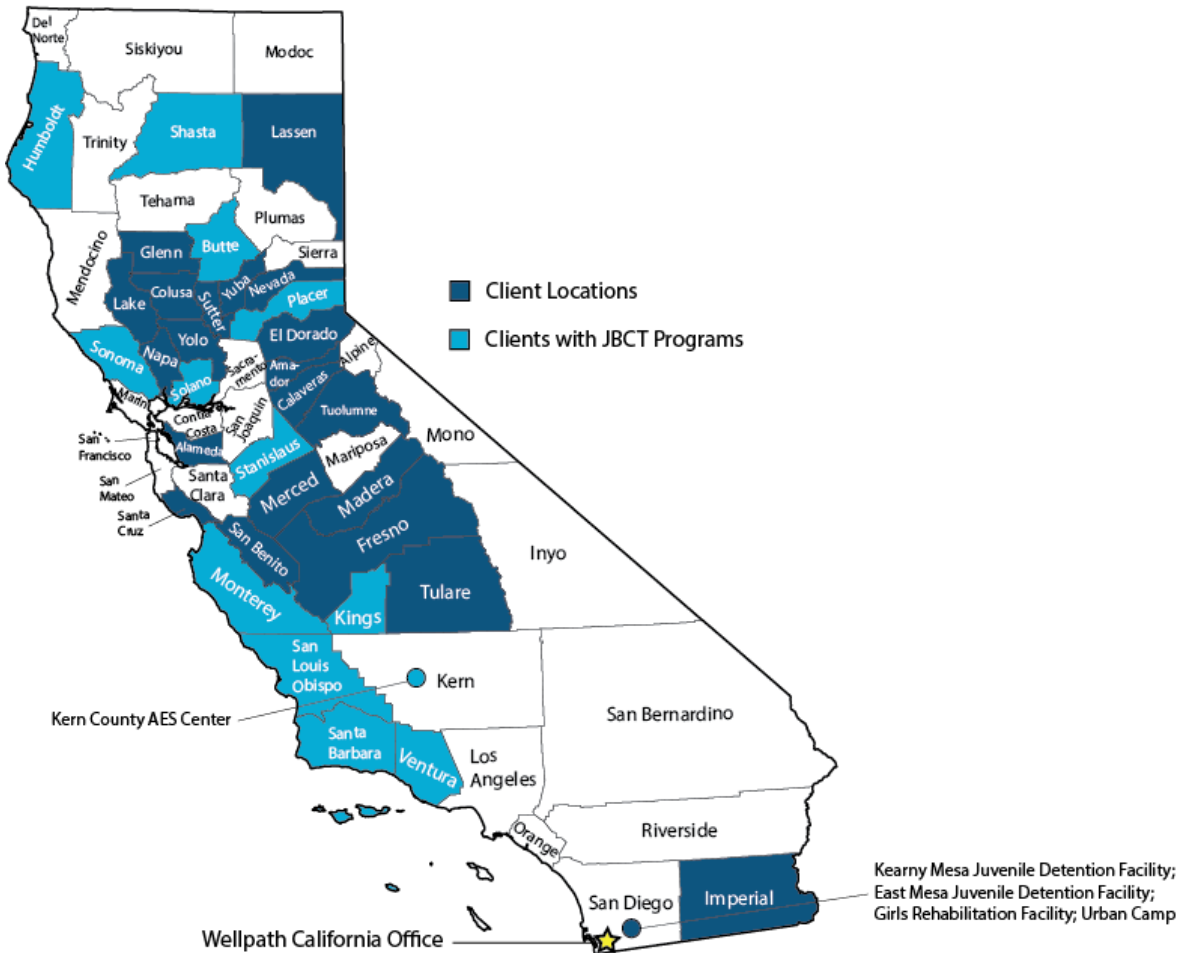
† **Clients with JBCT programs**

In 2018, Wellpath began providing jail-based competency restoration services at the 60-bed Kern County Admissions, Evaluation, and Stabilization (AES) Center. We are responsible for providing comprehensive medical, dental, and mental health services for the patients housed in the AES Center as they undergo programming to restore competency.

### Years in Business

The Wellpath family of companies formed in October 2018 when affiliates of Correct Care Solutions, LLC (CCS) and Correctional Medical Group Companies, Inc. (CMGC) combined to form one company business. CCS (now known as Wellpath LLC) was founded in 2003 and has 18 years of experience administering correctional healthcare programs; CMGC was founded in 1983 and has 38 years of experience administering correctional healthcare programs.

**No other company has the level of experience and resources in California to support the needs of the Facilities.**



## ***CFMG / Wellpath Successes and Achievements in Humboldt County***

We are proud of the successes and accomplishments achieved at the Facilities since 1999. During this period, we have proven that we are not only your healthcare provider but also your partner, working side-by-side and collaborating on projects that benefit the County. Below are highlights of initiatives and achievements that illustrate our continued commitment to Humboldt County and our healthcare program:

- We implemented a customized CorEMR electronic medical record system and CorEMR electronic Medication Administration Record (eMAR).
- We implemented our Care Management system to manage off-site health services.
- We passed all CCR Title 15 audits during our 22-year tenure.
- We managed and mitigated the COVID-19 pandemic at the site; patients testing positive have been treated on site; there have been no inpatient hospitalizations due to COVID.

## ***Juvenile Experience***

Wellpath manages combined adult and juvenile programs, as well as standalone juvenile programs, for many of our clients. We provide comprehensive medical and mental health services to incarcerated juveniles across the country. Our experience assessing and treating this young and developing population gives us the expertise to offer care unique to juveniles rather than treating them like adult offenders.

Wellpath and our affiliated companies have provided comprehensive juvenile healthcare services for more than 30 years. We currently care for nearly 5,000 juveniles across more than 70 facilities nationwide, including statewide juvenile systems in Louisiana, Maine, and Illinois. Our programs in these facilities include the design and successful operation of medical, dental, and mental health programs for juveniles. We have succeeded in attaining NCCCHC or ACA accreditation for juvenile operations when requested. In Louisiana, we worked with the Office of Juvenile Justice to ensure first-time ACA accreditation of their medical programs.

“Today, Wellpath is still our valued partner and provides care to 330 juveniles in the custody of the OJJ. During the course of our partnership, we have carried out program improvements that include first-time accreditation by the American Correctional Association (ACA) and implementation of technology resources such as [their] Electronic Record Management Application (ERMA) and electronic Medication Administration Record (eMAR).”

Denise Dandridge, Director of Health Services  
Louisiana Office of Juvenile Justice

Wellpath provides primary and preventative care, sick call and episodic care, acute and chronic medical treatment, and follow-up care for juveniles. Our health programs are based on documented policies and procedures addressing the provision of juvenile health services, including:

- Assessment and evaluation
- Suicide prevention
- Special needs treatment plans
- Referrals



- Ongoing care
- Youth-specific health education
- Discharge planning from day one

Wellpath understands the distinctive needs related to caring for our young patients. This patient group is still developing and growing both physically and mentally, which can present challenges while in custody. Our experience working with this special population is essential to appropriately assessing and treating their healthcare needs.

Wellpath has three juvenile specialists, **Amisha Robillard, DNP, MHA, RN**, **Rashied Cormier, LCSW-BACS**, and **Pam Poole, RN**, who are valuable resources on juvenile policy and procedural matters, juvenile-specific education and programming, and orientation focused on our juvenile patients. Dr. Robillard has 20 years nursing experience, seven years in corrections. Mr. Cormier brings more than 14 years of correctional healthcare experience working with juveniles in statewide settings, while Ms. Poole has more than 17 years of nursing experience in adult, juvenile, and federal correctional facilities.

### **Accreditation Experience**

The Wellpath program for Humboldt County meets or exceeds community standards of care, as well as standards established by the National Commission on Correctional Health Care (NCCHC), American Correctional Association (ACA), and California Code of Regulations (CCR) Title 15. Wellpath will continue to ensure that the Humboldt County Facilities achieve and maintains full compliance with applicable NCCHC and CCR Title 15 standards. We have extensive experience achieving and maintaining NCCHC and ACA accreditation.

Our accreditation history is well-documented: ***Wellpath has neither failed to obtain nor lost medical accreditation at any of our client sites.*** We conduct mock accreditation surveys before an actual on-site audit and discuss our findings and recommendations with the on-site staff. Additionally, our internal quality improvement programs ensure you meet and maintain the applicable standards.

#### **Praise for Wellpath NCCHC Audit**

“I wanted to take the opportunity to let you know what a great job your HSA did in preparing for and handling the recent NCCHC audit! Both during my personal interview and during the exit interview, both of the auditors had nothing but the highest praise for your HSA and her staff and the medical services your company provides. While this facility has maintained that accreditation for over 30 years, **we have never partnered with better company than yours.** It takes me back to the day we interviewed you for the initial RFP and the pledge you made and you stood by ever since. Thank you.”

Jail Administrator at a Wellpath Client Site

## Client Accreditation Status

Wellpath currently provides healthcare services for **198 facilities** accredited by the NCCHC and/or ACA. The following table summarizes our current accreditation status.

Wellpath National Accreditations by the Numbers	
Accrediting Agency	Number of Facilities
NCCHC, ACA & CALEA (Triple Crown)	20
NCCHC & ACA	24
NCCHC Only	54
ACA Only	100
<b>TOTAL</b>	<b>198</b>

Wellpath has enjoyed unparalleled success in our accreditation experience. Many Wellpath sites have been found 100% compliant during their accreditation surveys. Furthermore, ***we carry the distinction of counting 20 Triple Crown facilities among our clients.*** The National Sheriffs' Association (NSA) presents its prestigious Triple Crown Award to correctional facilities that achieve accreditation by the NCCHC, ACA, and CALEA.

According to the NSA, "Achieving these accreditations individually is a daunting task. Acquiring all three at the same time is an extraordinary feat. The Triple Crown distinction is so rare, that since the establishment of the award in 1993, fewer than 100 sheriffs' offices have qualified."



Wellpath manages Triple Crown facilities in:

- Alameda County, CA
- Alexandria, VA
- Arapahoe County, CO
- Augusta-Richmond County, GA
- Broward County, FL (*5 Triple Crown facilities*)
- Charleston County, SC
- DeKalb County, GA
- Elkhart County, IN
- Jefferson County, CO
- Marion County, IN
- McHenry County, IL
- Monroe County, FL
- New Hanover County, NC
- Orange County, NY
- Shelby County, TN (*2 Triple Crown facilities*)

## NCCHC Awards

Each year, the NCCHC presents its Program of the Year Award to one standout program among thousands of accredited jails, prisons, and juvenile facilities. Two Wellpath facilities have received this prestigious award. The long-term care program at the Columbia Regional Care Center in South Carolina, which is managed by our Recovery Solutions Division, was recognized in 2012 for the exceptional quality of care provided for seriously medically and mentally ill patients.

We received the award again in 2017, when Wellpath's team at the Westchester County Correctional Facility in Valhalla, New York, had the vision to provide additional services to our mental health

patients. Health Services Administrator Alexis Gendell, PsyD, and her Wellpath team at WCCF worked directly with the Westchester County Department of Correction and community providers to make this vision a reality. The resulting Community Oriented Re-Entry (CORE) Program was recognized by the NCCHC as its 2017 Program of the Year.

The NCCHC also selects a Facility of the Year from among the nearly 500 accredited jails, prisons, and juvenile facilities. A Wellpath site was named Facility of the Year in 2012 when the NCCHC recognized the professional delivery of Wellpath-managed healthcare services at the Chittenden Regional Correctional Facility in Vermont.

### Unique Accreditation Perspective

Wellpath has a unique perspective on the accreditation process due to our employees' participation in the following NCCHC activities:

- Standards development
- Standards interpretation
- On-site accreditation surveys
- Training NCCHC lead surveyors
- Hosting and conducting Certified Correctional Health Professional (CCHP) exams to encourage advancement and professional certification of our employees

We typically send more than 50 staff members to the annual NCCHC conference each year for training. Wellpath staff members regularly serve as presenters and educational session leaders at the conference. We host CCHP examinations regularly at our Home Office in Nashville, Tennessee, and at various locations throughout the country for the convenience of our employees taking the exam.

Wellpath is also proud to include ACA Past President Daron Hall (Sheriff for Davidson County, Tennessee, and former NSA president) among our clients.

#### ACA Past President Endorses Wellpath

“As advertised, your organization has been extremely responsive to our needs and **the proactive manner in which you operate is in stark contrast to our previous provider**...While I have been extremely impressed with [your] responsiveness, I have been even more impressed with the level of excitement and enthusiasm which has been instilled in your line staff. This is refreshing! It gives me great comfort to know that your staff respects your organization and its commitment to quality.”

Sheriff Daron Hall, ACA Past President  
Davidson County, TN

### NCCHC and ACA Certification

Wellpath encourages our medical professionals to obtain certification through the NCCHC and ACA. Becoming a Certified Correctional Health Professional (CCHP) through the NCCHC and a Certified Correctional Nurse Manager (CCN-M) through the ACA offer immeasurable benefits. These certifications are steps toward increased



knowledge, greater professional recognition, and identification as a leader in the complex and ever-changing field of correctional healthcare.

Health professionals working in correctional settings face unique challenges, including working within strict security regulations, dealing with crowded facilities, and understanding the complex legal and public health considerations of providing care to incarcerated populations. Achieving professional certification ensures the skills to meet these challenges. Wellpath reimburses testing fees for employees receiving certification.

### ***Obtaining First-time Accreditation***

Wellpath has extensive experience achieving and maintaining NCCHC accreditation, and we will ensure that the Facilities' medical program obtains NCCHC accreditation as required by the RFP. **We have neither failed to obtain nor lost medical accreditation at any of our client sites.**

Progress toward accreditation goals will be reported and discussed at each MAC meeting. Wellpath staff will attend accreditation meetings and assist facility staff in preparing for the initial NCCHC survey. We will also assist with periodic internal compliance audits and maintain future ongoing accreditation.

Wellpath has already begun preparations at the Facilities for accreditation. Our Directors of Compliance and Accreditation, Mark King and Patty Craig, have been interacting and preparing the Facilities for NCCHC and will be doing an on-site review and mock audit at the beginning of 2022.

We have obtained first-time accreditation at numerous client facilities, including:

- New Hanover County Detention Facility, NC – NCCHC and ACA
- Shelby County Jail and Jail East, TN – NCCHC and ACA
- Durham County Detention Facility, NC – NCCHC and ACA
- Milwaukee County Jail and House of Correction, WI – NCCHC
- Fresno County Main Jail and Juvenile Justice Campus, CA – NCCHC
- Newport News City Jail, VA – NCCHC
- Pasco Sheriff's Office Detention Center, FL – NCCHC
- Santa Barbara County, CA – NCCHC
- Waukesha County Jail, WI – NCCHC
- Augusta-Richmond Charles B. Webster Detention Center, GA – ACA
- Douglas County Correctional Center, NE – ACA
- Elkhart County Corrections Center, IN – ACA
- Hudson County Correctional and Rehabilitation Center, NJ – ACA
- Louisiana Office of Juvenile Justice – ACA
- McHenry County Jail, IL – ACA
- Richland County Alvin S. Glenn Detention Center, SC – ACA
- Western Virginia Regional Jail, VA – ACA
- Wyandotte County Juvenile Detention Center, KS – ACA

For facilities where Wellpath was responsible for obtaining accreditation, the average length of time between the application and the first successful audit has been 12 months or less. We obtained accreditation within six months at several sites, including the Douglas County Correctional Center in Nebraska, and the Western Virginia Regional Jail. Wellpath has also maintained accreditation at every site that received initial accreditation through another provider, participating in successful re-accreditation audits following the accrediting agency's audit cycle.

### ***Current and Former Contracts***

CFMG and Wellpath combined have more than 400 government agencies where we provide services similar to the requirements presented in your RFP. In many of the facilities where we provide healthcare, we also provide mental health services for both adult and juveniles. We have provided our comprehensive client list with detailed contract information in **Tabbed Attachment A**. This information is **CONFIDENTIAL AND PROPRIETARY**.

### **Former Clients**

Wellpath has responsibly completed all projects under which we have been contracted. Where a contract exit was made before the original concluding date, we have worked diligently to ensure a transition to the new service provider. We recognize our responsibility to patient care in any such transition, and we faithfully perform to meet that commitment.

In **Tabbed Attachment B**, we have provided a list of inactive contracts with explanations as to why each contract ended. This information is **CONFIDENTIAL AND PROPRIETARY**. Some contracts that terminated early were acquired with the purchase of other companies. The reasons for terminations typically and historically have revolved around smaller contracts that we elected to discontinue due to unacceptable risk. In every case, we exited under the contract terms.

### ***Wellpath Site Leadership Team***

Wellpath delivers our healthcare program for the Humboldt County Facilities by a team of qualified and credentialed personnel, supported by our experienced Regional Management team and corporate support from our Home Offices. Following is our site leadership in the key positions at the Facilities:

- **Medical Program Manager / Health Services Administrator (HSA): Karen Edmundson, RN**  
Ms. Edmundson is an experienced RN in corrections and has worked for CFMG/Wellpath at the Humboldt County Detention Facilities for over 6 years. Ms. Edmundson serves as our Program Manager/HSA and is the designated Health Authority for the Detention Facilities.
- **Medical Director (Physician): Daniel Ziegler, MD**  
Dr. Ziegler is our designated Responsible Physician for clinical services. Dr. Ziegler provides clinical oversight of the medical program, performs provider sick call, and conducts chronic care clinics. He also provides 24/7 on call services.
- **Charge Nurse: Janelle Harris, ARNP**  
Ms. Harris is a Registered Nurse and Charge Nurse. She is on site at the HCJH with responsibility for the Wellpath program for detained youth. Ms. Harris has been with CFMG/Wellpath for three years.

As your incumbent provider, our healthcare staff will remain in place, and there will be no disruption of services or staffing turnover that typically occurs as a result of a transition to a new provider.

### Regional Management Team

Our experienced Regional Management Team will continue to strengthen communication and operational workflows in the Wellpath program at the Humboldt County Facilities. This team is familiar with California-specific requirements and ensures a compliant program that meets your needs and expectations.

Our program for Humboldt County is directly supported by our Regional Management Team and our Home Offices in San Diego, California, and Nashville, Tennessee. **Regional Director of Operations, David Garzoli**, visits the Humboldt County Facilities regularly, at a minimum monthly, to evaluate medical processes and meet with the administration.

Please see below for brief bios of our Regional Management Team.



***Damon Kinton – Regional Vice President of Northern California***

Mr. Kinton joined Wellpath as the Regional Vice President of Northern California in 2021. In this role, he provides leadership serving four Region Directors of Operations and 34 Health Services Administrators at 54 client sites across California, Oregon, and Washington. Before joining Wellpath, he spent five years with DaVita Healthcare as a Director providing P&L leadership. ***Mr. Kinton resides in California.***



***David Garzoli – Regional Director of Operations***

Mr. Garzoli joined Wellpath in 2020 as a Regional Director of Operations. In this role, he provides leadership and direction in all aspects of the following areas: personnel management, client management, clinical quality management, and operations management for jails in the Northern California region. Mr. Garzoli works closely with the Health Services Administrators at multiple locations to ensure a high level of care at responsible costs. Before joining Wellpath, he spent more than two decades as County Jail Commander, where he was responsible for medical services and logistics, and as the Enforcement Division Supervisor, where he supervised field operations. He also served as a deputy sheriff and supervisor. Mr. Garzoli served in the U.S. Army. Among his duties was guarding the East-West German border. ***He resides in California.***



***Vivek Shah, MD, CCHP – Regional Medical Director***

Dr. Shah joined Wellpath in 2006 as a Regional Medical Director and provides clinical management and oversight to our contracted facilities in the Northwest region. Before joining Wellpath, he spent six years in group internal medicine practices in the states of Washington and Kentucky. Dr. Shah is affiliated with the American Medical Association, the American College of Physicians, and the Society of Correctional Physicians. After completing his medical education in India, he completed his primary care internal medicine residency at Mt. Sinai School of Medicine in New York.

### *Program Oversight*

Our leadership team ensures that our programming follows the tenets of the contract between the County and CFMG/Wellpath, as well as Wellpath protocols and industry standards. Clinical oversight is provided by the site **Medical Director, Dr. Ziegler**, who reports directly to our **Regional Medical Director, Vivek Shah, MD**. Operational oversight is the responsibility of **Regional Director of Operations, David Garzoli**, who reports directly to **Regional Vice President, Damon Kinton**.

**C.J. Whitfield, Director of Partner Services**, works in conjunction with **Kelly Pribble, Vice President of Partner Services**, and serves as the Wellpath liaison to the County for all aspects of the contract to ensure your continued satisfaction with our service. Our **Executive Vice President of Local Government Healthcare (West), Justin Searle**, and **Group Vice President of Partnership Development (West), Patrick Turner**.

### *Wellpath Corporate leadership*

The Wellpath corporate leadership team provides support and is available as needed.

- **Chief Executive Officer:** Jorge Dominicis
- **President, Wellpath:** Kip Hallman (*California resident*)
- **Executive Vice President & Chief Legal Officer:** Marc Goldstone
- **Chief Operating Officer:** Ben Slocum
- **Chief Financial Officer:** Juan Perez
- **President, Local Government Healthcare Division:** Cindy Watson
- **Executive Vice President of Local Government Healthcare (West):** Justin Searle
- **President of California Forensic Medical Group (CFMG):** Edward O'Bryan, MD, CCHP
- **Chief Clinical Officer:** Thomas Pangburn, MD
- **Associate Clinical Officer & Executive Vice President of Medical Affairs:** Edward O'Bryan, MD
- **Senior Vice President and Chief Information Officer:** Bob Martin
- **Chief Nursing Officer:** Heather Norman, MN, RN, NE-BC, CNL
- **Chief Human Resources Officer:** Ann Hatcher
- **Group Vice President, Partnership Services:** Patrick Turner
- **Vice President, Partner Services:** Kelly Pribble, RN, CCHP, MSM, MOL
- **Director of Partner Services:** C.J. Whitfield, MPH

### *Home Office Support*

The Wellpath Home Offices in San Diego, California and Nashville, Tennessee, directly support our on-site medical and administrative staff at the Humboldt County Facilities. Our Home Office support includes a staff of HR professionals to guide all recruiting and hiring, as well as leadership development and clinical education teams to train new and current staff members. Our finance and accounting teams provide regular and thorough reporting, and our IT department ensures that our technology meets the Humboldt County Facilities' needs and requires minimal resources.

## **Litigation**

CFMG's litigation history is modest given today's litigious environment and the size of our business, which is directly reflective of the high standard of care we provide and the emphasis we place on quality care and effective risk management. Our collaborative and cross-functional team approach proactively identifies areas of risk before they can develop into serious problems, then work to eliminate and minimize those risks. This, coupled with **stringent quality assurance and patient safety programs, enables CFMG and Humboldt County to mitigate negative outcomes and avoid costly litigation.** We view this as a major differentiator between CFMG and other companies in our industry.

Litigation in the governmental healthcare industry is common, as it is in non-governmental healthcare businesses. As one of California's largest providers of correctional healthcare, we believe our litigation history compares favorably and is indicative of the high quality of our services. A 2015 article published in the *UC Irvine Law Review* reported that an average of 10 federal civil rights lawsuits are filed each year per 1,000 inmates; **Wellpath's litigation frequency falls well below this average.**

CFMG has strong relationships with experienced defense counsel in the jurisdictions where we operate, as well as an in-house team of experienced claims managers, who partner to defend claims related to the provision of healthcare services.

Our dedicated healthcare providers focus daily on quickly assessing and treating our patients under incredibly difficult circumstances. Our robust continuous quality improvement program and our membership in a national patient safety organization help us reduce and mitigate adverse patient outcomes. According to a study of malpractice lawsuits against traditional hospital emergency departments, nearly one-third (32%) involved a payment by the provider, more than triple the rate of settlement payments in lawsuits against CFMG.

CFMG has no pending judicial or administrative proceedings material to our business or financial condition or our ability to continue performing our work for Humboldt County. The financial and other terms of settled lawsuits are generally subject in most states to legally binding, bilateral confidentiality agreements and cannot be disclosed.

We have provided the requested represented litigation history for our Local Government detention facilities in **Tabbed Attachment C**. This information is **CONFIDENTIAL AND PROPRIETARY**.

## **Controlling Interest**

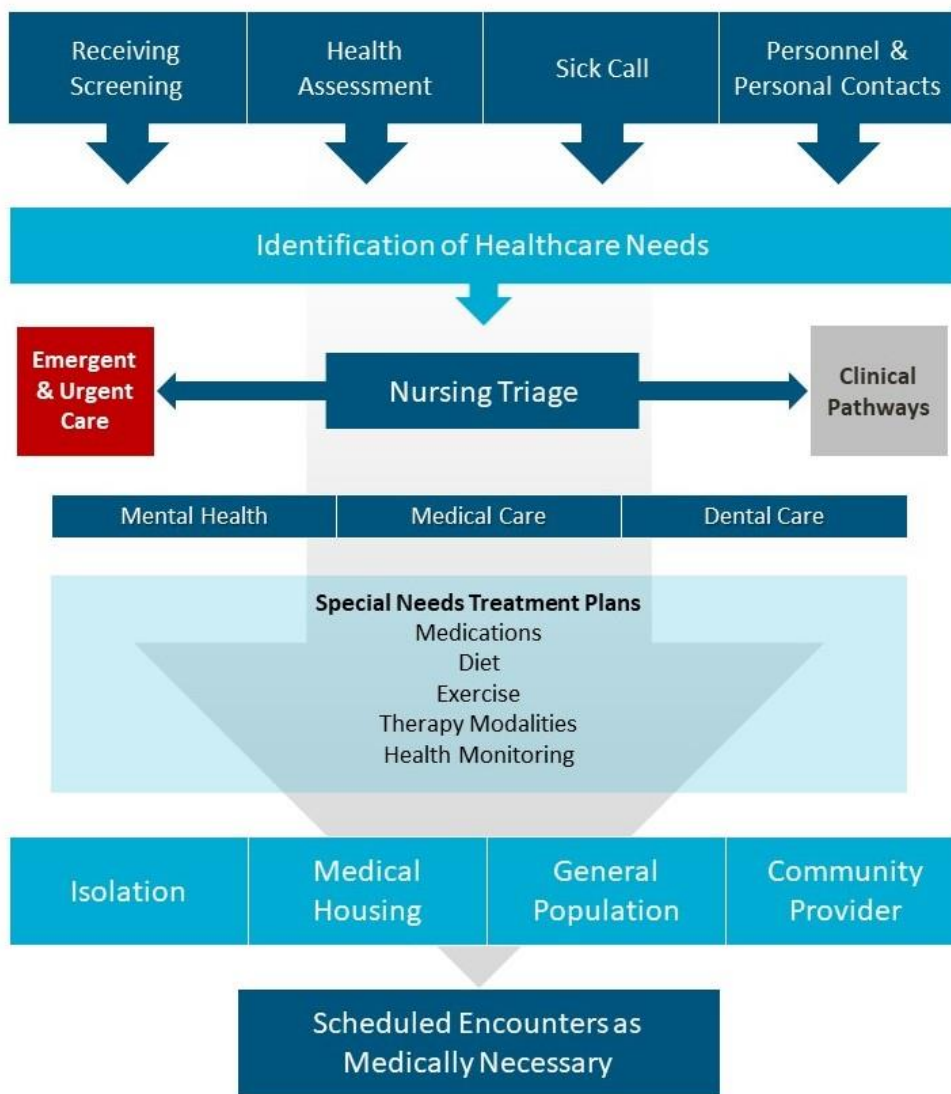
California Forensic Medical Group, Inc. ("CFMG") is a California professional corporation, owned and operated by California-licensed physicians. CFMG does not hold a controlling or financial interest in any other organizations.



## 5 Program Description

Wellpath will continue to provide a healthcare delivery system specifically tailored to Humboldt County’s requirements. Our managed care system promotes efficiency and reduces cost by eliminating unnecessary services and encouraging preventive health measures at the Facilities. Wellpath staff are responsible for identifying patient healthcare needs and scheduling appropriate treatment, as well as coordinating emergency and nonemergency on-site and off-site medical services.

### The Wellpath Healthcare Delivery Process



### Written Healthcare Plan

Wellpath has in place a written healthcare plan with clear objectives and site-specific policies and procedures for the Facilities. Our ongoing goal is to reduce risk for the County, avoid unnecessary transportation and security costs for off-site care, and lower litigation claims and grievances while improving patient care. Our significant experience in these areas at the Facilities and in facilities nationwide helps us achieve these benchmarks in Humboldt County.

## **Standards of Care**

Wellpath performs its obligations in compliance with all applicable local, State of California, and federal laws, rules, regulations, and orders. Our program for Humboldt County will continue to meet or exceed community standards of care, as well as standards established by the National Commission on Correctional Health Care (NCCCHC) and the American Correctional Association (ACA). We operate all of our programs at an appropriate level of care consistent with national standards for correctional healthcare. Our internal quality improvement programs guarantee that all Wellpath clients meet or exceed these standards.

## **Humane Treatment**

Wellpath provides inmates and detained youth at the Facilities with healthcare services consistent with care available in the community. Our focus is operating a humane, legally defensible healthcare program for the County. While acknowledging our responsibility to avoid unnecessary costs, we also ensure that patients receive the most appropriate care. We believe each decision related to a patient's care should include asking ourselves, *"What if this was my family member?"*

Wellpath strives to provide care consistent with an inmate patient's rights under the U.S. Constitution and our philosophy related to the care of, specifically that incarcerated individuals have a right to:

- Access healthcare services
- Professional medical judgment
- Care that has been ordered

We stress humane and respectful patient treatment in everything we do. Our employee handbook describes our company values, including treating our people with respect and dignity. Wellpath provides ethics training that teaches nursing personnel how to uphold that respect and dignity.

## **Nursing Services**

Wellpath will continue to provide appropriate nursing coverage for contracted services at the Facilities, including receiving screenings, health assessments, medication administration, sick call triage and follow-up, emergency response, physician assistance, and other healthcare functions as applicable. Nurses fully qualified and appropriately licensed, certified, or registered in the State of California provide healthcare services.

## **5.1 Receiving Screening**

Wellpath staff screen arrestees and youth on their arrival at the HCCF and HCJH, respectively, for emergent or urgent health needs. Our receiving screenings emphasize the identification, referral, and treatment of individuals with acute and chronic healthcare conditions, behavioral health disorders, suicide risk, withdrawal risk, and dental issues. We assess the need for medication, isolation, or close observation. This receiving screening sets the course for the patient's medical care throughout confinement. Early identification of problems using a systematic intake evaluation prevents more serious and costly problems from developing later.

Wellpath understands the importance of a timely and proper booking and admission screening process to promote individual and facility well-being. We provide staffing to ensure timely evaluation of intake orders and stabilize patients with health issues as quickly as possible and initiate needed medications.

We allocate properly trained RNs, LVNs, and authorized healthcare staff to conduct receiving screenings 24 hours a day, seven days a week, including holidays.

Wellpath receiving screenings meet NCCHC and CCR Title 15 standards and minimally include:

Direct visual observation:

- Abnormal appearance (e.g., sweating, tremors, anxiety, disheveled, signs of trauma or abuse)
- Restricted or compromised movement (e.g., body deformities, physical abnormality, unsteady gait, cast or splint)
- Abnormal breathing or persistent cough
- Skin conditions, including obvious lesions or wounds, lice, jaundice, rash, bruises, edema, scars, tattoos, and needle marks
- Characteristics of being at risk for victimization (e.g., age, small build, femininity, first-time offender, and passive or timid appearance)

Clinical screening into current illnesses, health problems, and conditions:

- Illnesses and special health needs, including allergies
- Current medications
- History of hospitalization
- Dental conditions or complaints
- History of tuberculosis or other infectious diseases (or symptoms such as persistent cough, shortness of breath, loss of appetite, fatigue, coughing up blood, night sweats, or unexplained weight loss)
- Medical dietary needs
- Drug and alcohol use, including types, methods, date and time of last use, problems associated with ceasing use, and history of treatment for substance use
- Tobacco use
- For women, current or recent pregnancy, birth control use, date of last menstrual cycle, current gynecological problems, and methadone use
- Current pain
- Notation of personal physician and known medical risks

Testing and initial assessments:

- Record of vital signs
- Oral screening
- Initial mental health screening
- STD testing for syphilis, gonorrhea, chlamydia, and HIV as indicated
- Pregnancy testing as indicated

Mental health screening:

- History of or present suicidal and/or self-destructive behavior or thoughts
- Mental health problems, including suicidal ideation and psychosis
- Current psychotropic medications
- History of hospitalization and/or outpatient mental health treatment
- Current mental health status

#### Information sharing and education:

- Explain right to healthcare
- How to access medical, dental, and mental health services verbally and in writing in a language the individual understands
- Oral health and hygiene education
- PREA screening and education regarding sexual assault
- Explain grievance process
- Document informed consent

#### Verification and referrals:

- Examine medications brought into the facility
- Verify current medications; a clinician may be notified to assess the need for non-formulary medications, which may be provided for up to 30 days until an expedited physical exam can be completed
- Verify medically necessary special diets
- Ask about current health insurance
- Refer for mental health evaluation as indicated
- Refer for emergency, specialty, or dental care as indicated
- Refer for placement/housing (e.g., general population, medical observation, mental health observation, suicide watch, etc.)
- Refer disabled individuals to the physician to determine treatment

Wellpath notifies correctional staff/probation staff of patients needing special oversight, treatment, or management and those with critical conditions, including but not limited to:

- Need of emergency room referral
- Urgent need for medication
- Suicidal thoughts or behavior
- Potential for withdrawal
- Diabetes
- Heart condition
- Seizures
- New or recent injuries
- Mental conditions or personality disorders (potential for violence)
- Contagious illness or disease considered an immediate threat to the patient population or correctional staff/probation staff
- Any other urgent or emergent concerns

#### Admission Deferrals

Admission to the Humboldt County Facilities requires clearance for serious, urgent, or emergent injuries or medical problems. Intake staff may identify arrestees/youth whose clinical status requires urgent or emergent health services not available on site. In this case, Wellpath's medical staff refers the arrestee/youth to a local emergency room or approved hospital. The arrestee's/youth's subsequent admission requires written medical clearance from the hospital.

Reasons for admission deferrals include:

- Trauma/injury upon arrest
- Excessive bleeding
- Chest pain
- Unconscious, semiconscious, or severe confusion
- Active convulsions
- Respiratory distress
- Active labor

## Medication Verification

Wellpath staff ask arrestees/youth about recent medical, dental, or mental health treatment before arrest. They also obtain information regarding the arrestee's/youth's medical provider(s) in the community. We contact the providers to ask about current treatment and verify prescribed medications to facilitate continuity of care.

We ask individuals who report medication use at intake to complete a Release of Information (ROI) form, allowing the medication verification process to begin. A prescribing clinician (physician or mid-level provider) reviews verified medications and continues them as clinically indicated. We expedite medications for life-threatening or serious chronic diseases from a local backup pharmacy, **Red Cross - Eureka**.

Wellpath bridges non-formulary medications for up to 30 days to prevent a break in the continuity of care. Given the nature of jails as short-stay facilities, we typically continue verified medications (formulary or not) throughout a patient's stay, unless the patient reports side effects, poor response to the regimen, or a different medication is deemed more clinically appropriate.

To continue a non-formulary medication beyond the initial bridge order, the prescribing clinician will request continuation of the medication using the **Wellpath Non-Formulary Medication Request** process described in **Section 5.15**.

## 5.2 Health Inventory and Communicable Disease Screening

### Comprehensive Health Assessment – Adult Patients

Wellpath staff conduct a comprehensive health assessment, including a complete medical history and physical examination, for patients within their first 14 calendar days in custody at the Jail. We typically target day 10 for health assessments to ensure compliance with NCHC standards. This also allows us to identify medical needs or conditions not disclosed by the patient during intake and initiate timely treatment. Wellpath staff document patients who refuse physicals and their reasons for refusal.

**Medication Verification / Medical Release Form**  
Authorization for Release of Medical Information

Form Number: IN102UN000ACCB1030114 Page 1 of 1

A properly trained nurse conducts the health assessment following local regulations. Before performing health assessments, nurses complete physical exam training provided or approved by the responsible physician.

A CFMG physician reviews, signs, and dates assessments completed by a nurse. The Wellpath Medical Director reviews abnormal health assessment results for disposition.

The comprehensive health assessment minimally includes the following:

- Review receiving/intake screening
- Record vital signs, height, and weight
- Review immunization history; initiate needed immunizations and therapy
- PPD test for tuberculosis (if not previously administered)
- Laboratory and/or diagnostic tests as required
- Vision and hearing screenings
- Physical examination (including breast, rectal, and testicular exams based on patient gender, age, and risk factors)
- Pap testing for female patients as medically indicated
- Oral screening and hygiene education
- Mental health assessment, including suicide potential and psychiatric screenings
- Review health history; gather additional data needed to complete the medical, dental, and mental health histories
- Document allergies
- Other tests and examinations as appropriate (e.g., diagnostic panel, urinalysis, EKG, etc.)

The healthcare professional conducting the assessment records findings, which also includes the individual's title and signature, as well as the date and time of the assessment. The health assessment becomes a part of the patient's permanent health record.

#### *Follow-up for Identified Health Problems*

Wellpath will continue to identify the need, schedule, coordinate and pay for all supporting diagnostic examinations, both onsite and offsite at the Humboldt County Facilities, including all laboratory services.

Wellpath follows up on health problems identified during the physical examination or in test results. A physician reviews the follow-up for disposition and a care plan. Medical personnel see patients referred for treatment based on the physical examination the following day, unless the referring provider specifies another day, or in the case of life-threatening discoveries.

### Health Care Maintenance

Wellpath provides health maintenance exams for patients incarcerated for prolonged periods to manage existing conditions and identify new conditions or illnesses that may have developed. This managed care approach allows us to keep down costs for medical services while improving the overall health of our patients.

We conduct health maintenance exams for long-term patients within six months of on the date of their incarceration. Health maintenance exams are repeated at reasonable intervals thereafter as determined by the treating physician. Determinations are based on the age, gender, and health of the patient. The specific components of the examination take into consideration the current community standard of care.

The image shows two overlapping 'Periodic Health Assessment' forms. The top form is partially obscured by the bottom one. Both forms include sections for patient information (Name, Date of Birth, Sex, Patient ID, Date), screening questions (Vision, Hearing, Special Circumstances, TB Screening, Pap Smear, Mammogram, Fecal Occult Blood Test), and a physical examination table. The physical examination table has columns for 'Normal' and 'Abnormal' findings for various body systems including Skin, Eyes, Ears, Mouth, Nose, Neck, and others.

### Comprehensive Health Assessment – Detained Youth

In accordance with 15 CCR §1432, Wellpath staff conduct a comprehensive health assessment, including a complete medical history and physical examination, for detained youth within their first 96 hours of admission to the HCJH, excluding holidays. This also allows us to identify medical needs or conditions not disclosed by the patient during intake and initiate timely treatment. Wellpath staff document patients who refuse physicals and their reasons for refusal.

The comprehensive health assessment minimally includes the following:

- Review receiving/intake screening
- Record vital signs, height, and weight
- Review immunization history; initiate needed immunizations and therapy
- PPD test for tuberculosis (if not previously administered)
- Laboratory and/or diagnostic tests as required
- Vision and hearing screenings
- Physical examination (including breast, rectal, and testicular exams based on patient gender, age, and risk factors)
- Pap testing for female patients as medically indicated
- Oral screening and hygiene education
- Mental health assessment, including suicide potential and psychiatric screenings
- Review health history; gather additional data needed to complete the medical, dental, and mental health histories
- Document allergies
- Other tests and examinations as appropriate (e.g., diagnostic panel, urinalysis, EKG, etc.)

## 5.3 Detoxification from Drugs and/or Alcohol

Wellpath provides medically supervised on-site withdrawal management services in accordance with applicable standards of treatment. Patients undergo medical stabilization for withdrawal management to minimize the risk of adverse symptoms and the need for off-site treatment.

Wellpath trains healthcare and correctional staff to recognize the signs and symptoms of withdrawal and safely manage patients experiencing them.

The Wellpath Withdrawal Management Program and Policies for the Facilities incorporate the following:

- **Receiving screening** – Identifying of those at risk
- **Observation and monitoring** – Monitoring and assessment tools to ensure the necessary treatment as quickly as possible
- **Treatment** – Following American Society of Addiction Medicine (ASAM) national practice guidelines

The image shows two overlapping 'QUICK FACTS' and 'SYMPTOMS OF INTOXICATION AND WITHDRAWAL' charts from Wellpath. The top chart is for Benzodiazepines and the bottom chart is for Opioids. Both charts list symptoms of intoxication and withdrawal, and include quick facts for clinical staff.

**Benzodiazepines Chart:**

- QUICK FACTS:** Benzodiazepines are commonly divided into 2 categories: Short acting (less than 12 hours) and long acting (more than 12 hours).
- SYMPTOMS OF INTOXICATION:**
  - Alcohol on breath
  - Bone/joint aches
  - Combative/ness
  - Dilated pupils
  - Impaired memory
  - Inability to pay attention
  - Lethargy
  - Loss of coordination
  - Restricted pupils
  - Slurred speech
  - Unconsciousness
  - Unsteady on their feet
- SYMPTOMS OF WITHDRAWAL:**
  - Anxiety/agitation/irritability
  - Agitation
  - Combative/ness
  - Dilated pupils
  - Disorientation
  - Goosebumps/gooseflesh
  - Increased blood pressure
  - Increased heart rate
  - Nausea/vomiting/diarrhea
  - Paranoia
  - Runny nose/watery eyes
  - Seeing, hearing, and/or feeling things that are not present
  - Seizures
  - Severe headache
  - Shaking
  - Sweating
- QUICK FACTS:**
  - An individual's level of intoxication does not depend on BAC alone, take into consideration other substances, amount consumed, overall health and the length of time they have been using drugs and/or alcohol.
  - Withdrawal from benzodiazepines can be as serious as withdrawal from alcohol, both can lead to death.
  - An elevated temperature is a serious symptom when an individual is experiencing withdrawal from alcohol.
  - Individuals experiencing withdrawal from opiates are at risk for dehydration, which can lead to death.
  - Individuals who use a prescribed benzodiazepine and/or opiate on a regular basis over a period of time may experience the same withdrawal symptoms as someone who buys them off the street.
  - Many individuals today use combinations of multiple substances so monitoring them carefully and treating them for withdrawal is critically important.
  - Treating withdrawal symptoms BEFORE they occur is effective in preventing complications, alert health care staff when an individual reports any type of substance use.
  - Healthcare staff must be notified immediately if a pregnant female reports any type of substance use.
  - Synthetic marijuana products such as Spice and K2 have been suspected of causing cardiac arrest after use.
  - Bath Salts are a man-made substance that has unpredictable results. Persons under the influence of bath salts can experience hallucinations, extreme hyperactivity, elevated blood pressure and heart rate, "superhuman" strength, homicidal and suicidal intentions among other symptoms.

**Opioids Chart:**

- QUICK FACTS:** Opiates tend to have a short half-life, typically anywhere from 30 minutes to 6 hours. When these are in bold below, they are in bold below.
- SYMPTOMS OF INTOXICATION:**
  - Codeine (Tylenol #3), Tylenol #4, cough suppressant
  - Fentanyl patch (Duragesic)
  - Hydrocodone (Lorabid, Norco, Vicodin)
  - Hydromorphone (Dilaudid)
  - Meperidine (Demerol)
- SYMPTOMS OF WITHDRAWAL:**
  - Anxiety/agitation/irritability
  - Agitation
  - Combative/ness
  - Dilated pupils
  - Disorientation
  - Goosebumps/gooseflesh
  - Increased blood pressure
  - Increased heart rate
  - Nausea/vomiting/diarrhea
  - Paranoia
  - Runny nose/watery eyes
  - Seeing, hearing, and/or feeling things that are not present
  - Seizures
  - Severe headache
  - Shaking
  - Sweating
- QUICK FACTS:**
  - An individual's level of intoxication does not depend on BAC alone, take into consideration other substances, amount consumed, overall health and the length of time they have been using drugs and/or alcohol.
  - Withdrawal from benzodiazepines can be as serious as withdrawal from alcohol, both can lead to death.
  - An elevated temperature is a serious symptom when an individual is experiencing withdrawal from alcohol.
  - Individuals experiencing withdrawal from opiates are at risk for dehydration, which can lead to death.
  - Individuals who use a prescribed benzodiazepine and/or opiate on a regular basis over a period of time may experience the same withdrawal symptoms as someone who buys them off the street.
  - Many individuals today use combinations of multiple substances so monitoring them carefully and treating them for withdrawal is critically important.
  - Treating withdrawal symptoms BEFORE they occur is effective in preventing complications, alert health care staff when an individual reports any type of substance use.
  - Healthcare staff must be notified immediately if a pregnant female reports any type of substance use.
  - Synthetic marijuana products such as Spice and K2 have been suspected of causing cardiac arrest after use.
  - Bath Salts are a man-made substance that has unpredictable results. Persons under the influence of bath salts can experience hallucinations, extreme hyperactivity, elevated blood pressure and heart rate, "superhuman" strength, homicidal and suicidal intentions among other symptoms.

### Receiving Screening

Many individuals arrive at intake under the influence of drugs or alcohol requiring some degree of withdrawal. The Wellpath receiving screening probes types of substances used, time of last usage, frequency and amount of usage, length of time using, and side effects experienced during past withdrawals. Our standardized form evaluates all arrestees for signs and symptoms of withdrawal or serious intoxication, including:

- Anxiety and agitation
- Disorientation
- Visual and auditory disturbances
- Nausea and headache
- Tremors
- Paroxysmal sweats
- Elevated pulse, respiratory rate, and blood pressure



Individuals who report alcohol and/or drug dependence or those identified as being at risk for withdrawal receive a more in-depth assessment. Wellpath staff complete this assessment using the Addiction Research Foundation Clinical Institute Withdrawal Assessment for Alcohol – Revised (CIWA-Ar) and/or the Clinical Opioid Withdrawal Scale (COWS).

These evidence-based tools help nursing staff assess the severity of withdrawal symptoms based on the patient’s behavior or responses to questions. Medical providers also use the CIWA-Ar/COWS tools to gauge how patients respond to medications administered to stabilize withdrawal symptoms.

Arrestees who have the potential of withdrawal from alcohol based on frequency, duration of drinking and history, or current experience of symptoms are started on CIWA protocol and receive their first dose of Librium within four hours. If an individual is receiving medication-assisted treatment (MAT) in the community, healthcare staff verify treatment and contact the MAT provider for orders. Arrestees who show signs of opioid withdrawal are started on COWS protocol.

### Observation and Monitoring

When a patient is considered a high risk for withdrawal, the nurse contacts the physician/mid-level provider on duty or on call to determine whether placement in observation is indicated. Healthcare staff monitor patients at risk for withdrawal throughout the medical stabilization process.

Healthcare staff monitor patients experiencing withdrawal from alcohol, opiates, or benzodiazepines for at least five days, or longer if deemed necessary by the provider. They assess patients undergoing withdrawal monitoring three times daily and when requested by facility staff. Assessments include CIWA/COWS checks to determine the level of withdrawal. Scores are calculated at each assessment to determine appropriate patient intervention, as well as the success of treatment provided.

The assessment includes a short mental health screen for thoughts of suicidality, hopelessness, or recent bad news. If a patient gives positive answers to any of these questions, healthcare staff notify mental health staff immediately and place the patient on suicide watch. Wellpath takes this proactive approach since withdrawal is a risk factor for suicide and suicide attempts.

## **Treatment**

Wellpath has developed an order set for clinicians to use when managing and treating withdrawal symptoms. The order set is based on best practices for determining the medication to be used, starting dose, and dosing frequency. It establishes the minimum amount of medication needed to treat patients going through withdrawal, allowing for real-time use for most patients. If a patient does not respond as expected to the medication, the clinician develops an individualized treatment plan.

### **Alcohol and Benzodiazepine Clinical Decision Support Tools**

An individualized treatment plan for individuals at risk for alcohol or benzodiazepine withdrawal is developed based on the physician's assessment of the patient's condition and may include pharmaceutical therapy. The Regional Medical Director orients clinicians on effective management of care based on specific criteria.

### **Opioid Use Disorder Clinical Decision Support Tools**

Patients who are at risk for opioid withdrawal are typically identified during the receiving screening. Opioid withdrawal has significant clinical implications that can lead to an unstable clinical condition for many patients, including those who are pregnant, aged, have multiple co-morbidities, or are otherwise fragile. We place all patients at risk of opioid withdrawal on COWS protocol and monitor them three times daily for a minimum of five days.

Opioid-dependent pregnant patients receiving medication-assisted treatment (MAT) in the community will have their medications continued. Wellpath encourages pregnant patients to continue MAT already in progress, as opioid withdrawal can have an adverse impact on the fetus. Opioid-dependent pregnant patients will never be required to go through withdrawal. All opioid-dependent pregnant patients will be offered either methadone (through a community provider) or buprenorphine and will be monitored and cared for closely, regardless of weeks of gestation.

If a patient is opiate-dependent (and not pregnant), withdrawal management is based on clinical stabilization, which may require the use of symptom management medications such as acetaminophen, ibuprofen, and loperamide hydrochloride (Imodium). Some patients may also benefit from the use of a mu-opioid agonist, such as buprenorphine, for better symptom control.

When allowed by the facility, Wellpath supports the use of a minimum five-day buprenorphine taper (typically within 24-72 hours of admittance depending on drug of use/addiction). When a patient reaches a COWS score of 8 or greater, this indicates mild withdrawal symptoms; healthcare staff will notify a DEA-X waived Wellpath provider, who may order the buprenorphine taper. This low dosage of medication helps control symptoms and prevent withdrawal. Other benefits to buprenorphine include a reduction of poor outcomes, enhancement of patient cooperation, reduction of other sick call complaints, and decrease of suicide rates. The buprenorphine taper can be used to accomplish medical stabilization but can also be used as a bridge to a maintenance dose for facilities offering MAT.

Wellpath has developed and codified an update to our clinical decision support tools for the management of opioid use disorder (OUD), including but not limited to:

- Patient education material
- Monographs
- Algorithms
- Screening/interview tools
- Consents
- Agreements
- Practitioner orders
- Chronic care exam forms
- Post medical stabilization daily checks
- Nursing training tools

## 5.4 Sick Call and Triage

A responsible triage and sick call program is one of several critical operating systems for adequately and expeditiously caring for patients with onset of acute or semi-chronic symptoms, other than those requiring emergency care. The Wellpath sick call process ensures patients have access to medically necessary healthcare services. A combination of nurses and physicians provide sick call services as defined within their scope of practice. We allocate healthcare staff for the sick call process to see patients timely according to NCHC and CCR Title 15 standards.

Intake staff advise arrestees and youth of their right to access care and the process for requesting healthcare services. We communicate this information verbally and in writing in a language the arrestee understands. We ensure that arrestees and youth who do not speak English understand how to obtain healthcare.

Patients at the Humboldt County Facilities have access to sick call request forms that meet all standards and guidelines. Correctional staff/probation staff can also refer patients if they have concerns for their health status. We record all medical complaints, along with a recommended intervention and referral as appropriate.

Patients have access to routine and emergency care regardless of their location, custody level, or status. If a patient is unable to attend a sick call session due to custody status (e.g., restricted housing) or as a result of physical condition, we conduct sick call services at the patient's cell.

Healthcare services comply with State of California and federal privacy mandates. We understand the importance of decentralized services for minimizing inmate and youth movement, so we will continue to conduct sick call services and nursing encounters in housing units when possible.

Wellpath tracks all Sick Call Requests and scheduling utilizing the CorEMR Electronic Medical Record system. Sick Call Requests completed by patients are routed to the Medical Unit staff responsible for scheduling. Following scheduling, the Sick Call Request and all corresponding treatment notes are incorporated into the patient's electronic health record.

The image shows a 'HEALTHCARE REQUEST' form from Wellpath. The form is titled 'HEALTHCARE REQUEST SOLICITUD DE SERVICIO DE SALUD'. It includes a 'RECEIVED' stamp with fields for Date, Initials, and Time. The form contains several sections:
 

- Personal Information:** Name (Nombre), DOB (Fecha de nacimiento), ID # (Nº de identificación), and Living Unit (Unidad).
- Service Selection:** Checkboxes for Medical (Medico), Behavioral Health (Salud Mental), Dental (Dental), and Other.
- Problem Description:** 'Nature of problem or Request (be specific) / Naturaleza del problema o solicitud (sea específico)'. There are two lines for text entry.
- Consent:** A section with English and Spanish text: 'I consent to be treated by Health Care Staff for the condition described...' and 'Do I agree to be treated...?'. It includes a note about confidentiality.
- Signature and Date:** Fields for Patient Signature (Firma del Paciente) and Date (Fecha).
- Triage Section (TO BE COMPLETED BY TRIAGING STAFF):** Includes checkboxes for Emergent, Urgent, and Routine; Triage Date; Initials; and Time.
- Initials Section:** Checkboxes for Sick Call, Nurse, HCP, Dentist, Behavioral Health, Eye Doctor, and Other.
- Response Section (TO BE COMPLETED BY HEALTHCARE STAFF):** Checkboxes for 'Patient seen (if applicable)', 'Response sent to patient (if applicable)', and 'Patient released from custody'. It also has checkboxes for 'Patient outside of facility (hospital, court, etc.)', 'Patient refused, Refusal Form complete', and 'Fee Charge' (No/Yes, Amount \$).
- Comments and Signatures:** A 'RESPONSE TO PATIENT / COMMENTS' section with a line for text, a 'NOTE' at the bottom, and fields for Staff Signature and Date.

## Sick Call

Qualified nurses conduct sick call triage seven days a week, including holidays at the HCCF and the HCJH. Following the collection of healthcare request forms each day, a nurse reviews and prioritizes sick call requests. Patients receive a face-to-face consultation at the next scheduled nurse sick call, which also takes place seven days a week per NCCHC standards.

The sick call nurse assigns each sick call request a disposition of emergent, urgent, or routine. We will continue to address the patient's request within the appropriate time frame. Requests triaged as emergent receive immediate attention. Urgent requests are scheduled for the next provider sick call clinic. Should the need arise outside the scheduled sick call, patients requiring urgent or emergent medical attention will be seen the same day.

During triage, the nurse initiates referrals for patients needing consultation with the medical provider. If the patient needs to see more than one provider, we make multiple referrals. The nurse documents the referral on the request form.

## Professional Nursing Protocols (PNPs)

Wellpath nurses conduct sick call using Professional Nursing Protocols (PNPs). Our physicians developed PNPs to assist nurses with treatment recommendations and promote consistent caregiving. PNPs provide a **consistent structure for patient care, justification for actions, and a set of interventions specific to the patient's presenting condition**. Their purpose is to give nurses information regarding specific health conditions or complaints so they can reach logical conclusions from their observations, then provide appropriate intervention and follow-up.

In its simplest form, a Professional Nursing Protocol is a decision-tree process for nurses to follow, which also improves ease of training and **optimizes practitioners' time**. All Wellpath nurses are trained to use the PNPs, which cover topics such as:

- Abdominal pain
- Allergic reaction (emergent)
- Altered mental status
- Behavioral health complaint
- Chest pain
- Cold/allergy symptoms
- Conditions not requiring medical treatment
- Dental complaints/pain
- Ear complaints
- Eye complaints
- Female-specific complaints
- Fever
- Gastrointestinal complaints
- Headache
- Heat-related illness
- Hyperglycemia
- Hypertension
- Hypoglycemia
- Male-specific complaints
- Musculoskeletal complaints
- Neurological impairment
- Nosebleeds
- Pregnancy, 20 weeks or more
- Pregnancy less than 20 weeks
- Respiratory complaints
- Self-injurious behavior
- Skin problems
- Trauma
- Urinary complaints
- Use of force
- Withdrawal, alcohol and benzodiazepine
- Withdrawal, opiate
- Wounds

The PNP manual is subject to approval by the designee. The site Medical Director reviews the manual annually and the Wellpath Nursing Department makes the necessary updates. The HSA and/or DON instructs the nursing staff on revisions, as applicable.

Nurses access electronic versions of the PNPs through CorEMR and document findings directly in the patient's medical record. The electronic PNPs include a health education component. The nurse is prompted to educate the patient on symptoms to look for and when to notify medical staff about their symptoms. For example, a nurse seeing a patient for a headache might tell the patient to notify staff if the pain persists for more than four hours, if the patient experiences auras or visual changes, or if the patient has changes in balance/equilibrium. The education is provided verbally, or the nurse prints a handout for the patient to keep. The electronic PNP has a checkbox for the nurse to note education has been provided; this documentation is also a compliance measure for NCCHC.

### Nursing Support Tools

Wellpath is dedicated to supporting our nursing teammates by enabling them to deliver excellent patient care and support improved patient outcomes. We invest in resources that are evidence-based, immediately accessible to each staff member, and supports clinical decision-making.

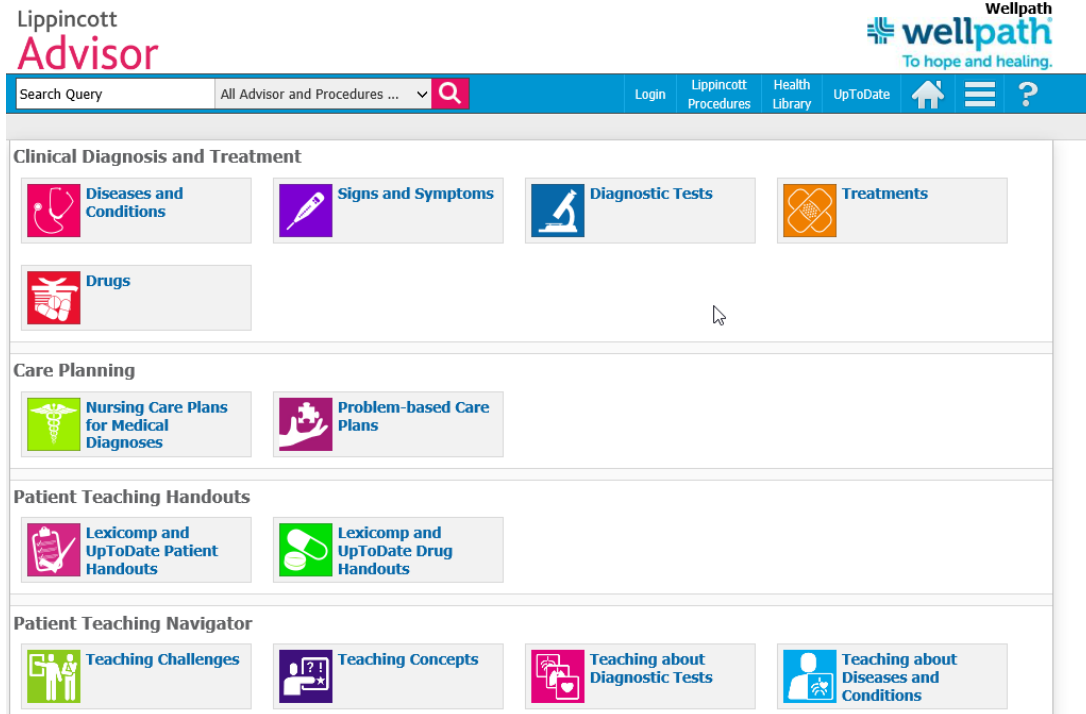
Wellpath partners with Wolters Kluwer to provide our staff evidence-based resources including Lippincott Procedures and Lippincott Advisor. Lippincott Procedures is an online source for instant, evidence-based procedure guidance at the point of care. With over 1,800 procedures and skills from novice to expert and covering a wide variety of nursing specialties, it combines the most trusted clinical content with powerful online workflow functionality that saves time, standardizes care, and delivers improved patient outcomes. We encourage ancillary and support staff to access Lippincott Procedures to support their scope of practice.



*Nurses can make informed clinical decisions and perform quality skills. All procedures include step-by-step guides, simplified quick lists, information about special considerations, complications, documentation, as well as visual references, like full-color images and video clips.*



*Staff can quickly and easily consult "Nurse Lippincott" for clinical decision support regarding Signs & Symptoms, Diagnostic Tests, Diseases & Conditions, Hospital-Acquired Conditions, Treatments, Care Plans, and more. Nursing use the Health Library to access more than 30 evidence-based eBooks on a variety of medical/health topics.*



## Provider Clinics

Our mid-level provider, Nicholas Entsminger, or site Medical Director, Dr. Ziegler, sees referred patients during the next scheduled provider clinic at each Facility. Clinics are scheduled as needed to meet the health needs of the patient population. A physician or mid-level provider is also on-call 24/7 for emergencies.

The medical provider assesses the patient and provides the appropriate treatment and follow-up. Wellpath practitioners use evidence-based practices to make clinical decisions regarding patient treatment. We have developed clinical monographs that represent best practices our practitioners should use when treating both episodic and chronic medical needs. Wellpath practitioners also receive training from the Wellpath clinical department on clinical decision-making in the correctional environment.

Our EHR system, CorEMR, allows providers to begin sick call directly from the schedule view. CorEMR uses the standard SOAPe (subjective, objective, assessment, plan, education) format to guide the examiner. Scanned documents and electronic files can be stored directly into SOAPe notes. During sick call, CorEMR displays summary information, such as the patient's current medical problems and medication compliance.

## 5.5 Off-Site Services for All Facilities

Wellpath will continue to ensure appropriate and timely access to specialty care at the Humboldt County Facilities and will schedule referrals for specialty care providers according to clinical priority. We provide specialty services with urgent priorities as quickly as possible within seven days of referral, and routine specialty services as soon as possible within 30 days of referral. If services do not occur within

these timeframes, the medical practitioner re-evaluates the patient to determine and document the level of need.

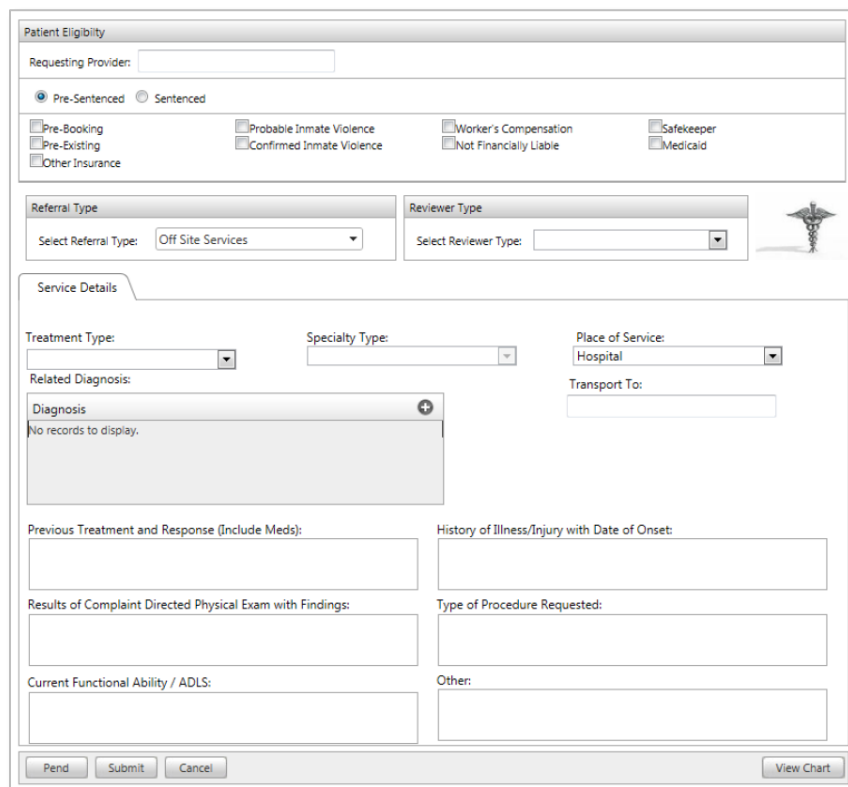
Wellpath staff at the Humboldt County Facilities schedule appointments for specialty services through our powerful **Care Management system**, which allows staff to prioritize and track specialty appointments to ensure they take place within the required timeframe. If a patient needs specialty services that are not available on-site, we authorize, schedule, and coordinate the provision of services with local providers.

### 5.5.1 Off-site

Wellpath arranges with local providers and hospitals to treat patients with healthcare needs beyond the scope of care provided at the Humboldt County Facilities. We authorize, schedule, and coordinate off-site services, such as outpatient surgery, diagnostic testing (e.g., MRI, CT scan, etc.), and ER ambulance services.

Wellpath staff initiate referrals for off-site treatment through our Care Management system (described in [Section 5.5.2](#)). Referrals are limited to the chief complaint(s) indicated through a referral form and/or medical consultation. Approvals are based on appropriateness and necessity. The following screenshots show the form used to refer patients for off-site treatment and a view of submitted requests.

#### Off-site Service Referral Form – Care Management System



The screenshot displays a web-based form titled "Off-site Service Referral Form – Care Management System". The form is organized into several sections:

- Patient Eligibility:** Includes a "Requesting Provider" text field, radio buttons for "Pre-Sentenced" (selected) and "Sentenced", and a grid of checkboxes for "Pre-Booking", "Pre-Existing", "Other Insurance", "Probable Inmate Violence", "Confirmed Inmate Violence", "Worker's Compensation", "Not Financially Liable", "Safekeeper", and "Medicaid".
- Referral Type:** A dropdown menu with "Off Site Services" selected.
- Reviewer Type:** A dropdown menu.
- Service Details:** Contains dropdowns for "Treatment Type", "Specialty Type", and "Place of Service" (set to "Hospital"), and a "Transport To" text field. Below these is a "Related Diagnosis" section with a "Diagnosis" list box showing "No records to display." and a "+" icon for adding records.
- Text Fields:** Several large text areas for "Previous Treatment and Response (Include Meds)", "History of Illness/Injury with Date of Onset", "Results of Complaint Directed Physical Exam with Findings", "Type of Procedure Requested", "Current Functional Ability / ADLS", and "Other".
- Buttons:** "Pend", "Submit", "Cancel", and "View Chart" are located at the bottom of the form.





Provider Name Search  Search [PRF \(Provider Request Form\) in WOW](#)

Tier	Name	Phone	Address	City	State	Specialty	Zip	Fax	Mileage
1 - Preferred	Rocky Mountain Radiologists	303-425-2015	1873 South Bellaire St Ste 420	Denver	Colorado	Cardiology	80222		11
1 - Preferred	Rocky Mountain Radiologists	303-425-2090	1873 S Bellaire St Ste 420	Denver	Colorado	Cardiology	80222		11
1 - Preferred	Cu Medicine	720-848-0000	12605 E 15th Ave	Aurora	Colorado	Cardiology	80045		16
1 - Preferred	Cu Medicine	720-848-0000	13199 E Montview Ave	Aurora	Colorado	Cardiology	80045		16
1 - Preferred	University Physicians Inc	720-848-0000	1635 Aurora Ct	Aurora	Colorado	Cardiology	80045		16
1 - Preferred	University Physicians Inc	720-848-0000	12605 E 15th Ave	Aurora	Colorado	Cardiology	80045		16
1 - Preferred	University Physicians Inc	720-494-3132	13123 E 15th Ave	Aurora	Colorado	Cardiology	80045	720-494-310	16

### Appointment Scheduling

Once the referral is approved, Wellpath staff schedule an appointment through the Care Management system. The Care Management system is a valuable tool for healthcare staff when prioritizing specialty appointments. This powerful scheduling function makes our Care Management system an integral tool in the provision of care. Features include:

- Recurring appointments (ideal for chronic care patients)
- Cancellation of appointments for patients who have been released

- Rescheduling of pending appointments for patients who are re-admitted to the facility
- Easy-to-view daily/weekly/monthly calendars for staff review
- Shows missed appointments (due to security, court appearances, etc.) and allow for rescheduling

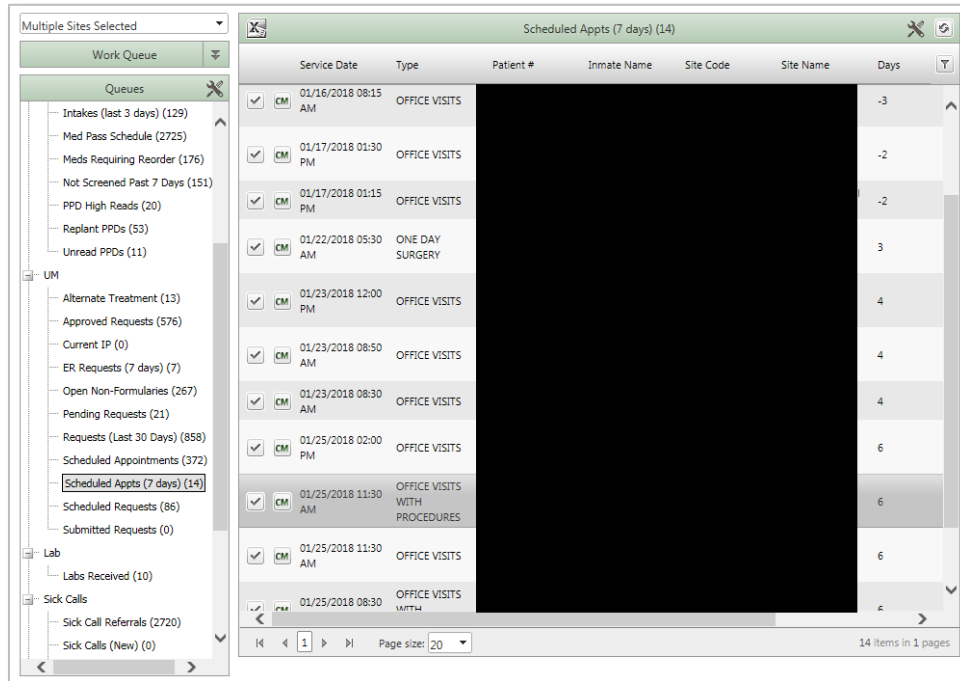
The following screenshots show various views of the appointment process in the Care Management system.

### Appointment Scheduling – Care Management System

### Sample Scheduled Appointments List (On-Site)

View	Date	Site Department	First Name	Last Name	Patient #	Booking #	Location	Service	Status
[Icon]								Chronic C	Scheduled
[Icon]								Outpatient	Scheduled
[Icon]								Outpatient	Rescheduled
[Icon]								Mental H	Rescheduled
[Icon]								Outpatient	Scheduled
[Icon]								Outpatient	Scheduled
[Icon]								Medical	Scheduled
[Icon]								Chronic C	Scheduled
[Icon]								Medical	Scheduled
[Icon]								Sick Call	Scheduled
[Icon]								Medical	Scheduled
[Icon]								On Site S Clinic	Scheduled
[Icon]								On Site S Clinic	Scheduled
[Icon]								On Site S	Scheduled

## Sample Scheduled Appointments List (Off-Site)



Service Date	Type	Patient #	Inmate Name	Site Code	Site Name	Days
01/16/2018 08:15 AM	OFFICE VISITS					-3
01/17/2018 01:30 PM	OFFICE VISITS					-2
01/17/2018 01:15 PM	OFFICE VISITS					-2
01/22/2018 05:30 AM	ONE DAY SURGERY					3
01/23/2018 12:00 PM	OFFICE VISITS					4
01/23/2018 08:50 AM	OFFICE VISITS					4
01/23/2018 08:30 AM	OFFICE VISITS					4
01/25/2018 02:00 PM	OFFICE VISITS					6
01/25/2018 11:30 AM	OFFICE VISITS WITH PROCEDURES					6
01/25/2018 11:30 AM	OFFICE VISITS					6
01/25/2018 08:30 AM	OFFICE VISITS WITH					6

### Transportation and Security

Wellpath coordinates transportation and security with Humboldt County Facilities correctional staff for all off-site services. We work cooperatively with correctional staff to ensure safe and timely transportation. Patients are not informed of scheduled appointment dates, times, or the location of outside providers.

We provide correctional staff with advanced written notice of scheduled appointments. We attempt to consolidate the scheduling of off-site appointments with **St. Joseph Hospital - Eureka** and other healthcare providers to minimize the impact on transportation personnel and available vehicles.

### Transfer of Medical Information

Pertinent medical information accompanies patients traveling to an off-site specialty appointment, hospital, another detention/correctional facility. Upon transfer to another facility, the patient travels with a medical transfer form containing all necessary information required for the continuation of treatment.

### Documentation and Follow-up

Wellpath maintains an active log of off-site care. When patients return from an off-site appointment or hospital stay, a medical provider sees them during the next provider sick call clinic and documents the follow-up in the patient's medical record.

All information and documentation returned with the patient from an outside provider become part of the patient's medical record. This typically includes a disposition and instruction sheet that describes actions taken, orders written, findings from consults, treatments performed, and a detailed discharge summary for those returning from inpatient hospitalization.

## 5.5.2 Wellpath Care Management System

Wellpath implemented our web-based Care Management system at the Humboldt County Facilities in 2019, **at no cost to the County**. Our Care Management system enhances clinical control and cost efficiencies for off-site care by allowing us to track off-site services, ensure timely return from off-site visits, manage claims, and provide reports that assist the County with cost containment and budget preparation.



The Care Management system functions alongside the Facilities' Jail Management System, OMS, to ensure accurate reporting. Facility administration can access to the Care Management system to view management information and monitor off-site scheduling and inpatient status. With our robust Care Management system, Wellpath offers a level of automation and accuracy in reporting that no competitor can match.

### Advanced Utilization Management

Wellpath has the **strongest utilization management program** in the industry for managing patient care. Our Care Management program uses evidence-based guidelines to determine medical necessity as part of our approval process.



Wellpath coordinates, validates, and tracks off-site care and invoicing through the Care Management system. Our established review process ensures that off-site referrals are medically necessary and payments are appropriate. Following is a summary of the Wellpath Care Management process.

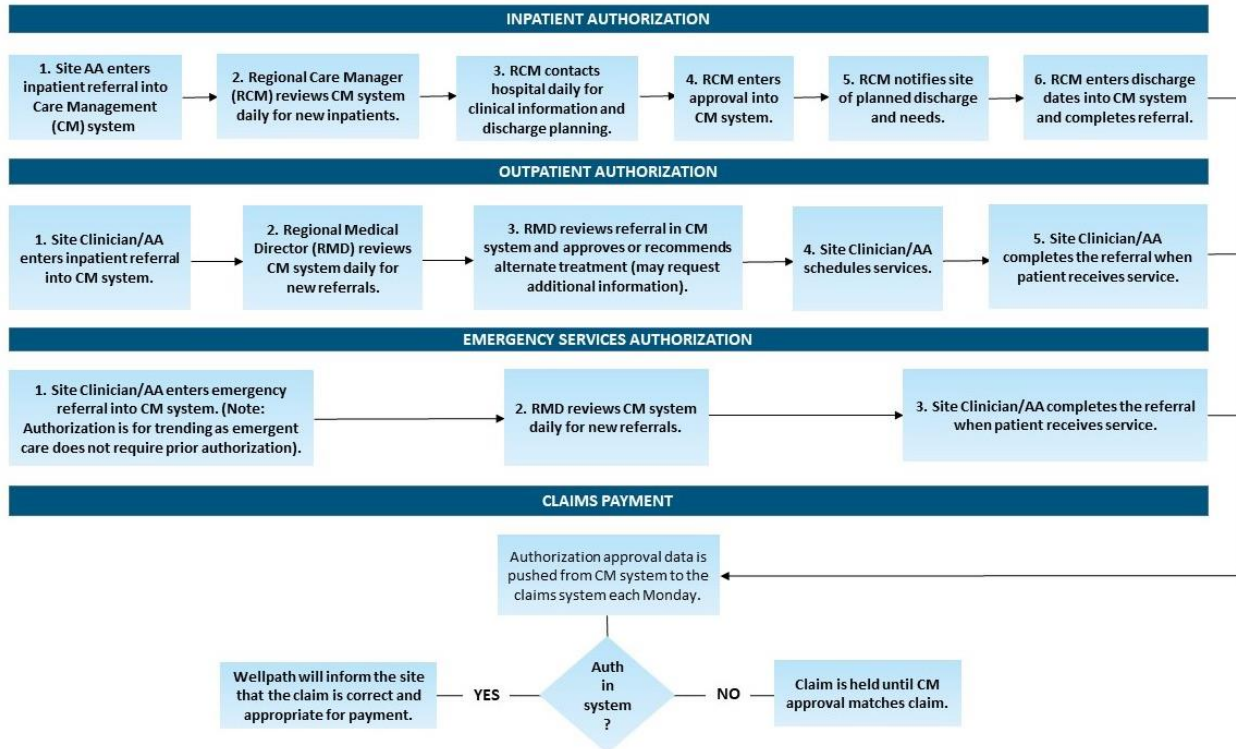
1. When an on-site provider determines that a patient may need community-based services, the provider uses the Care Management system to document and communicate the Consultation Request.
2. Our Chief Clinical Officer and/or Regional Medical Director accesses the Care Management system daily to review requests and takes one of the following actions:
  - Authorizes a specific diagnostic or therapeutic modality
  - Recommends an alternative treatment plan
  - Requests additional information
3. If the requested service is medically necessary, it is approved. An authorization number is established in the Care Management system, which automatically sends the authorization number to the Facility and the **Wellpath Claims Department**.
4. Once the Facility receives an authorization number, we schedule an appointment within the system. Authorization numbers are only valid for a specific period. Wellpath communicates service approval to the community provider and requires pre-approval to assume financial responsibility for services rendered. We also verify that all invoiced charges are appropriate. Since the system sends the authorization number to our Claims Department, they can review every invoice to ensure you are billed only for the approved services.

Wellpath provides clients with complete access to our easy-to-use Care Management system, including real-time utilization reporting. We are fully transparent in our Care Management process, assuring our clients that **only necessary off-site trips are made**.

5. If a patient is released from custody before a scheduled appointment, Wellpath notifies the community provider that the County is no longer financially responsible and removes the pending appointment from the system.
6. The site Medical Director, Dr. Ziegler, reviews and addresses discharge summaries and medical recommendations that the community provider makes.

The following chart illustrates the Wellpath Review Process.

### The Wellpath Review Process




### Utilization Review

The Wellpath Care Management system generates reports that allow us to analyze the utilization of off-site services on behalf of Humboldt County. We use this data to assess the need for additional on-site and off-site services, as well as the potential impact that systems such as telemedicine may have. We continuously evaluate the number of cases and the costs associated with transporting patients to determine which clinics are held on-site. Constant evaluation of specialty services ensures the most cost-effective solution for clinics.

Following is an example of Wellpath’s Event Detail Report.

**Sample Event Detail Report**

 <b>Event Detail Report</b> Service Date Range: 10/01/2019 00:00AM - 12/31/2019 11:59PM											
Page 1 of 2											
489 Day(s)			INPATIENT HOSPITALIZATION Totals								
489 Day(s)			INPATIENT HOSPITALIZATION Totals								
OBSERVATION 4 EVENT(S)											
Jails											
10/03/2019	10/04/2019		6001						Y	Y	Medicaid
11/30/2019	12/02/2019		6001								
11/30/2019	12/02/2019		6001								
12/05/2019	12/06/2019		6001								
4			OBSERVATION Totals								
4			OBSERVATION Totals								
OFFICE VISITS 32 EVENT(S)											
Jails											
10/08/2019			6001								
10/09/2019		CARDIOLOGY AND MAXILLOFACIAL SURGERY	6001								
10/10/2019		ORAL AND MAXILLOFACIAL SURGERY	6001								
10/21/2019		OPHTHALMOLOGY	6001								
11/15/2019		UROLOGY	6001							Y	Not Financially Liable
11/18/2019		ORAL AND MAXILLOFACIAL SURGERY	6001						Y		Pre-Existing
11/20/2019		OBSTETRICS	6001							Y	Not Financially Liable

**5.5.3 Hospital Care**

Wellpath authorizes, schedules, and coordinates inpatient services when a patient requires hospitalization. We work with **St. Joseph Hospital - Eureka** when an acute care setting is required, communicating frequently with hospital administrations. Healthcare staff make referrals for inpatient care through our Care Management system. The site Medical Director, Dr. Ziegler, authorizes hospitalizations.



### Emergency Room and Inpatient Referral Form – Care Management System

The screenshot shows a web-based form for creating a referral. It is divided into several sections:

- Referrals:** A sidebar menu with options like 'New Referral', 'Off Site Services', 'ER/Direct Admit', and 'Transport Only'.
- Patient Eligibility:** Includes a 'Requesting Provider' field, radio buttons for 'Pre-Sentenced' (selected) and 'Sentenced', and checkboxes for various insurance and status categories like 'Pre-Booking', 'Probable Inmate Violence', 'Worker's Compensation', 'Safekeeper', 'Pre-Existing', 'Confirmed Inmate Violence', 'Not Financially Liable', 'Medicaid', 'Tribal Pays', and 'Other Insurance'.
- Bed Type:** Radio buttons for 'Inpatient Stay' and 'Observation'.
- Referral Type:** A dropdown menu set to 'ER/Direct Admit'.
- Service Details:** A section with a red box around its title.
- Treatment Type:** Radio buttons for 'EMERGENCY ROOM' (selected) and 'DIRECT ADMIT'.
- Means of Transportation:** Radio buttons for 'Custody Car' (selected), 'Ambulance', and 'Air Ambulance'.
- Hospital Name:** A text input field with a red box around it.
- ER Admit Date:** A date and time selector with a red box around the date field, set to 12:00 AM.
- Discharge Date:** A date and time selector set to 12:00 AM.
- Presenting Problem:** A 'Diagnosis' dropdown menu showing 'No records to display'.
- Reason for Visit:** A large text area for notes.
- Buttons:** 'Pend', 'Submit', 'Cancel', and 'View Chart' at the bottom.

Wellpath will continue to communicate frequently with Humboldt County to provide the most complete evaluation and treatment of the patient population. When inmates or youth are hospitalized, we will provide the Facility administrator or their designee with a daily inpatient census report, which can also be accessed directly through the Care Management system.

### Inpatient Census Report – Care Management System

**wellpath**

**Inpatient Census Report**

Patient Types: N-None, S-State, FED-Federal, CMP-Interstate Compact, ICE-ICE/INS, SMCP, USMS

**Report Description:** This report displays all Inpatients between the Start Date and End Date and reflects the inpatient days for the date range chosen.

Site Name	Site Department	Patient Name	Patient Type	Patient Number	Booking Number	DOB	Auth Code	Req Create Date	Custody Date	Days From Custody	Admit Date	Dischg Date	Hospital Name	Diagnosis	Total IP Days	IP Days Range
							12044103	3/2/2020	2/26/2020	3	2/28/2020	3/5/2020		E-13.91.001 diabetes mellitus with ketoadicidosis without coma; True; N17.9 Acute kidney failure unspecified; True; F10.231 Alcoholic dependence with withdrawal delirium; True; F-15.121 Other stimulant abuse with intoxication delirium; True	5	4
							12171312	3/18/2020	3/6/2020	11	3/17/2020	3/18/2020		K40.91 Unilateral inguinal hernia w/o obstr or gangrene recurrent; True	1	1
							12171277	3/18/2020	3/15/2020	2	3/17/2020	3/23/2020		J50 Pleural effusion not elsewhere classified; True	6	6
							12171283	3/18/2020	8/5/2019	225	3/17/2020	4/1/2020		T81 Acute infection following a procedure subsequent encounter; True; S82.015A Non displaced osteochondral fracture of left patella; not; True	15	15

### Prospective Review (Prior Authorization)

Wellpath requires prior review and authorization of non-urgent or non-emergent care. Our clinicians follow NCCHC standards and correctional guidelines to review and approve services. The site Medical Director initiates a second review if standards are not clearly met. Alternative treatment is at the discretion and direction of a physician.

### Emergency Services

Wellpath does not require prior authorization for emergent services. Medical personnel may make emergency off-site referrals based on established guidelines and their professional interpretation of a patient's need. Off-site medical services exceeding the scope of the initial emergent episode are not covered. Unrelated, non-emergent diagnostic services or treatment initiated in conjunction with an emergent event require prior authorization.

### Length of Stay Management

Wellpath Regional Care Manager will continue to oversee off-site inpatient care through daily contact with the hospital. Our Care Management Team is notified at the time of inpatient admissions. The Regional Care Manager and Regional Medical Director, Dr. Shah, follow NCCHC standards, *InterQual Criteria*, and correctional guidelines to review inpatient services daily.

### Concurrent Review

Wellpath's Medical Director of Care Management conducts telephonic clinical rounds twice weekly to ensure inpatient stays are appropriate and meet national guidelines, such as *InterQual Criteria*, for continued inpatient stay. *InterQual Criteria* are evidence-based clinical decision support guidelines used to determine the appropriate care setting based on severity of illness and level of care required.

The Wellpath site Medical Director, Regional Medical Director, and Regional Care Manager attend clinical rounds discussions. This multidisciplinary approach ensures inpatient stays are well-managed, and appropriate transitions of care are completed with improved accuracy.

### Retrospective Review

The Wellpath Care Management Department and Wellpath Humboldt County Facilities leaders retrospectively review emergency care to resolve claims issues, determine appropriateness of care post-delivery, and perform focused reviews. The Care Management Department can also perform focused reviews at the request of the provider.

### Discharge Planning

Wellpath manages a robust hospital discharge planning process that begins at inpatient admission. Our Regional Care Manager will continue to work collaboratively with our on-site staff and hospital staff to ensure appropriate transitions of care. This partnership helps us ensure that excellent care continues from hospital discharge through return to the facility.

### Documentation and Follow-up

Medical staff see patients returning from a hospital stay for follow-up during the next provider sick call clinic and document the follow-up in the patient's medical record. Detailed information and documentation returned with the patient, such as discharge summary, disposition and instruction sheet describing actions taken, orders written, and treatments performed, become part of the medical record.



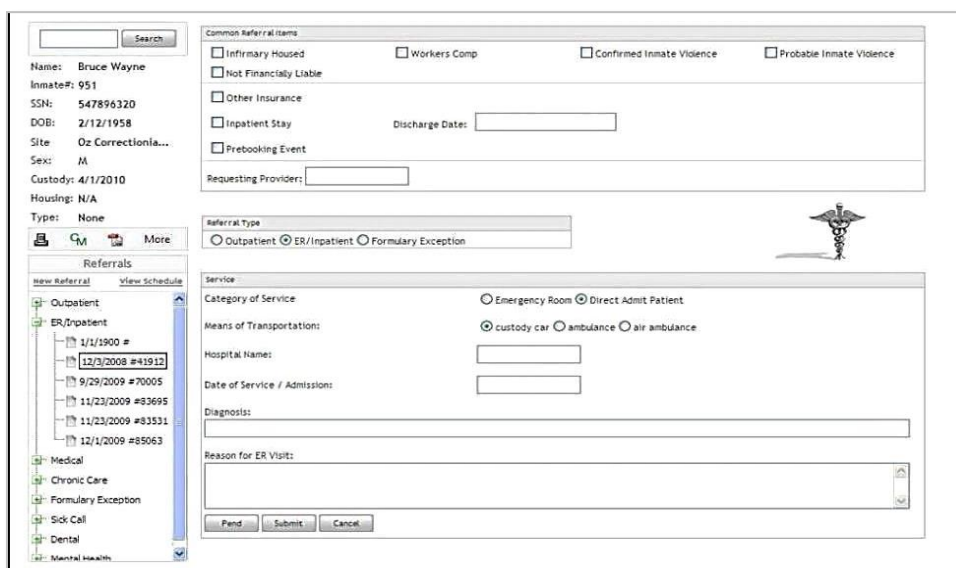
## 5.5.4 Emergency Services

Wellpath provides emergency medical services 24 hours a day for individuals in custody of the Humboldt County Facilities. Correctional healthcare personnel at the HCCF and HCJH are trained to respond to emergencies within four minutes. A Wellpath staff member will report to the area of the emergency with necessary equipment and supplies. By training our nurses in emergency response and offering on-call physician services, we can often reduce off-site/ER trips and hospital stays.

Healthcare staff determine if a patient needs to be transported to the **St. Joseph’s Hospital - Eureka** emergency room for treatment. They stabilize the patient on-site, then transfer the patient to an appropriate medical facility if necessary. We will continue to coordinate with local hospitals in emergencies and communicate with correctional staff for emergency transport and ambulance services.

On-site healthcare staff may make emergency off-site referrals based on established guidelines and their professional interpretation of a patient’s need. The on-call physician will be notified as soon as possible. The site Medical Director conducts a retrospective review following an ER referral to ensure that the action was appropriate and to identify any additional staff training needed.

### Retrospective Review Form for Emergency Services – Care Management System



Wellpath has customized monthly reports of emergency room visits for the County. Data includes the patient’s name and identification number, the date of emergency service, the patient’s disposition, and the emergency treatment received.

### On Call Coverage

Wellpath’s site Medical Director and/or Mid-level Provide, and HSA are on call 24/7 to respond to medical and custody staff for routine or emergency situations. Our Regional Director of Operations and Regional Medical Director are also available by telephone in emergency situations.

### Wellpath Now

Our **Wellpath Now** system (described in [Section 5.25](#)) ensures that a Physician or mid-level practitioner is available by video conference 24/7/365 for off-hours emergencies.

### Emergency Transportation

Wellpath staff coordinate emergency transport and ambulance services with correctional staff. Healthcare staff work cooperatively with correctional staff to ensure that transportation services are provided in a safe and timely manner.



### Emergency Treatment for Visitors and Staff

Wellpath provides emergency medical treatment and first aid to stabilize staff, visitors, employees, or subcontractors who become ill or injured and require emergency care while on the premises. Once the individual's condition is stabilized, we direct the patient to a personal physician or local hospital as appropriate. Wellpath staff document services provided.

## 5.5.5 Third Party Billing

When off-site care is required, Wellpath ensures that Humboldt County is billed appropriately. When a Wellpath team member initiates an off-site referral and schedules an appointment in our Care Management system, the system determines who is financially responsible for the requested off-site treatment—Wellpath, the County, Medicaid, or another payer. When Wellpath or the County is liable:




- Wellpath queries our private insurance eligibility partner, with a network of nearly 1,000 payers.
- The Care Management system updates the patient record with start and end dates of coverage.
- Insurance information is transmitted to a third-party administrator.
- Wellpath sets the claim for coordination of benefits.

***Since January 2020, we have saved our clients unnecessary off-site expenses by completing more than 1,000 authorizations for third party coverage.***



### Claims Management

 Through our subsidiary third-party administrator (TPA), Health Cost Solutions (HCS), Wellpath has more than 30 years of experience saving money for clients by preventing claims payment on non-compliant billing practices. As an industry leader and full-service TPA, HCS handles all aspects of claims adjudication, including patient eligibility verification, authorization management, claims editing, payment determination, and remittance/explanation of payment to providers. HCS provides a state-of-the-art claims payment system that includes:



- Dedicated program lead team and backup support teams
- Insurance standard auto adjudication rate
- Medicaid and Medicare rates, as applicable
- Customized monthly, quarterly, and annual reporting
- Dedicated customer service call tracking for clients
- HIPAA administration

- Utilization review and large claim management
- Electronic invoicing
- Claim cost management technology
- Internal daily claims audits of 10% of all claims (industry standard is 2%)
- Medical management on staff to negotiate directly with providers
- Claim edits, with fraud/abuse detection system used on 100% of off-site provider and outpatient facility claims
- Repricing and negotiation of out-of-network claims to obtain maximum benefits

### Third-Party Insurance Eligibility

Wellpath will continue to provide medically necessary healthcare services while also being proper stewards of limited taxpayer resources. We assist in deferring eligible inpatient hospitalization expenses by:

- Accounting for adjustments and reimbursements from applicable sources
- Ensuring that hospitals are aware of third-party payer options
- Obtaining prior authorizations and making co-pay arrangements with hospitals and providers

Intake staff ask arrestees about insurance coverage and document the response. Private insurance carriers have financial responsibility when a patient leaves the correctional facility for outpatient or inpatient services, provided the patient's insurance premium is paid and current. Coverage typically includes services provided by physicians, hospitals, or other freestanding facilities.

When an insured patient requires off-site services, Wellpath notifies the service provider of the appropriate agency to invoice. Providers that obtain authorization from the insurer are responsible for billing the insurance carrier. The patient is responsible for co-pays or deductibles.

If a patient is uninsured, we will work with the County to identify a willing service provider and negotiate rates.

The Wellpath Care Management system contains information on payment responsibility for off-site services. The system interfaces with our claims system, so if a service provider inadvertently sends us an invoice, we advise them of the appropriate location to resubmit their invoice for payment.

### Medi-Cal Program Inmate Program (MCIP)

Wellpath will continue to coordinate with the County to facilitate the Medi-Cal Inmate Program for eligible patients who require hospitalization. If an uninsured patient requires hospitalization, a Medi-Cal application is completed by Social Services or the Humboldt Public Health Department on the patient's behalf. Wellpath will provide needed documentation to facilitate enrollment. The hospital will bill Medi-Cal in a timely manner.

## 5.6 Inmates Outside the HCCF Facility

Wellpath understands and acknowledges health care services are intended only for those in custody of the Humboldt County Sheriff's Office (HCSO). Wellpath also understands this includes those in custody of jurisdictions outside of the HCSO that have been accepted for housing by the Facilities.

## 5.7 Medication Administration

Wellpath provides written systems and processes for the delivery and administration of medications based on each facility's layout and procedures. We have tailored medication pass for timeliness and accuracy of the process, including coordination with security staffing and mealtimes to ensure accurate and effective medication administration.

Appropriately California-licensed personnel administer medications, including over-the-counter medications. Our proposed staffing plan provides nursing coverage for medication pass at least twice a day in general population and more frequently as needed for patients in medical housing or observation, per physician's orders.

Trained healthcare personnel administer medications within 24 hours of when the pharmacotherapy was ordered. Wellpath staff will continue to educate patients on prescribed pharmacotherapy when it is ordered and document the education in the patient's medical record.

Wellpath provides orientation training and mandatory continuing education regarding medication administration and preventing medication errors. We do not permit the pre-pouring of medications and we monitor the medication delivery process to ensure it does not occur.

Nurses observe patients taking medications, especially when Direct Observation Therapy is required by physician's order. Wellpath trains staff on providing Direct Observation Therapy for medications subject to abuse, psychotropic medications, and those related to the treatment of communicable and infectious diseases.

### ***Medication Administration Record***

Healthcare staff at the Facilities document medication administration and missed doses in a patient-specific Medication Administration Record (MAR). These records become a permanent part of the patient's medical record. All information relative to a patient's prescription is recorded in the MAR, which includes instructions, injection site codes, result codes, and non-administered medication reason codes. If a patient misses or refuses doses on three consecutive days, or if a pattern is noted, we document the refusal and refer the patient to the clinician.

## 5.8 Special Medical Diets

The special needs screening performed at intake includes verification of medically necessary special diets. We will continue to make recommendations regarding special dietary needs based on the patient's medical history and physical evaluation. Wellpath only prescribes therapeutic diets, not preferential diets, and ensures that documented food allergies are medically indicated.

Wellpath staff work closely with the Facilities food services supervisor to communicate special dietary needs and share suggestions for recommended diets. We review patients with special dietary needs every 90 days and notify the patient and the food services supervisor if a special diet is no longer required.

## 5.9 Dental Services

CFMG/Wellpath provides on-site dental care to patients at the HCCF following NCCHC and CCR Title 15 standards. Consistent with the Wellpath care philosophy, we provide services on-site to the extent possible. Dental personnel licensed to practice in the State of California provide dental services, including but not limited to exams and treatment (e.g., emergency fillings and extractions).

The dentist is onsite at the HCCF eight (8) hours per week. Our staffing plan also includes eight (8) hours per week of a Dental Assistant to assist the Dentist, manage the treatment schedule and care requests, and properly maintain and sterilize equipment.

Dental Services for residents of the Juvenile Hall will continue to be conducted offsite.

### Oral Screening

Nursing staff conduct an initial oral screening at intake to identify complaints needing a referral. A more in-depth oral screening takes place during the comprehensive health assessment within 14 days to identify additional dental needs or required referrals. A Qualified Healthcare Professional (QHCP) performs the screening and educates the patient on proper oral hygiene.

Nursing staff receive documented training from or approved by a dentist on performing oral screenings, including questions to ask and what to look for. The oral screening includes:

- Taking dental history
- Documenting evidence of visible cavities/decay, missing restoration, or tissue abnormalities
- Providing oral hygiene instruction and preventive education
- Initiating dental specialist referrals, if needed

Unless an emergent need is identified during the oral screening, the Dentist will perform an oral examination within 12 months. The examination will include a dental treatment plan and X-rays.

### Dental Treatment Priority

Patients can request dental services through the sick call process. The Dentist evaluates the patient's initial oral screening, assesses the severity of the complaint, and schedules a dental exam. The Dentist prioritizes and schedules treatment, as needed. If non-treatment would compromise the patient's health, the appropriate dental services are provided as soon as possible.

The Classification and Priority Treatment program gives priority scheduling to:

- Patients needing emergency dental treatment, including but not limited to those with abscessed teeth, trauma, and severe facial swelling
- Patients with chronic medical conditions such as diabetes, heart conditions, or any condition that compromises their immune system

### Emergency Dental Care

Emergency dental services are available, as needed. Medical staff evaluate the emergency following dental emergency protocols and refer the patient to an off-site emergency or dental provider if clinically appropriate. Wellpath staff coordinate transportation and security with facility staff.

A medical practitioner evaluates patients needing emergency dental care and provides appropriate intervention until the patient can be seen by a dental practitioner or transferred for emergency care. Dental needs are categorized as **emergent** or **urgent**: Emergent intervention is provided within four hours; urgent intervention is provided within 48 hours by a medical practitioner. Emergent and urgent dental needs are addressed by a medical practitioner until a dentist is available.

EMERGENT dental conditions include:	URGENT dental conditions include:
<ul style="list-style-type: none"> <li>• Tooth avulsion</li> <li>• Suspected fractured jaw</li> <li>• Difficulty breathing or swallowing due to swelling from a tooth abscess</li> <li>• Uncontrollable bleeding</li> <li>• Acute cellulitis compromising the airway</li> </ul>	<ul style="list-style-type: none"> <li>• Pericoronitis</li> <li>• Heavy calculus accumulation with inflammation</li> <li>• Visual evidence of decay</li> <li>• Visual evidence of missing filling(s)</li> <li>• Swelling surrounding affected tooth/teeth</li> <li>• Redness of gingival surrounding affected tooth/teeth</li> <li>• Drainage from affected tooth/teeth</li> <li>• Generalized mild facial/cheek/jaw swelling without compromise to airway</li> </ul>

### Quality Assurance

Wellpath completes regular dental audits to ensure the provision of appropriate services at each facility. Dental audits are designed to ensure, at a minimum:

- Proper PPE is worn when treating patients
- Patients are wearing protective eyewear when receiving treatment
- Instruments are properly sterilized
- Instrument counts are logged properly
- Weekly spore counts are conducted regularly
- Completed dental screening training and competency assessment for nursing staff
- Proper maintenance of equipment logs
- Current certifications for anyone taking dental X-rays
- Sharps counts are conducted and logged properly
- Peer reviews are current on the dentist

## 5.10 Medication-Assisted Treatment (MAT)

Wellpath aims to provide a consistent, reliable continuum of care for patients suffering from substance use disorder (SUD) throughout their incarceration experience and beyond. We strive for a world where fewer lives are lost, addiction is treated as a disease rather than a criminal activity, and access to successful treatment is available to the millions of Americans whose lives are affected by addiction.

Wellpath works to meet this goal by working with our correctional partners to allow us to continue medication-assisted treatment (MAT) for patients who were receiving treatment in the community before their arrest. We also aspire to induct new patients into treatment while they are incarcerated. We know if we can stabilize someone’s addiction while they are incarcerated, the likelihood of community follow-up increases and the risk of overdose death following release decreases.

MAT includes the use of FDA-approved medications, in combination with counseling and behavioral therapies, to treat substance use disorders as a medical disorder. There are three FDA-approved chronic care medications used to treat OUD: methadone, buprenorphine, and naltrexone.

## MAT is More Than Just Methadone

**MAT Therapies wrap counseling, behavioral health, and other services around medication regimens designed to fight physical symptoms and cravings.**

	 Methadone	 Suboxone	 Naltrexone/Vivitrol
Primary Reasons and Effects of Treatment	<ul style="list-style-type: none"> <li>"Full agonist" opioid with side effects including overdose potential</li> <li>Satisfies cravings but does not create euphoria or intoxication</li> <li>Primary indicators of methadone treatment are high risk of resuming illicit drug use or need for daily monitoring of patient</li> </ul>	<ul style="list-style-type: none"> <li>"Partial agonist" – binds preferentially to the opioid receptors of the brain to relieve cravings and withdrawal symptoms.</li> <li>Exhibits a "ceiling effect" – very difficult to consume enough to become euphoric, intoxicated, or in opioid overdose</li> <li>Gaining momentum as the <b>primary</b> option for treatment among both providers and patients</li> <li>Suboxone (buprenorphine) often prescribed alone or in combination with naloxone</li> </ul>	<ul style="list-style-type: none"> <li>Blocks opioids from activating receptors, neutralizing their effect</li> <li>Does not treat cravings or symptoms of withdrawal, although patients on 28-day injectable Vivitrol has been shown to reduce cravings</li> <li>Not an opioid, thus non-addictive and non-intoxicating</li> <li>Generally prescribed as injectable for patients with strong social support structure</li> </ul>
Who can Prescribe?	<ul style="list-style-type: none"> <li>Administered only through a licensed Opioid Treatment Program (OTP), which are regulated at the state and federal level</li> </ul>	<ul style="list-style-type: none"> <li>DATA 2000-waivered providers with a DEA "X" license: MDs, NPs, and PAs can prescribe with a waiver</li> <li>New regulations have expanded to include nurse midwives and anesthetists (CNM/CRNA) until 2023</li> </ul>	<ul style="list-style-type: none"> <li>Any provider with ability to prescribe drugs – no special waivers or treatment centers required as it is not a controlled substance</li> </ul>

Pre-2002

➔

Present-Day/New Therapies for MAT

### Wellpath's MAT Experience

Wellpath is a leader in MAT programs for addiction treatment and recovery within correctional facilities. We have been assisting our local government and our state clients with MAT since 2016.

Wellpath currently provides MAT in **more than 70 correctional facilities**, with many more programs in development. Our team includes **250 somatic physicians and mid-level providers with DEA-X waivers**, plus more than a dozen Board Certified Addiction Specialists, many of whom have presented nationally on MAT.



Of the 70 MAT programs Wellpath currently manages, two are fully licensed jail-based Opioid Treatment Programs (OTPs) which dispense methadone on site: in Alameda County, California and Essex County, Massachusetts. Each program meets industry standards in addition to federal (Drug Enforcement Administration), state, and local laws and regulations. **Our OTP for Alameda County is accredited by the NCHC.**



### Wellpath's MAT Program

Wellpath's MAT program provides a safe and controlled level of medication to overcome the use of abused substances. The ultimate goal of MAT is full recovery, including the ability to live a self-directed life.

The primary goal of Wellpath’s MAT program is to remove any stumbling blocks to recovery while an individual is incarcerated. We have a multidisciplinary MAT implementation team to work with our client partners wishing to offer MAT services in some form, including full MAT programs.

Wellpath has a dedicated MAT program for local detention facilities led by National Director of MAT Programs, Stephanie Ruckman, DNP, FNP-BC, MBA, CCHP. Dr. Ruckman and a multidisciplinary MAT Implementation Team help clients understand the challenges associated with operating a MAT program and educate them on various available options based on their clinical workflows, staffing, counseling capabilities, costs, and other considerations. With our experience and dedicated team of subject matter experts, we can collaborate with the County and local community providers to design a MAT program tailored to your needs.



		
<b>CUSTOMIZED</b>	<b>SUPPORTED</b>	<b>CONNECTED</b>
Wellpath creates programs that fit site needs and site capacity.	Wellpath provides education and training to onsite staff and providers.	Wellpath ensures continuum of care as patients transition out of custody.

### Continuation of Care

The first step in a MAT program is to ensure that patients entering the correctional facility who were participating in a MAT program in the community are allowed to continue treatment. Our intake nurses ask all patients if they are currently involved in a treatment program for OUD. If the patient reports they were receiving MAT in the community prior to their arrest, the nurse will collect a release of information to verify current treatment. The nurse will also conduct a urine drug screen and contact a provider, who will see the patient to discuss continuing treatment.

If the patient has been receiving methadone from a community Opioid Treatment Program (OTP), we will work with the OTP to provide this medication. Many states allow for methadone to be delivered or picked up from the OTP and administered on site by our trained nurses in compliance with any state DEA regulations.

If a patient entering the correctional facility was receiving buprenorphine (Subutex, Suboxone, Sublocade) or naltrexone (Vivitrol), a Wellpath provider will manage these medications on site and the patient will not have to be sent off site.



All MAT continuation patients are placed on COWS protocol for evaluation and to monitor for withdrawal from any other substances. These patients will be scheduled to be seen by mental health staff to arrange treatment and by a medical provider for chronic care monitoring. Patients will be placed on the chronic care schedule every 30, 60, or 90 days based on condition stability, or more frequently at patient request.

### Induction

If the County chooses to implement a full MAT program, we will continue the induction of new patients into treatment. Patients will be screened and further evaluated to see if they meet the criteria for OUD. Wellpath staff will discuss the various treatment options with the patient and begin discharge planning to ensure patients have resources available to continue treatment after release.

The Wellpath MAT program includes four treatment protocols: buprenorphine, methadone, naltrexone, and/or abstinence. All offerings include mental health services to include group and individual counseling. Wellpath uses multiple factors to determine the best course of treatment: the patient’s addiction history, resources for medication availability after discharge, relapse on previous medications, and commitment to recovery. Patients who select MAT are started on medication and seen daily and/or weekly until the medication dosage is stabilized. Once the dosage is stabilized, the patient will transition to our routine chronic care provider schedule.

### Screening Tools

Opioid use disorder (OUD) falls under the general category of substance use disorder (SUD) and, according to the Diagnostic and Statistical Manual of Mental Disorders (DSM–5), is marked by:

- Compulsion and craving
- Tolerance
- Loss of control
- Withdrawal when use stops
- Continued opioid use despite adverse consequences

Specific DSM-5 Questions for OUD		
Taking opioids in larger amounts and for longer than intended?	No	Yes
Wanted to quit or cut down but have not been able to?	No	Yes
Spending a lot of time obtaining opioids?	No	Yes
Craving or strong desire to use opioids?	No	Yes
Repeatedly being unable to carry out things you need to do at work, home, or school due to opioid use?	No	Yes
Continuing use despite it causing interference in your social life?	No	Yes
Stopping or reducing important social, work, or fun activities due to opioid use?	No	Yes
Recurrently using opioids in dangerous conditions?	No	Yes
Consistently using opioids despite it making your health issues or mental health issues worse?	No	Yes
Being opioid tolerant - needing to use more to get the same high or getting less of a high with continued use of the same amount?	No	Yes
Do you get sick when you stop using opioids or do you continue to use to avoid getting sick?	No	Yes

## Diversions

All participants in our MAT programs sign consents for participation and are educated on participation expectations with mental health staff, as well as behavior expected with medication pass. Wellpath works to provide a very structured medication pass to ensure a safe, diversion-free medication pass. This requires teamwork of both medical and correctional staff. We understand when these medications are not properly handled and controlled, diversion issues can happen in a facility. Based on our expertise and time in the industry, we have developed an effective plan for medication pass.

We encourage all of our sites to have MAT medication pass occur separately from other medication passes in the medical area or in another secure location away from the eyes of the general population. All participants will have a mouth check prior to receiving medication, a swish, and swallow of water. A buprenorphine tablet is then crushed and placed under the tongue. The patient must remain observed for 10 minutes while the medication dissolves. The patient will then drink a larger glass of water, have another mouth check, and return to housing unit. Wellpath recommends the use of buprenorphine tablets because they are harder to divert and they are more cost effective. However, if the County prefers to use Suboxone strips, we will support this process using the same methods of observation while the medication dissolves.

We realize our patient population is very smart and creative and we continually adapt our practices to meet new challenges. We have also found in our facilities where MAT is readily available through medical and patients who need treatment are receiving treatment, diversion attempts go down. This has been the case in our statewide MAT program for the Maine DOC, whose program has grown to the point that they are able to offer MAT to anyone who is eligible and interested. With diversion literally non-existent, they are now able to pass medications in the routine medication line without extra observation time or security.

## Behavioral Therapies and Counseling

MAT research has focused on motivational and behavioral strategies that significantly increase the likelihood that patients will stay in treatment and remain abstinent. Non-pharmacological/psychosocial supportive services, such as individual and group counseling, have been shown to enhance program retention and positive outcomes. The results of numerous studies point to the effectiveness of enhanced counseling services in producing positive gains in treatment outcomes.

For clients who do provide counseling, we will conduct bio-psycho-social assessments and complete treatment plans and session notes. Counselors will hold group counseling for patients, conduct individual counseling sessions, participate in aftercare planning, and assist in the transfer process, as needed.

Wellpath offers cognitive behavioral therapy to help patients recognize, avoid, and cope with situations most likely to invite the use of drugs. We conduct motivational interviewing that focuses on readiness to change behavior and enter treatment. We also offer motivational incentives and positive reinforcement to encourage abstinence from drugs.

Time guidelines are tailored to meet the needs of the individual patient. These guidelines are site-specific, depending on what the facility can offer and any state-specific requirements. A patient will typically need more intensive/frequent counseling during the initial phase of treatment than in the

latter phases of treatment. As the patient shows signs of positive social change and abstinence, individual counseling can be held on a less intensive (reduced frequency) basis.

We encourage multiple short sessions throughout the month (e.g., 30-minute sessions, four times per month) depending on the patient's needs. Sessions should be held in the most appropriate timeframe for the patient to experience the maximum positive effect from the clinical session. Patients are also expected to attend clinical groups assigned by the primary counselor. Group counseling sessions may be assigned based on the patient's individual needs or at the patient's request.

Wellpath can offer a variety of individual and group treatment options, which will be adjusted to meet unique population needs and will take advantage of the strengths and experience of individual clinical staffs. Group topics may include:

- Alcohol and tobacco
- Sex, alcohol, and other drugs
- Negative emotions
- Relapse prevention basics
- The 12 steps
- Focus on AIDS
- Physical wellness
- Attitudes and beliefs
- Family matters
- Child development and parenting skills
- Money management
- Sexual abuse
- Addiction and loss
- Spirituality and personality
- Chronic pain and opioids
- Older adults
- Spirituality
- Stress and emotional well-being
- Anger and communication
- Introduction to self-help groups
- Sexually transmitted diseases
- Nutrition and exercise
- Problem solving
- Human needs and social relationships
- You and your parents
- Educational and vocational goals
- Insurance and consumer credit
- Compulsive sexual behavior
- Grief: Responding to loss
- Advanced relapse prevention
- Chronic diseases
- Seeking help for co-occurring disorders

### ***Optional Medication Assisted Treatment Staffing Plan***

As required by the RFP, Wellpath is providing an optional, separate proposal for the provisions of Medication Assisted Treatment (MAT).

#### ***Substance Use Disorder (SUD) Counselor***

Wellpath will provide 40 hours (1.0 FTE) per week of a Substance Use Disorder (SUD) Counselor to provide leadership and coordination to the provision of MAT services, which includes development, implementation, and supervision of the MAT program. This position will also handle counseling and discharge planning services to ensure patients are connected with community resources upon release.

#### ***Mid-Level Provider***

Wellpath will provide 4 hours (0.10 FTE) per week of a Mid-Level Provider dedicated to medication assisted treatment clinics and to provide care for patients enrolled in the MAT program.

### Licensed Vocational Nurse (LVN)

Wellpath will provide 14 hours (0.35 FTE) per week of a Licensed Vocational Nurse, 7 days per week, to provide dedicated medication pass for opioid-dependent patients enrolled in the medication assisted treatment program.

### Humboldt County Optional MAT Proposal Staffing

Wellpath MAT Program – 25 ADP										
Day Shift										
POSITION	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Hrs/WK	FTE	Facility
Nurse Practitioner			4					4	0.10	Jail
Substance Abuse Counselor	8	8	8	8	8			40	1.00	Jail
LVN (Medication Pass)	2	2	2	2	2	2	2	14	0.35	Jail
<b>Total Hours/FTE - Day</b>								<b>58</b>	<b>1.50</b>	
Weekly Total										
<b>TOTAL HOURS/FTE - WEEKLY</b>								<b>58</b>	<b>1.45</b>	

## 5.11 Ancillary Services

Wellpath will continue to authorize, schedule, and coordinate necessary diagnostic services, including phlebotomy, X-ray, EKG, and ultrasound services. Healthcare staff at the Humboldt County Facilities make referrals for diagnostic services and prioritize tasks for appointment scheduling through our **Care Management** system. We provide follow-up care for health problems identified by any health screenings or diagnostic tests.

Consistent with the Wellpath care philosophy, we provide diagnostic services onsite when possible. We will provide the necessary staff and supplies for on-site care and treatment of our patients, including medical, radiology, laboratory, dental, and other supplies.

### Laboratory Services



Wellpath provides on-site laboratory services through our national contract with **Laboratory Corporation of America (LabCorp)**. Our laboratory program includes supplies, timely pickup and delivery, and



accurate reporting within 24 hours on most labs. We ensure that qualified healthcare personnel are trained to collect and prepare laboratory specimens. All point-of-care lab services are processed on-site, including but not limited to:

- Dipstick urinalysis
- Finger-stick blood glucose
- Pregnancy testing
- Stool blood testing

A medical provider reviews and signs off on laboratory results, which we receive via a dedicated printer or directly into CorEMR. If test results indicate a critical value, LabCorp alerts the provider by telephone. The provider reviews laboratory results within 24-48 hours (72 hours for weekends and holidays) and immediately for STAT lab reports and any abnormal test results. Preliminary results, when available, receive a medical review.

Wellpath staff have been trained on laboratory policies and we provide them with a diagnostic procedure manual that includes reporting on STAT and critical values. We document diagnostic laboratory reports and follow-up care in the patient’s medical record.

We perform on-site services per the Clinical Laboratories Inspection Act (CLIA) and in compliance with the Clinical Laboratory Improvement Amendments of 1988. The laboratory program for the Humboldt County Facilities also complies with standards set forth by the American College of Pathology and state requirements for medical pathology, specimen handling, testing, and reporting.

### Lab Formulary

Wellpath and LabCorp have in place at the Facilities a lab formulary to manage laboratory costs. We receive discounted pricing for lab tests that we renegotiate regularly to ensure savings for our clients. The lab formulary includes the most commonly required tests, which allows us to expedite the ordering process by easily selecting the appropriate tests.



Non-formulary requests require pre-approval through our Care Management system. The Regional Medical Director reviews non-formulary requests and either approves them or suggests an alternative plan.

### Radiology Services

Wellpath provides radiology services on site to the degree technically possible through our Prestige Medical. We have an established schedule with Prestige Medical for on-site radiology services, including:



- Mobile X-ray services
- Ultrasounds
- Sonograms
- Doppler studies
- Holter monitor studies

We receive results electronically, via fax, or on paper. We log the type and number of X-rays completed and the results received. Medical personnel review the log daily to ensure timely reporting.

A board-certified radiologist reads X-rays and radiology special studies and provides a typed and/or automated report within 24 hours. The radiologist calls the Detention Facility for immediate intervention if needed. If notified of abnormal results, the site Medical Director reviews, initials, and dates X-ray reports within five working days.

We document and store digital images and radiology reports in the patient’s electronic health record. The site Medical Director meets with the patient to discuss results and establish a plan of care. Patient follow-up is noted in the health record.

### 5.11.1 Medical Waste



Wellpath has a national contract with Stericycle for the disposal of biohazardous and infectious waste at the Facilities.



Stericycle is a leader in the medical waste industry and specializes in biohazardous waste disposal. Through the services of Stericycle, Wellpath collects, stores, and removes infectious waste and sharps containers following state and federal regulations.

Biohazardous waste disposal is governed by policy and procedure, and includes proper containment, housing, and disposal. Stericycle provides red biohazard bags for waste disposal and biohazard boxes for bundling and disposal. Wellpath controls the proper disposal of sharps using disposal containers.

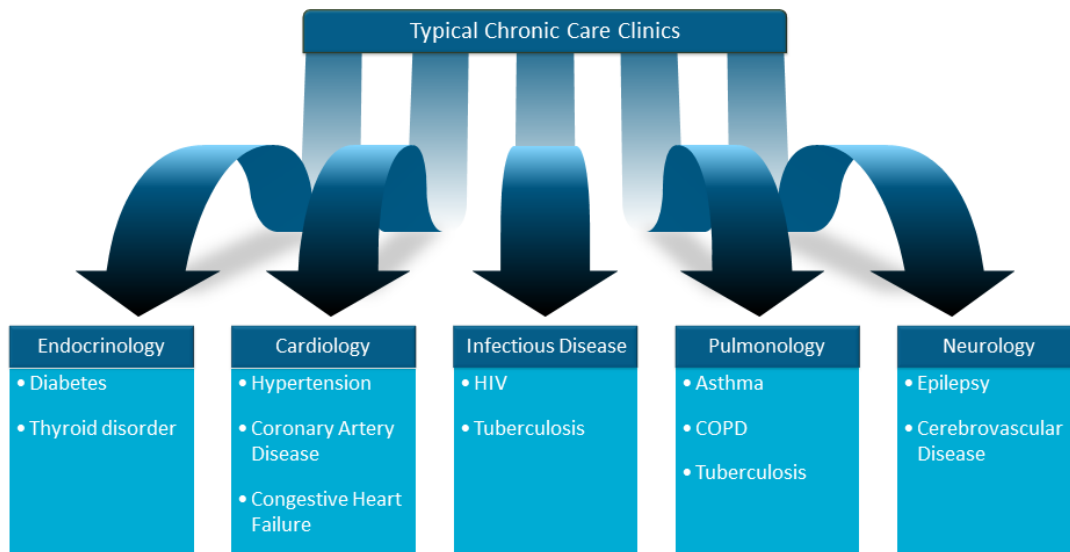
Wellpath has in place a pickup schedule approved by the County. Pickup frequency is typically based on volume and storage space availability. The HSA maintains pickup tracking forms on-site. We follow standard precautions to minimize the risk of exposure to blood and body fluids of potentially infected patients.

## 5.12 Special Needs

Many patients have special healthcare needs requiring ongoing medical supervision and/or multidisciplinary care. The Wellpath **Special Needs Program** at the Humboldt County Facilities focuses on the identification, referral, and treatment of patients with special needs, including chronic conditions (e.g., diabetes, hypertension, asthma, seizures, etc.) and communicable diseases (e.g., HIV, tuberculosis, etc.). This focus allows us to manage patient needs before they escalate and require off-site consultation or result in grievances and litigation.

Wellpath considers individuals with long-term healthcare needs related to chronic conditions or acute medical and/or mental health problems to be special needs patients. This includes patients who are mentally ill, developmentally disabled, and/or at high risk for clinical decompensation. We provide these patients with services that promote health maintenance and health improvement. The Wellpath Special Needs Program also emphasizes patient education to encourage adherence with treatment plans, both during and after incarceration.

Wellpath on-site specialty services and control of off-site costs start with an effective Special Needs/Chronic Care Program



## Special Needs Screening

Wellpath staff perform a special needs screening during the intake process and again during the comprehensive health assessment. This screening addresses housing, monitoring, and follow-up for special needs patients. Results are documented on a **Chronic Care Referral** form in the patient’s medical record.

Wellpath staff receive focused training and guidance on interventions based on the results of the special needs screening. If a patient requires ongoing care, we recommend specialty healthcare services, appropriate housing, work assignments, and program participation.

Patients with special needs are identified through self-report, during provider encounters, or by correctional staff. Self-reported conditions and referrals are entered into the patient’s medical record and verified by the medical provider. Referrals from correctional staff are managed the same as reports made by the patient directly to medical or mental health staff.

The image shows a 'Chronic Care Referral Form' from Wellpath. It includes a list of medical conditions with checkboxes: Asthma, COPD/Pulmonary, Cardiac, Seizures, Diabetes, Non-Insulin Dependent Diabetes, Other, Hypertension, HIV, Mental Health, Pregnancy, and Hep C. Below this is a 'Medications Verification' section with fields for 'Called 1st Attempt Date / Time', 'Called 2nd Attempt Date / Time', and 'Faxed'. It also has a section for 'Dispensing Agency Name and Phone Number' with checkboxes for Pharmacy, Doctor's Office, Family, and Other. There is a table for 'Medications' with columns for 'Medication(s) Name and Dose', 'Last Date Filled', and 'Date Last Taken'. The form also includes fields for 'Source', 'Contact', 'Provider Appointment Date', and a 'Form Completed By' section with fields for 'Printed Name', 'Signature', and 'Date'. At the bottom, there are fields for 'Patient Name', 'ID#', 'DOB', and 'Date'.

## Classification and Housing

Wellpath receiving screening guidelines address housing for patients with special healthcare needs, those who require monitoring, and those who may harm themselves or others. Wellpath recommends housing most suitable to the individual’s needs. We inform correctional staff of patients with special needs that affect classification and housing. If the patient requires enhanced monitoring, Wellpath staff notify the HSA or medical director.

## Individualized Treatment Plans

The physician or mid-level designee develops a written individualized treatment plan for patients with special medical conditions requiring close medical supervision, including chronic and convalescent care. The plan is based on medical history and physical examination findings. Patients with a mental health special need condition are seen by a Humboldt County mental health clinician who performs an initial mental health special needs assessment and develops an individualized treatment plan. Special needs treatment plans act as a reference for healthcare personnel involved in the patient’s care by providing instructions regarding diagnostic and therapeutic interventions, pharmaceutical therapy, special diets, and patient education.

Treatment plans also include short-term and long-term goals and the methods of pursuing them. They include information regarding the patient’s disposition, scheduled appointments, housing assignment, ability to function in general population, impact on programming, and frequency of follow-up. They also include medical or mental health instructions to healthcare providers and others involved in the care and supervision of the patient. We share these plans with the County and the Facility administration, as needed, to facilitate housing in the appropriate area of the Facility and ensure proper treatment of patients with long-term and individualized healthcare needs.

Medical special needs patients are typically seen by a physician or mid-level provider every 90 days, or at other intervals when medically indicated. We document this consultation in the patient’s medical

record and include the date and time of the consultation, the provider’s name and title, and new orders for the patient’s treatment. Wellpath clinicians determine the frequency of chronic care visits based on the patient’s condition(s) and recommendations from the **Wellpath Minimum Standards for Care of Chronic Disease**.

We see mental health special needs patients at least every 30 days for the first 90 days of placement into the mental health special needs program. After 90 days, the mental health clinician may reduce the frequency of each mental health special needs follow-up visit to no more than 45 days. Additionally, the mental health special needs treatment plan is updated at least every 180 days until the patient is removed from the special needs program.

When feasible, treatment plans maintain connections between patients and the community agencies that have been or will be serving them. Wellpath has a long history of establishing connections with local resources to ensure they are ready and willing to accept patients from incarcerated settings.

### Chronic Care Management

Wellpath provides a complete chronic disease management program that meets NCHC and CCR Title 15 standards. Our chronic disease management program is designed to reduce the frequency and severity of symptoms, prevent disease progression and complication, and foster improved function. Our multifaceted program includes disease-specific guidelines, clinical decision support tools, and a clinical informatics platform to guide population-based interventions consistent with national clinical practice guidelines for common chronic diseases.


Under the direction of Dr. Ziegler, Wellpath conducts on-site Chronic Care Clinics which can include the following (as needed):

- Infectious Disease
  - Tuberculosis
  - HIV/AIDS
  - Hepatitis C
- Hypertension / Cardiovascular
- Asthma/COPD
- Seizure Disorders
- Cancer
- Diabetes

### Chronic Care Guidelines

Wellpath practitioners follow disease-specific, evidence-based clinical decision support protocols to ensure continuity of disease management at the initial and follow-up patient encounters. Practitioners also use a set of established Minimum Standards for the Care of Chronic Disease to guide their treatment decisions.

Wellpath has developed clinical monographs that represent the best practices our practitioners use when treating specific medical conditions. These monographs reduce variability in the care provided to groups of patients with similar healthcare needs.

<p>For access to these recommendations, please follow these links:</p> <p><a href="http://www.ncbi.nlm.nih.gov/pmc/articles/PMC411111/">http://www.ncbi.nlm.nih.gov/pmc/articles/PMC411111/</a></p> <p><a href="http://www.upToDate.com/contents/management-of-diabetes-in-prisoners?search=diabetes&amp;source=search_result&amp;search=diabetes">http://www.upToDate.com/contents/management-of-diabetes-in-prisoners?search=diabetes&amp;source=search_result&amp;search=diabetes</a></p> <p><a href="http://www.upToDate.com/contents/management-of-diabetes-in-prisoners?search=diabetes&amp;source=search_result&amp;search=diabetes">http://www.upToDate.com/contents/management-of-diabetes-in-prisoners?search=diabetes&amp;source=search_result&amp;search=diabetes</a></p> <p><a href="http://www.upToDate.com/contents/management-of-diabetes-in-prisoners?search=diabetes&amp;source=search_result&amp;search=diabetes">http://www.upToDate.com/contents/management-of-diabetes-in-prisoners?search=diabetes&amp;source=search_result&amp;search=diabetes</a></p> <p><a href="https://www.hop.gov/resources/pdfs/diabetes-diagnosis-chronic-care-visit-periodicity-recom-exam-and-lab-schedule-can-be-found-in-Management-document.-This-can-be-found-by-https://www.ccmr.com/sites/depts1/Clinical%20Minimum%20Standards%20for%20Chronic">https://www.ccmr.com/sites/depts1/Clinical%20Minimum%20Standards%20for%20Chronic</a></p> <p><b>AUTHORITY</b></p> <p>Wellpath Clinical Department</p> <p>Site Medical Director</p> <p>Page 2 of 2</p>	<p style="text-align: right;"> <b>wellpath</b> To hope and healing.</p> <p style="text-align: center;"><b>Clinical Monograph: Diabetes</b></p> <p>The management of diabetes is similar in short-stay and long-stay settings; the diagnosis of this condition is typically relegated to longer-stay institutions. The accuracy of making a definitive diagnosis can be difficult in a short-stay system mostly due to poor diet, sedentary lifestyle and recent alcohol abuse. The focus of treatment in short-stay facilities should be on minimizing symptomatic hypoglycemia and avoiding diabetic ketoacidosis. In patients with suspected diabetes who are confined for a brief period of time, it is reasonable to implement dietary changes and encourage aerobic exercise with glycemic monitoring for a period of time prior to initiating medication. Patients who enter a short-stay facility on multiple diabetic medications should have these (or their equivalents) continued while their full clinical picture is being sorted out.</p> <p><b>Key Points for Practice Identified by this study:</b></p> <ol style="list-style-type: none"> <li>1. Medications and dietary therapy should be continued during confinement.</li> <li>2. Educate the patient on their role in the treatment plan.</li> <li>3. Patients should have access to medication at dosing frequencies that are consistent with their treatment plan.</li> <li>4. Annual exams for retinopathy should take place.</li> <li>5. Routine screening for neuropathy should take place through the use of periodic foot exams.</li> <li>6. Hemoglobin A1c should be checked at least every 6 months.</li> </ol> <p>Prison and other long-term facilities offer a more longitudinal opportunity to effectively manage both the diabetes and the long-term complications associated with it. Risk reduction and preventative maintenance become a routine part of the treatment plans for patients with diabetes in these environments.</p> <p>This monograph is meant to represent the clinical basis that we believe our providers should use when treating diabetes in all Wellpath facilities. It is not meant to be the definitive guide to diagnosis and treatment of this condition, nor is it meant to take the place of sound medical judgment.</p> <p>As a company, we endorse the use of the evidence-based guidelines set forth by the American Diabetes Association: Diabetes Management in Correctional Institutions monograph. Additionally, this is supplemented by other material from the Bureau of Prisons and UpToDate.com.</p> <p>Page 1 of 2</p>
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### Chronic Care Guidelines for Youth

Wellpath practitioners follow disease-specific, evidence-based clinical decision support protocols to ensure continuity of disease management at the initial and follow-up patient encounters. Wellpath uses the American Academy of Pediatrics and NCCHC Standards for Health Services in Juvenile Detention and Confinement Facilities as professional references for chronic care conditions in the juvenile population. Practitioners also use a set of established Minimum Standards for Care of Chronic Disease to guide treatment decisions. Wellpath has developed clinical monographs specifically tailored to juvenile patients.

### Adherence to Chronic Care Guidelines

The Wellpath CQI program includes screens such as Continuity of Care – Chronic Disease, Patients with Special Health Needs, and Special Needs Treatment Planning to ensure adherence to appropriate chronic care guidelines.

To ensure we provide optimal patient care, our clinical staff and leadership stay abreast of peer-reviewed research and developments, including emerging therapies, with a focus on their potential use in correctional medicine. We will assess new and emerging therapies and proposed care innovations for feasibility and appropriateness in the correctional setting throughout the term of the contract and in collaboration with Humboldt County. All such proposed therapies will be based on recommendations from the Centers for Disease Control and Prevention and/or other recognized authorities on the management of chronic diseases.

### Chronic Care Tracking

Wellpath tracks patients with chronic illnesses on a chronic care roster and reports these patients to the County each month. We maintain a list of chronic care patients that includes the date of intake, the date referred to the chronic care program, the date of a most recent visit, and the date of the next scheduled visit. We discuss statistics, such as the number of patients by chronic care diagnosis and number of chronic care patients seen in the clinic by the providers, at monthly Medical Administration Committee (MAC) meetings.

## 5.13 Wellpath Female Health Program

Wellpath understands the special healthcare needs of female patients and has established a program at the Humboldt County Facilities that addresses these needs following NCCHC and CCR Title 15 standards. We train medical staff working with the female population on the specialized aspects of care required.

The Wellpath female health program includes:

- Determining menstrual and gynecological problems at intake
- Determining pregnancy status by history and/or pregnancy testing, as appropriate
- Identifying activity capabilities for pregnant and non-pregnant female patients (medical clearance for work as appropriate)
- Screening for sexually transmitted diseases found at a significant frequency in the population
- Pap smear testing following the recommendations of major medical societies, modified to reflect individual patient medical needs



- Laboratory and diagnostic tests, including testing for gestational diabetes, HIV, and testing recommended by ACOG
- Observation for signs of toxemia, including urine testing for proteins and ketones
- Coordination of counseling and assistance to pregnant patients planning to keep their child, considering adoption, or seeking termination services
- On-site obstetrical care when it can reasonably be provided
- Postpartum care, including but not limited to lactation, monitoring for postpartum depression, contraception, and education
- Education on infant care
- Counseling regarding future pregnancies
- Family planning services before release

When a pregnant patient requires the services of an off-site OB provider, Wellpath staff coordinate with correctional staff and probation staff, as applicable, for transport to off-site scheduled appointments with Dr. Stokes. Wellpath provides designated correctional staff with an up-to-date listing of pregnant patients, anticipated delivery dates, and high-risk pregnancies to help them plan for required off-site travel.

### High-Risk Pregnancies

An obstetrical specialist manages high-risk pregnancies and pregnancies past 24 weeks. We facilitate testing that can be performed on-site, monitor patients with high-risk pregnancies, and refer patients for hospitalization when needed. A pregnancy is considered high risk if the patient:

- Has diabetes, cancer, high blood pressure, kidney disease, or epilepsy
- Has a history of tobacco, alcohol, or drug use
- Is younger than 17 or older than 35
- Is pregnant with more than one baby
- Has had three or more miscarriages
- Had pre-term labor, preeclampsia, or seizures (eclampsia), or gave birth to a baby with a genetic condition (such as Down Syndrome) during a past pregnancy
- Has an infection such as HIV, hepatitis C, cytomegalovirus (CMV), chickenpox, rubella, toxoplasmosis, or syphilis
- Is taking certain medications such as lithium, phenytoin (e.g., Dilantin), valproic acid (e.g., Depakene), or carbamazepine (e.g., Tegretol)

### Perinatal Care

Perinatal care (before, during, and after delivery) takes place in a hospital, following the obstetrical specialist's recommendations and the Emergency Medical Treatment and Labor Act (EMTALA). Wellpath provides appropriate postpartum care, including accommodation for lactation. When a patient returns to the Facility, she is seen by healthcare staff and placed under medical observation for at least 23 hours. Mental health staff also evaluate the patient's emotional status, as separation from a child can trigger self-harming behavior. Wellpath staff monitor patients for perinatal mood and anxiety disorders and refer patients to licensed mental health staff as indicated.

## 5.14 Wellpath Suicide Prevention Program

Suicide is a leading cause of death in jails, and Wellpath takes suicide awareness and prevention very seriously. We collaborate closely with the County mental health staff to provide the required care for the patient and reporting for the County and the Humboldt County Facilities.

Our Suicide Prevention Program is based on policies and procedures that address education, screening, intervention, special needs treatment plans, and ongoing care. The program includes enhanced staff training, assessment using the **Columbia-Suicide Severity Rating Scale (C-SSRS)**, and monitoring of individuals at increased risk for suicide. The County mental health staff support patients who have been affected by suicide and help them adjust to the situation.

### Enhanced Staff Training

Wellpath training for healthcare staff includes an intense focus on suicide prevention and emphasizes communication and teamwork between healthcare, mental health, and correctional staff. We train healthcare and correctional staff to recognize when a patient needs emergency mental health care, based on questions asked at intake, identified risk factors, and warning signs of self-harming behavior.

***In the front binder pocket of our original proposal, we have included a USB drive containing Wellpath Suicide Prevention Campaign videos for both adults and juveniles.*** This information is **CONFIDENTIAL AND PROPRIETARY.**

Ongoing and frequent staff training on suicide prevention is central to the Wellpath Suicide Prevention Program. Suicide prevention training is mandatory during new employee orientation and also is reinforced at least twice a year for all Wellpath employees and subcontractors. As part of our continual focus on suicide prevention and awareness, Wellpath’s Regional Directors of Mental Health distribute monthly suicide prevention bulletins to the company.

### Identification of Risk

The risk of suicide is highest during the first 48 hours of incarceration, as well as during the detoxification process and the following week. Because it is crucial to identify this risk immediately, the Wellpath receiving screening tool contains an enhanced suicide potential screening. Individuals having suicidal ideation or appearing to be in crisis receive an urgent referral to the County mental health staff.

Patients may report suicidal ideation to medical, mental health, or correctional staff. Correctional staff and family members also may express concerns. Regardless of the source, Wellpath staff promptly follow up and document these concerns. We take all suicidal behaviors and attempts seriously and our staff respond appropriately. We place patients believed to be a suicide risk on suicide watch until they can be evaluated by the County’s mental health staff and ultimately cleared by a QMHP.

Suicide Risk Factors
Previous attempt(s) (self, family member, friend) Impulsivity Substance abuse/withdrawal Negative interactions/bad news Mental illness Mood/behavior changes Hopelessness/helplessness Recent or upcoming court date
Suicide Prevention is Everyone’s Responsibility
Be intentionally aware Encourage communication Ask questions Make the patient your priority

## Referrals and Monitoring

Patients demonstrating self-harming behaviors, those identified as suicide risks, and those who appear to be in crisis receive an urgent referral to the County mental health staff for immediate evaluation. Wellpath recommends placing these patients on constant observation until mental health staff can complete the evaluation and determine an appropriate disposition. We increase monitoring appropriate to the level of risk. Wellpath suggests the following options for those at risk for self-harm:

- **Continuous Watch** – Constant observation of the patient
- **Staggered Watch** – Direct observation of the patient at staggered intervals not to exceed 15 minutes

Medical staff monitor patients on suicide watch daily. When a patient is released from suicide watch, the County mental health staff follow-up and develop a treatment plan addressing suicidal ideation and its re-occurrence and provide additional follow-up care, as needed.

## Notification and Reporting

Wellpath staff notify the HSA, Ms. Edmundson, and Medical Director, Dr. Ziegler, and Facility administrators of suicide attempts, which are considered a significant event and require a retrospective review. The retrospective review is a part of the critical clinical event (CCE) process and is completed by a multidisciplinary team that reviews all aspects of the incidents that led up to the event, as well as the emergency response. This report is then sent to the QI Committee to monitor, review, and report on the healthcare staff's response to critical clinical events. The QI Committee uses the root cause analysis problem-solving methodology to review the CCE.

## 5.15 Pharmaceuticals Services

Wellpath will continue to provide pharmaceutical services for the Humboldt County Facilities in accordance with all applicable laws, guidelines, policies and procedures, and accepted community standards. All services provided are in compliance with all state and federal laws, NCCHC, ACA, and CCR Title 15 standards, and the California State Pharmacy Board.

Our pharmaceutical management program includes formulary and non-formulary oversight; prescribing, filling, and administering of medications; record-keeping; appropriate licensure; Drug Enforcement Agency (DEA) management; and the secure and proper storage of all medications. All medications are prescribed by the Wellpath providers, licensed in the State of California, and are reviewed every 90 days, at a minimum.

### Pharmacy Provider



competitive pricing.

Wellpath will continue to subcontract Humboldt County's pharmaceutical services to **Correct Rx Pharmacy Services, Inc. (Correct Rx)**. Correct Rx is a full-service pharmacy, available 24/7, that provides accurate and timely dispensing and delivery. We have a national contract with Correct Rx, which allows us to receive



As our pharmacy vendor, Correct Rx, maintains all pharmaceutical licenses in accordance with State of California and federal regulations. They also provide:

- On-time delivery with accessible local backup pharmacy to ensure 24/7 availability
- Computerized systems for provider ordering through medication administration
- Inventory management and medication reordering
- Safe medication administration practices
- Simplified processes for emergency medication ordering and formulary exceptions
- Accurate medication order delivery
- Knowledgeable and accessible customer service available 24/7

### Delivery

Wellpath provides pharmacy services seven days a week, with a scheduled shipment of medications six days a week and local backup pharmacy services (**Red Cross-Eureka**) available on Sundays, holidays, and in urgent or emergent situations. We document all prescription orders in the patient's electronic health record.

### Emergency Medications

Wellpath does not delay medications for life-threatening, mental, or serious chronic conditions. Our list of "no-miss" medications facilitates this process following intake. We make every effort to verify and administer these medications before the next scheduled dose. We obtain and administer other medications within 24 hours.

Wellpath expedites orders for emergency medications. If there is an immediate need to initiate medication, we obtain it from the backup pharmacy as quickly as possible. We use local pharmacies to supply emergency prescription medications and as a backup for pharmacy services.

### Stock Medications

Wellpath uses in-house stock medications as necessary and allowable within state guidelines. If a needed emergency medication is not available from our emergency medication kit or starter packs, and the medication is not available quickly enough from the pharmacy provider, we order a minimum quantity from a backup pharmacy. The site Medical Director collaborates with the pharmacy provider to determine which medications need to be added to the emergency stock supply to help minimize future emergency orders.

### Formulary Management

Wellpath has customized a formulary for the Humboldt County Facilities to optimize efficacy and total cost of care, and we review the formulary regularly for updates. Immediate formulary changes, with the approval of the site Medical Director and facility administration, are incorporated with the release of new medications, when clinical information identifies new safety concerns, and when generic products become available.



Utilization is important for formulary management and development. Correct Rx reviews and provides evidence-based literature review articles specific to areas that may affect utilization and the cost-effectiveness of medications. Correct Rx also monitors pricing fluctuations daily. Correct Rx pharmacists receive daily price change reports for review, as well as weekly information from their wholesaler when

new medications are expected to receive generic approval and pricing. The site medical director reviews this information when assessing a medication’s formulary status.

Wellpath can provide a monthly **Formulary Management Report (FMR)** that illustrates monthly expenditures, usage, prescribing habits, and trends. We can also provide a formulary exception report listing all non-formulary medications prescribed over a period and sorted by prescriber, medication name, and patient. The report includes the medication’s name and strength, dispense date, inmate name and number, prescriber, cost per prescription, order stop date, primary therapeutic class, secondary therapeutic class, formulary status indicator, and total cost per medication dispensed.

### Formulary Exceptions

We ask individuals who report medication use at intake to complete a Release of Information (ROI) form, allowing the medication verification process to begin. A prescribing clinician (physician or mid-level provider) reviews verified medications and continues them as clinically indicated. We expedite medications for life-threatening or serious chronic diseases by obtaining them from the local backup pharmacy, **Red Cross - Eureka**.

Wellpath bridges non-formulary medications for up to 30 days to prevent a break in care while allowing time for a clinician to review the necessity of the medication. Given the nature of jails as short-stay facilities, we typically continue verified medications (formulary or not) throughout the duration of a patient’s stay, unless the patient reports side effects, poor response to the regimen, or a different medication is deemed more clinically appropriate.

The image shows a 'Formulary Exception Request' form. It contains several sections:
 

- Header:** 'Formulary Exception Request'
- Demographics:** Inmate Number, Site, Location, Patient Name (First, Middle, Last), Birth date, Social Security #, Alias, Custody Date, Anticipated Release Date, Requesting Provider, Gender (Male/Female).
- Exception Type:** Radio buttons for Bridge (for continuity of care), Routine (Max 90 day supply), and Immediate (Emergency fill, Backup Pharmacy Max 7 day supply).
- Psychotropic Drug:** Radio buttons for Yes/No.
- Request Date:** Text field.
- Drug Allergies:** Text field with 'NKA' as an example.
- Diagnosis Requiring this Drug:** Text field.
- Drug and dose req / probable duration of therapy:** Text field with 'x \_\_\_\_ days'.
- Pertinent history and clinical justification for this drug exception:** Text area.
- Justify the Non-Formulary usage:** Large text area.
- Verbal Order:** Fields for Taken by (Name), Given by (Physician), Date, and Time.
- Nurse Signature:** Text field.

To continue a non-formulary medication after the initial bridge order, the prescribing clinician requests continuation of the medication (to include a brief clinical rationale for the medication) through the Wellpath non-formulary medication request process. The Regional Medical Director, Dr. Shah, reviews non-formulary requests daily. Our HSA, Ms. Edmundson, is notified if a non-formulary medication is ordered without the Formulary Exception Request form.

### Generics, Narcotics, and Off-Label Use

Wellpath prescribes generic medications whenever possible unless the clinician justifies a brand name request. We track the percentage of generic versus non-generic use and provide statistical reports on all areas of pharmaceutical management.

We only administer non-narcotic medications to patients in general population. Patients requiring narcotic medications are housed in the appropriate non-general population for the period the medications are prescribed for appropriate medical oversight. In keeping with Wellpath policy, providers use sleep and pain medications only when clinically indicated.

Wellpath policy discourages the dispensing of medication (prescription or OTC) for any off-label use.

## Over-the-Counter Medications

Wellpath has established protocols to provide over-the-counter (OTC) medications to HCCF and HCJH patients upon consultation with the site Medical Director and Facility administration, who jointly approve patient access to non-prescription medications. Approved OTC medications are reviewed annually.

## KOP Medications

The KOP program at the HCCF gives patients immediate access to medications for an urgent medical need. It also helps reduce the amount of time healthcare staff spend administering medications. The KOP programs educate patients about their medications and promotes their responsibility for maintaining their state of health.

KOP medications are limited to those that may be safely self-administered with the proper education, such as inhalers or nitroglycerine. The list of allowable KOP medications has been approved by facility administration. We only give KOP medications to patients who need immediate access to them, based on their chronic care treatment plan (e.g., inhalers for those with severe COPD or severe, persistent asthma).

Healthcare staff at the HCCF instruct patients on the proper use of KOP medications. Patients must sign an informed consent statement acknowledging that the medication is only to be used as clinically directed, must be kept on person at all times, and must be presented for inspection to any officer or healthcare employee who requests to see it. Patients found to be using KOP medications improperly or abusing the privilege may have their KOP privileges limited or rescinded, based on a physician's review.

## Medication Renewals

The Wellpath system for renewals ensures continuous availability of medications for patients who require them. A clinician evaluates the need for continued medication, documenting the evaluation and re-order in the patient's health record. A County psychiatric provider evaluates patients needing psychotropic medications before renewal.

## Inventory Control

### *Storage and Security*

Wellpath stores medications and pharmaceutical supplies in secure, locked area in the Medical Units of the HCCF and the HCJH, respectively, approved by Facility administration. The medication room and all cabinets will remain locked at all times when healthcare staff are not present. Patients do not have access to any medication other than those administered by a qualified staff member.

Wellpath stores bulk supplies separately, taking inventory weekly and when they are accessed. We will continue to maintain inventory records to ensure adequate control.



### Controlled Substances

Wellpath stores a limited supply of controlled drugs on site, locked in the Medication Room, under the control of the responsible physician. The HSA or their designee monitors and accounts for these medications. Controlled substances must be signed out to the patient receiving them at the time they are administered. As an additional level of control, we treat certain medications that are not controlled, but have the potential for misuse or abuse, as controlled substances.

All Wellpath nurses are trained on the proper procedures for administering, storing, counting, and logging controlled substances. Class II, III, and IV drugs are counted at the end of each shift by one staff member going off duty and one coming on duty. Any count discrepancies must be reported immediately and resolved before the outgoing staff member leaves.

The image shows a 'Controlled Substance Usage Log' form. It includes fields for Patient Name / Book, Date Received / Transferred, Quantity Received / Transferred, and a table for recording usage with columns for Date, Time, Patient Name, and other details. There are also sections for Medication, Strength, and Disasters.

Wellpath emphasizes maintaining a clear “paper trail” to comply with DEA guidelines for accountability and record keeping. Counts are tracked in a blue spiral-bound Controlled Substance Log Book with an index and numbered pages to ensure a perpetual inventory and usage record. Controlled Substance Log Books remain on site for five years.

### Sharps and Supplies

Wellpath instructs new employees on handling sharp instruments, utensils, and supplies. Needles, syringes, and other high-risk items are secured in locked areas and signed out when used. Sharps are inventoried at each change of shift. Each employee is responsible for ensuring count accuracy and must not take a coworker’s word when conducting sharps counts. Used sharps are considered biomedical waste and are discarded in a leak-proof, puncture resistant container designed for this purpose.

### Disposal

Wellpath disposes of pharmaceutical waste in compliance with federal, state, and local laws and regulations. Medications that cannot be returned to Correct Rx (e.g., non-unit-dose medications, medications refused by the patient, and/or medications left by discharged patients) are destroyed. We make every reasonable accommodation to minimize the amount of pharmaceuticals destroyed. We conduct regular audits to remove discontinued or expired medications. Correct Rx provides a weekly report to alert staff of medications approaching their expiration date.

### Pharmacy and Therapeutics (P&T) Committee

Wellpath has an established Pharmacy and Therapeutics (P&T) Committee to monitor pharmaceutical processes and utilization practices. The P&T Committee is responsible for managing the formulary and will continue to help balance the efficacy, safety, and cost of certain medications by requiring prior approval. The site Medical Director, Dr. Ziegler, chairs the multidisciplinary P&T Committee which meets quarterly. We provide the Facilities’ administrators with copies of P&T Committee meeting minutes and related reports.

### Consulting Pharmacist Services

A consulting pharmacist reviews the on-site pharmaceutical program regularly in accordance with State of California regulations and CCR Title 15 standards. The pharmacist's review is documented, and a report is provided to the Wellpath Medical Director and the Facilities administrations. Our Quality Improvement Committee (QIC) reviews the report and establishes action plans for identified problem areas.

## 5.16 Quality Assurance Capabilities

Wellpath is dedicated to continuously improving our services and program offerings for our clients. Our policies and procedures, based on NCCHC and ACA standards, ensure our patients receive quality, compliant healthcare. We use proven performance monitoring techniques like our Continuous Quality Improvement (CQI) program, Medical Administration Committee (MAC), and peer reviews to evaluate our healthcare programs at the HCCF and HCJH.

### Continuous Quality Improvement Program

The Wellpath CQI program operates under the authority of **Chief Clinical Officer Thomas Pangburn, MD**, and **Vice President of Quality and Safety Mashekia Jones-Slack, DNP, RN, MHA**. The program ensures systems and programs provide superior healthcare services. The CQI program for Humboldt County ensures that clinical care delivery at the Detention Facilities meets or exceeds our high expectations and NCCHC and CCR Title 15 standards.

Wellpath will continue to maintain the site-specific CQI plan based on the scope of care required at the Humboldt County Facilities. The CQI plan assesses on-site and off-site healthcare services for quality, appropriateness, and continuity.

### *Scope of CQI Program*

Wellpath's data driven CQI program includes audits and medical chart reviews to ensure compliance with contract requirements and established performance measures. We conduct CQI studies to ensure services at each facility meet established minimum thresholds. We monitor relevant areas for quality improvement, including accreditations, credentialing, environmental inspections, emergency drills, nursing, intake, medication management, special housing, and ancillary services.

### Routine CQI Studies

Routine CQI studies examine areas where overlap or hand-off occurs, as well as other problem-prone, high frequency/volume, and risk management processes, including but not limited to receiving screenings, screening and evaluation at health assessment, special needs, segregation, treatment planning, suicide prevention, medication administration, initiating medication at intake, as well as processes exclusive to the facility.

The following sample CQI Calendars, for adult facilities and juvenile facilities, respectively, show monthly CQI screens broken out by the responsible party.

Sample CQI Calendar – Adult			
Month	Nursing	Site Medical Director	Mental Health
Jan.	<ul style="list-style-type: none"> <li>Chronic Care Services</li> </ul>		
Feb.	<ul style="list-style-type: none"> <li>Site-specific Study</li> <li>CQI Meeting</li> </ul>	<ul style="list-style-type: none"> <li>Scheduled &amp; Unscheduled Off-site Care</li> </ul>	<ul style="list-style-type: none"> <li>Suicide Prevention</li> </ul>
March	<ul style="list-style-type: none"> <li>Alcohol/Benzodiazepine Withdrawal</li> <li>Opiate Withdrawal</li> </ul>		
April	<ul style="list-style-type: none"> <li>Medication Administration</li> <li>Pregnancy Care</li> </ul>		<ul style="list-style-type: none"> <li>Segregation</li> </ul>
May	<ul style="list-style-type: none"> <li>CQI Meeting</li> <li>Initial Health Assessment</li> <li>MAT</li> </ul>	<ul style="list-style-type: none"> <li>Physician Chart Review</li> </ul>	<ul style="list-style-type: none"> <li>Suicide Prevention</li> </ul>
June	<ul style="list-style-type: none"> <li>Dental Care</li> <li>Dietary Services</li> </ul>		
July	<ul style="list-style-type: none"> <li>Receiving Screen &amp; Med Verification</li> </ul>	<ul style="list-style-type: none"> <li>HIV</li> </ul>	<ul style="list-style-type: none"> <li>Psychiatric Services – HEDIS</li> </ul>
Aug.	<ul style="list-style-type: none"> <li>Site-specific Study</li> <li>CQI Meeting</li> </ul>		
Sept.	<ul style="list-style-type: none"> <li>Ancillary Services</li> <li>Emergency Services</li> <li>Diabetes – HEDIS</li> </ul>		<ul style="list-style-type: none"> <li>Suicide Prevention</li> </ul>
Oct.	<ul style="list-style-type: none"> <li>Alcohol/Benzodiazepine Withdrawal</li> <li>Sick Call</li> </ul>		<ul style="list-style-type: none"> <li>MH Special Needs &amp; Treatment Planning</li> </ul>
Nov.	<ul style="list-style-type: none"> <li>CQI Meeting</li> <li>Patient Safety (review YTD)</li> <li>MAT</li> </ul>	<ul style="list-style-type: none"> <li>Infirmery Level Care</li> </ul>	
Dec.	<ul style="list-style-type: none"> <li>Annual Review of CQI Program</li> </ul>		<ul style="list-style-type: none"> <li>Suicide Prevention</li> </ul>

Sample CQI Calendar – Juvenile			
Month	Nursing	Site Medical Director	Mental Health
Jan.	<ul style="list-style-type: none"> <li>Chronic Care Services</li> </ul>		
Feb.	<ul style="list-style-type: none"> <li>Site-specific Study</li> <li>CQI Meeting</li> </ul>	<ul style="list-style-type: none"> <li>Scheduled &amp; Unscheduled Off-site Care</li> </ul>	<ul style="list-style-type: none"> <li>Suicide Prevention</li> </ul>
March	<ul style="list-style-type: none"> <li>Alcohol/Benzodiazepine Withdrawal</li> <li>Opiate Withdrawal</li> </ul>		
April	<ul style="list-style-type: none"> <li>Medication Administration</li> <li>Pregnancy Care</li> </ul>		<ul style="list-style-type: none"> <li>Segregation</li> </ul>
May	<ul style="list-style-type: none"> <li>CQI Meeting</li> <li>Initial Health Assessment</li> <li>MAT</li> </ul>	<ul style="list-style-type: none"> <li>Physician Chart Review</li> </ul>	<ul style="list-style-type: none"> <li>Suicide Prevention</li> </ul>
June	<ul style="list-style-type: none"> <li>Dental Care</li> <li>Dietary Services</li> </ul>		
July	<ul style="list-style-type: none"> <li>Receiving Screen &amp; Med Verification</li> </ul>		<ul style="list-style-type: none"> <li>Psychiatric Services – HEDIS</li> </ul>
Aug.	<ul style="list-style-type: none"> <li>Site-specific Study</li> <li>CQI Meeting</li> </ul>		
Sept.	<ul style="list-style-type: none"> <li>Ancillary Services</li> <li>Emergency Services</li> </ul>		<ul style="list-style-type: none"> <li>Suicide Prevention</li> </ul>
Oct.	<ul style="list-style-type: none"> <li>Alcohol/Benzodiazepine Withdrawal</li> <li>Sick Call</li> <li>Asthma Outcome Study</li> </ul>		<ul style="list-style-type: none"> <li>MH Special Needs &amp; Treatment Planning</li> </ul>
Nov.	<ul style="list-style-type: none"> <li>CQI Meeting</li> <li>Patient Safety (review YTD)</li> <li>MAT</li> </ul>	<ul style="list-style-type: none"> <li>Infirmery Level Care</li> </ul>	
Dec.	<ul style="list-style-type: none"> <li>Annual Review of CQI Program</li> </ul>		<ul style="list-style-type: none"> <li>Suicide Prevention</li> </ul>

### Site-specific Studies

Wellpath completes monthly CQI screens outlined in the CQI Calendar, plus at least one ad hoc screen each quarter to evaluate a site-specific issue presenting challenges. Examples of ad hoc screens include:

- Missed medication (investigative study)
- TB screening
- Health assessment (periodic)
- Grievances
- Communication with custody
- Initiating essential medications (return from the hospital)
- Prenatal and postpartum care (HEDIS and outcome study)
- Asthma outcome study

## Quality Improvement Committee

A multidisciplinary quality improvement (QI) committee directs CQI activities at the Humboldt County Facilities. The site Medical Director leads the QI committee, which also includes the HSA, site Safety Coordinator, Dentist, designated representative from the Department of Public Health, and appropriate Tuolumne County representative(s) from the Sheriff's Office. The QI committee is responsible for performing monitoring activities, discussing the results, and implementing corrective actions if needed.

The QI committee meets quarterly to review significant issues and changes and discuss plans to improve processes or correct deficiencies. CQI activity records are confidential. Discussions, data collection, meeting minutes, problem monitoring, peer review, and information collected as a result of the CQI program are not for duplication or outside review.

## Grievances

Our first responsibility is to provide access to care and treatment to meet the medical needs of our patients. We train and expect our staff to operate efficiently and appropriately while respecting those needs. Wellpath personnel receive grievance resolution training to learn how to address concerns at the point of contact before the patient initiates a grievance. Our record of reduced grievances and our excellent litigation history illustrate the exemplary care our team members provide.

The Wellpath grievance process follows national and CCR Title 15 standards and complies with the Humboldt County Facilities' policies. We provide standardized data reporting with full transparency of written grievances or complaints received from patients or concerned third parties (e.g., family members, advocates, lawyers).

“Looking back, I wish I had kept track of each time an inmate grievance was quickly unfounded, without further legal action, as a result of meticulous medical documentation. I can only speculate on the astronomical amount of time and money that [Wellpath's] thorough medical chart documentation potentially saved us.”

Capt. Byron Shelton  
Bell County, TX

## Resolution and Review

Wellpath staff respond to grievances, complaints, and inquiries as soon as is practical, generally within 72 hours of receipt. All members of the healthcare team attend to medical grievances, which include complaints such as not being seen promptly for a sick call request, medications not being started promptly, and healthcare staff conduct. The site Medical Director, Dr. Ziegler, or his designee resolves urgent grievances that involve an immediate need for healthcare services.

The HSA, Ms. Edmundson, or appropriate designee works with the Facilities administrators in the investigation, follow-up, and resolution of complaints and implements their recommendations. Ms. Edmundson or her designee coordinates with mental health, dental, pharmacy, or other appropriate service providers as needed to resolve complaints. When necessary, we conduct a face-to-face interview with the patient and participate on the Grievance Committee.

If the grievance is substantiated, Ms. Edmundson or her designee develops and implements a corrective action plan. The QI Committee and Medical Administration Committee (MAC) reviews and categorizes grievances to identify potential issues and patterns that exist or are developing.

### Grievance Reporting

Wellpath maintains a daily log of all grievances that includes the name of the person filing the grievance, the date and nature of the grievance, staff named in grievance if any, whether the grievance is founded or unfounded, staff responding, and date and nature of the response.

Wellpath submits a monthly report of patient grievances, which includes copies of medical grievance requests and their resolutions, to facility administration. We categorize all grievances received and provide grievance statistics as a part of the monthly health services statistical report. Grievance data includes, but is not limited to:

- Number of patients with grievances
- Number dissatisfied with staff conduct
- Number dissatisfied with medical care
- Number dissatisfied with dental care
- Number dissatisfied with mental health care
- Number dissatisfied with delay in healthcare
- Problems with medications
- Requests to be seen

## 5.17 Medical Records

Wellpath will continue to maintain up-to-date medical records consistent with NCCHC and CCR Title 15 standards, Humboldt County Facilities' policies and procedures, community standards of practice, and federal, state, and local law. Healthcare staff are responsible for entering patient information in the individual's health record.

Following the receiving screening, Wellpath staff initiate a comprehensive medical record that becomes the single source of medical, dental, and mental health information for the patient. Each record provides an accurate account of the patient's health status from admission to discharge, including on-site and off-site care. Wellpath staff updates patient health records with patient notes from the County's mental health staff. Medical records minimally contain:

- Patient demographic information (name, number, date of birth, sex, etc.)
- A problem list containing medical and mental health diagnoses
- Patient allergies
- Immunization records, if applicable
- Referral queues to track patient referrals
- Action items to ensure provider orders and documents requiring additional sign-off are addressed
- Date and time of each clinical encounter
- Signature and title of each documenter
- Wellpath standard form set, including but not limited to:
  - Chronic Care / Provider Care
  - Clinic Forms
  - Communicable Disease / Infection Control
  - Consents and Refusals

- Dental
- Detox / MAT
- Diagnostic
- Discharge Forms
- Health Histories and Physical Exams
- Health Service Request Forms
- Hospital / Emergency
- Infirmary / Outpatient Housing Unit
- Intake
- Mental Health
- Monitoring
- Nursing Documentation Tools
- Outside Records
- Pharmacy
- PREA
- Referrals
- Suicide Watch

### Confidentiality of Health Care Records

Wellpath adheres to laws regarding confidentiality of medical information. We will continue to secure health care records as required by law and other applicable state or federal statutes and regulations. We maintain records in accordance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Health Information Technology for Economic and Clinical Health (HITECH) amendment to HIPAA. We train all our employees on HIPAA and HITECH during orientation and each year thereafter.



### Access to Health Care Records

Wellpath manages the security and accessibility of patient health care records in compliance with state and federal privacy regulations. The site Medical Director, Dr. Ziegler, approves medical record policies and procedures and defines the format and handling of health care records. The HSA, Ms. Edmundson, controls access to health care records to ensure patient confidentiality. We maintain each patient's medical record separate from the confinement record and give the Humboldt County Facilities' administrators access to information needed to determine a patient's security rating, housing assignment, job suitability, etc.

### Transfer of Medical Information

Wellpath prepares medical information to accompany patients traveling off-site to a specialty appointment or emergency room, or when transferring to another detention facility. We send a medical transfer form with information required for the continuation of treatment with patients transferring to another facility.

## Ownership of Records

Wellpath maintains health care records for the length of a patient's stay in accordance with HIPAA rules and regulations. Wellpath serves as custodian of health care records; records belong to Humboldt County. Upon conclusion of the contract, medical records will remain the property of Humboldt County, and we will support a smooth transition of records.

## Release of Medical Information

Wellpath treats patient medical information as confidential and does not share it with outside entities, except as permitted by law. During criminal or civil litigation, where the patient's physical or mental condition is at issue, Wellpath will provide access to the patient's medical record upon written request.

## Records Retention

Wellpath retains inactive health care records according to NCCHC and CCR Title 15 standards, state law, and American Medical Association (AMA) requirements. If a Humboldt County Facilities' patient returns to the correctional system, we locate and reactivate the record.

## *CorEMR Electronic Medical Record System*

Wellpath uses our vendor-supported EMR system, CorEMR, at the Humboldt County Facilities. CorEMR is a web-based application specifically designed to operate as part of the healthcare delivery system inside correctional facilities. We will continue to work closely with the Humboldt County Facilities to provide continued, uninterrupted support of the CorEMR system platform.



We use CorEMR to collect and analyze health statistics on a regular basis. We have specific protocols, templates, and reports that have been developed for the CorEMR system. These unique features customize CorEMR to obtain additional operational efficiencies. Having this resource on site ensures that the benefits of the CorEMR system are fully realized at the Humboldt County Facilities.

The Wellpath IT team has configured CorEMR with accreditation standards in mind. We pride ourselves on enabling standardized configurations in each facility that have been vetted by our internal Steering Committee for best practice. Any additions or changes to the system are presented to the committee, which is comprised of clinicians, HSAs, IT personnel, and Wellpath executives, to ensure continued best practice in all sites companywide. In the event of contractual or county-specific obligations, CorEMR may be customized at the discretion of the committee.

Wellpath provides all operational support, maintenance, and scheduled upgrades of the CorEMR system, as well as training on new software as needed. We have integrated CorEMR with our Care Management system and provided an interface with Correct Rx and LabCorp.

Wellpath IT specialists are available 24/7 to troubleshoot any software or hardware problems that occur at our client sites. Our IT Department provides a **Help Desk Hotline** for support during normal business hours; after-hours emergency support is provided through a voicemail call-back process.

Wellpath offers the highest level of technical support programs in the industry. With nearly 300 client contracts, we have more experience in the installation, implementation, integration, and continued



support of electronic medical records systems in corrections. Nearly 150 of our client facilities use an electronic health record. **CorEMR is currently used by more than 70 Wellpath clients across the county.**

## 5.18 Health Education

Wellpath emphasizes the importance of patient awareness of their healthcare needs, issues, and diseases. We provide our patients at the Facilities with detailed information on self-care strategies, personal hygiene, healthy lifestyle choices, getting better sleep, coping with anxiety and depression, and maintaining optimal health. We also offer health education through group sessions for widespread issues such as MRSA, smoking cessation, fitness, and the flu.

Patient health education begins at intake and during patient-provider encounters. Patients with chronic conditions such as asthma or diabetes receive additional health education emphasizing proper health management and nutrition. We educate patients on their condition, their role in the treatment plan, and the importance of adhering to the plan. We also recommend lifestyle modifications and information on continuity of care after release. Patient education is documented in the medical record.

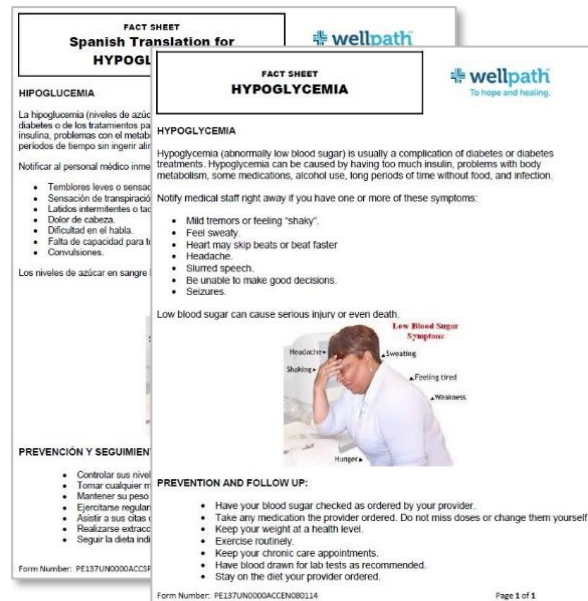
### Educational Materials

Wellpath will continue to collaborate with the County to customize a health education program for the specific needs of the Facilities' patient population, including, but not limited to, chronic and communicable diseases prevalent in Humboldt County.

Wellpath provides health education in multiple formats, including oral instructions during patient-provider encounters and written information such as brochures, pamphlets, orientation packets, and instructional posters. Educational materials are available in the clinic and other accessible areas. We can add electronic versions to kiosks or tablets in housing units with your approval.

Wellpath provides health information to patients verbally and in writing, in a language the patient understands, following NCCHC, Americans with Disabilities Act (ADA), and National Culturally and Linguistically Appropriate Services (CLAS) standards. We use other forms of effective communication, such as American Sign Language or other means of non-verbal communication, when necessary.

Patient education materials are available in English and Spanish and are easily translated into other languages as needed. Wellpath also uses a translation service to interpret any spoken language. Our goal is to ensure effective communication of health education with all patients, regardless of disabilities or language barriers.



## Medical Reference Library

Wellpath maintains a comprehensive library of course content for preventive health education that we have customized for a readily available training agenda and scheduled delivery. Healthcare staff at the Facilities have instant access to a medical reference library that includes basic reference texts related to diagnosis and treatment in a primary care setting.

### UpToDate

Wellpath staff can also access UpToDate® Clinical Knowledgebase and Support Tools, an online resource for evidence-based medical references and patient education materials on a wide range of topics.

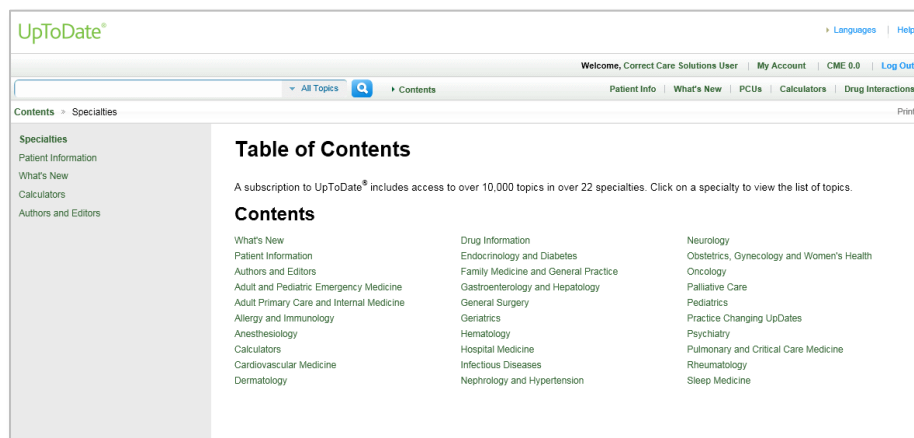
**UpToDate helps to increase the quality of patient care by allowing providers to print patient education materials and discuss them with the patient while they are together.**

UpToDate covers more than 10,000 topics across 22 medical specialties and offers more than 9,000 graded recommendations, 27,000 graphics, and 380,000 Medline abstracts, as well as references and a drug database. Content is reviewed and edited continuously and updated every weekday.

The screenshot shows the UpToDate website interface. At the top, there is a language dropdown set to 'English' and a search bar labeled 'Search UpToDate'. Below the search bar is a navigation menu with links for 'About Us', 'News & Events', 'Contact Us', 'Help', and 'Log in'. A secondary menu lists 'WHY UPTODATE?', 'PRODUCT', 'EDITORIAL', 'SUBSCRIPTION OPTIONS', 'SUBSCRIBE', and 'WOLTERS KLUWER HEALTH CLINICAL SOLUTIONS'. The main content area is titled 'Features' and includes a list of product features with brief descriptions and 'Learn more' links. A sidebar on the left contains a 'FEATURES' menu with links to various sections like 'MEDICAL CALCULATORS', 'SEARCH FEATURES', 'GRAPHICS SEARCH', etc. The footer contains contact information, a license statement for 'Correct Care Solutions', and a support tag.

UpToDate includes treatment recommendations based on the latest and best medical evidence. Recommendations are kept current with newly released studies and practice changes. Topics available within medical specialties in UpToDate include:

- Medical calculators
- Adult primary care
- Allergy & immunology
- Cardiology
- Critical care
- Drug information
- Emergency medicine
- Endocrinology
- Gastroenterology
- Nephrology
- Neurology
- Hematology
- Hepatology
- Infectious diseases
- Oncology
- Pulmonology
- Rheumatology
- Surgery
- Internal medicine
- Geriatrics
- Psychiatry
- Dermatology
- Palliative care



UpToDate is evidence-based and uses a literature-driven updating system. More than 450 journals are monitored by more than 5,700 doctors, editors, and authors. When new and important information is published, it is incorporated into the program. The keyword is “incorporated.” UpToDate is not a journal watch. **New studies are not simply added, but rather are placed in the context of what has already been published in that field.** This instant availability of continuously updated, evidence-based healthcare information, accessible from inside the medical record, helps medical staff provide the highest quality of care.

UpToDate also includes a continuing education feature that allows physicians and nurses to use their time in the program for credit of AMA PRA Category 1 CME/CEU credits toward maintaining their licenses and applicable certifications. In one study, **90% of users reported that UpToDate makes them a better doctor.** UpToDate is recognized as an official educational tool by multiple medical organizations, including:

- The Society of General Internal Medicine
- The American College of Rheumatology
- The American Gastroenterological Association
- The American Thoracic Society
- The Endocrine Society and the Hormone Foundation

## **Juvenile Health Education**

Wellpath understands the unique needs of the juvenile population based on their ongoing growth and development. We provide health education to juveniles with chronic conditions such as asthma or diabetes to reinforce the importance of proper health management. Understanding the importance of family involvement, we communicate with each juvenile's parents/guardians regarding his or her condition as appropriate.

Wellpath offers a variety of health education programs that can be customized to meet the specific needs of each facility. For example, in Louisiana, where we have provided statewide juvenile healthcare services for the Louisiana Office of Juvenile Justice (OJJ) since 2010, we implemented health education programs that have proven to be effective preventative tools with the youth population. Wellpath nurses coordinate with the Louisiana OJJ teachers to conduct health education in the classroom setting, which has boosted youth participation.

## **5.19 Reporting**

Wellpath seeks to provide the best on-site care possible while being fully accountable to the County. We expect to be measured by our performance, including reduced medical grievances; accountability as evidenced by operational and financial reporting; reduced staff turnover; and fewer off-site referrals. These are our goals, and we will continue to share the details of our performance by providing regular operational and financial reports on these criteria.

***Wellpath typically provides more clinical and operational reports than any other company in the industry.*** We will continue to provide a full set of operational reports customized to meet your specific needs. We deliver detailed monthly statistical reports for your review and use these reports to continually review the effectiveness of our program and improve overall program quality and efficiencies.

Wellpath maintains an extensive logging system for collecting data and statistics to analyze trends in the utilization of healthcare services. Demonstrating accountability through transparent reporting is a Wellpath core competency. In all medical operations, but especially in the corrections environment, it is essential to keep detailed accurate records that are readily available and easily accessed.

Wellpath's clinical and operational leadership teams use powerful business intelligence software, such as Tableau®, to ensure efficient delivery of services. Tableau tracks key indicators such as off-site referrals, inpatient/ER utilization, claim details, pharmacy utilization, labs, filled/vacant FTEs, and overtime. These tools allow us to identify trends as they emerge.



As stewards of the County, we will continue to be responsible and accountable for the success of your program at the HCCF and the HCJH.

## Monthly Reports

Wellpath will continue to provide monthly statistical reports regarding the operations of the Humboldt County Facilities' healthcare program, staffing fill rates to demonstrate compliance with the contracted staffing plan, and financial reports to aid HCSO with future budgeting efforts. Monthly reports delineate the status of the healthcare program, including potential problems and suggested resolutions.

Wellpath submits a customized report package to the County and Humboldt County Facilities' administrators or their designees, respectively. Monthly reports reflect the previous month/term workload, with data such as:

- Patient requests for various services
- Patients seen at sick call
- Patients seen by a physician
- Patients seen by a dentist
- Patients seen by a psychiatrist
- Infirmery admissions, patient days, and average length of stay
- Off-site hospital and emergency room admissions and cost
- Medical specialty consultation referrals and cost
- Intake medical screenings
- 14-day history and physical examinations
- Diagnostic studies
- Report of third-party reimbursement, pursuit, and recovery
- Percentage of inmate population administered medication
- Patients testing positive for TB, STDs, HIV, or HIV antibodies
- Patient mortality
- Number of hours worked by entire medical staff and compliance with contract staffing levels
- Other data deemed appropriate by the County

## 5.20 Proposed Staffing Plan

The program at the Humboldt County Facilities is managed administratively by the Wellpath Program Manager/Health Services Administrator (HSA), Karen Edmundson, RN. In addition to Ms. Edmundson's leadership as HSA, Wellpath will also continue to provide an on-site Medical Director, Dr. Ziegler, for 8 hours per week to oversee the medical operations of the clinic. Dr. Ziegler has been with Wellpath since 2016. This leadership team will ensure that all operations of our program at the Humboldt County Correctional, Northern California Regional, and Juvenile Hall facilities are operating efficiently without jeopardizing patient care.

We developed a staffing plan based on our significant experience and unique understanding of the needs of your facilities. We understand the volume, the average length of stay (ALOS), and the needs of the patient populations within your facilities.

Our proposal contains staffing consistent with the requirements established in your RFP, with adjustments that we believe address specific staffing circumstances and provide an enhanced staffing

plan. We look forward to the opportunity to discuss our plan in detail and make any scheduling adjustments, as needed.

### ***Administrative***

Our plan includes **40 hours (1.0 FTE)** per week of Program Manager/Health Services Administrator, **40 hours (1.0 FTE)** per week of Director of Nursing, and **8 hours (0.20 FTE)** of Medical Director coverage. These positions are 100% dedicated to the Humboldt County medical program and are responsible for its administrative and clinical oversight

### ***Nursing Coverage***

The Wellpath plan includes 24/7 nursing coverage at the HCCF to ensure assignments are adjusted as needed so that all daily sick calls, 14-day health assessments, medical observation unit care, intake/transfers, and clinic services are provided to Standards of Care. Our staffing for the HCCF includes a total of **336 hours (8.40 FTEs)** of Registered Nurse (RN) coverage (which does not include our Program Manager/HSA and Director of Nursing), and **252 hours (6.30 FTEs)** per week of Licensed Vocational Nurse (LVN) coverage.

Nursing coverage at the Northern California Regional Facility and Juvenile Hall includes **40 hours (1.0 FTE)** per week of Registered Nurse (RN) coverage and **9 hours (0.225 FTE)** of Licensed Vocational Nurse (LVN) to provide pill pass coverage.

### ***Health Care Practitioner (HCP)***

A Health Care Practitioner (Physician or Mid-Level Provider) is on-site for a combined **48 hours (1.2 FTEs)** per week for coverage across facilities to ensure the stabilization of newly committed patients with chronic or acute medical issues, conduct provider sick call five days per week, prescribe medications, and attend to urgent and emergent matters and referrals. This includes 8 hours (0.20 FTEs) per week of the Physician/Medical Director and one full-time (40 hours per week) Mid-Level Provider. The Physician or the Mid-level Practitioner share on call responsibility 24 hours a day/7 days a week.

### ***Dental Services***

Wellpath will continue to provide on-site Dental Services to the HCCF. Our staffing plan contains **16 hours (0.40 FTE)** per week of dental coverage. This includes 8 hours (0.20 FTE) per week of a Dentist and 8 hours (0.20 FTE) per week of a Dental Assistant.

### ***Support Staff***

Our staffing plan includes **1.0 FTE (40 hours)** of a Clerk position to provide administrative and clerical support to the HSA. Responsibilities of the Administrative Assistant will include tracking and maintaining statistical data; overseeing scheduling, tracking and follow-up of off-site activity; assisting with payroll management; and overseeing Care Management reporting for utilization management.

### Proposed Staffing Plan

Wellpath Proposed Staffing											
HCCF											
POSITION	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Hrs/WK	FTE	FACILITY	
<b>Admin &amp; Professional- 8-hour DAY SHIFT</b>											
RN -Health Service Administrator	8	8	8	8	8			40	1.00	All	
Mid-Level Provider NP/PA	8	8	8	8	8			40	1.00	All	
RN -Director of Nursing	8	8	8	8	8			40	1.00	All	
Clerk	8	8	8	8	8			40	1.00	All	
Medical Director - Physician			8					8	0.20	All	
Dentist				8				8	0.20	Jail	
Dental Assistant				8				8	0.20	Jail	
<b>Nursing Staff- "Floor Nurses"- 12-hour DAY SHIFT</b>											
RN	24	24	24	24	24	24	24	168	4.20	Jail	
LVN- Pill pass & Misc.	12	12	12	12	12	12	12	84	2.10	Jail	
<b>Total Hours/FTE - Days</b>	<b>68</b>	<b>68</b>	<b>76</b>	<b>84</b>	<b>68</b>	<b>36</b>	<b>36</b>	<b>436</b>	<b>8.40</b>		
<b>Night Shift (12hr)</b>											
RN	24	24	24	24	24	24	24	168	4.20	Jail	
LVN- Pill pass & Misc.	24	24	24	24	24	24	24	168	4.20	Jail	
<b>Total Hours/FTE - Days</b>	<b>48</b>	<b>48</b>	<b>48</b>	<b>48</b>	<b>48</b>	<b>48</b>	<b>48</b>	<b>336</b>	<b>8.40</b>		
<b>JRF/NCRF</b>											
POSITION	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Hrs/WK	FTE		
<b>8-hour DAY SHIFT Nursing Staff</b>											
RN	8	8	8	8	8			40	1.00	JH/NCRF	
Pill Pass LVN (JRF)						1	1	2	0.05	JH/NCRF	
<b>Total Hours/FTE - Day</b>	<b>76</b>	<b>76</b>	<b>84</b>	<b>92</b>	<b>76</b>	<b>36</b>	<b>36</b>	<b>42</b>	<b>1.05</b>		
<b>Evening Shift JRF-8hr</b>											
Pill Pass LVN	1	1	1	1	1	1	1	7	0.175	JH/NCRF	
<b>Total Hours/FTE - Night</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>7</b>	<b>0.175</b>		
<b>Weekly Total</b>											
<b>GRAND TOTAL HOURS/FTE - WEEKLY</b>								<b>821</b>	<b>20.525</b>		

## 5.21 Personnel Services

### Recruitment Program

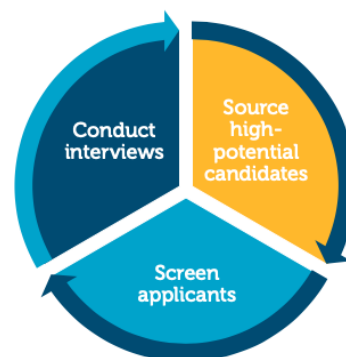
Wellpath uses industry-leading talent acquisition and employee retention techniques to consistently recruit and retain highly qualified employees. Our initiatives include strategic talent acquisition plans, competitive benefits programs, opportunities for professional development, and structured onboarding programs to educate new employees and welcome them to the Wellpath team. Our skilled and responsive Human Resources professionals facilitate the recruitment, development, and retention of healthcare professionals for Humboldt County.

#### Talent Acquisition

At Wellpath, we have the opportunity every day to improve the health of many of society’s most vulnerable and at-risk patient populations. Most healthcare professionals choose this profession to help others and give back to society. We provide them with one of the most meaningful ways to do that.

Wellpath’s dedicated Talent Acquisition team of physician recruiters, nurse recruiters, managers, and coordinators source high-potential candidates, screen applicants, and conduct interviews. They use competency-based behavioral interview questions and collaborate with our clinical and operational specialists to make informed hiring decisions.

Wellpath has a dedicated talent acquisition team of Physician Recruiters, Nurse Recruiters, Managers, and Coordinators



Wellpath performs primary source verification of credentials and licensure concurrently during the interviewing and screening process. We then select the best candidates based on qualifications and credentials, experience, references, interview results, and other information.

#### National Recruiting & Sourcing Tools

Wellpath recruiters are vigilant in their search strategies for talent, especially in a time of low unemployment rates for healthcare professionals. We keep our pipeline for the Humboldt County Facilities full by using effective tools to identify and communicate with candidates. We use strategic media partnerships to evaluate and rotate our posting needs daily. A few of those partnerships include TextRecruit; App Feeder; Indeed; and Connect, a Contact Relationship Management (CRM) program for engaging passive talent.

Wellpath also uses resources that share job postings and information across dozens of recruiting databases and job sites through a single source. Our strategic use of various databases ensures a continuous feed of the newest resumes and candidates into an Applicant Tracking System our recruiters use to find the best candidates for the Humboldt County Facilities in the shortest amount of time.





We invest in technology to promote our open positions and provide industry-leading people analytics. This helps us understand the growing needs in staffing, as well as the outcomes of our efforts.

Wellpath uses the **iCIMS Applicant Tracking System (ATS)** and **Contact Relationship Manager (CRM)** to maximize talent acquisition. Our HSA, Ms. Edmundson, works with a dedicated recruiter to advertise open positions in the ATS. The iCIMS ATS leverages mobile, social, and video technologies to manage the talent acquisition lifecycle. It helps us build CRM talent pools and automates our recruitment marketing, applicant screening, and onboarding processes. The iCIMS CRM contains more than 50,000 pipelined candidates, with more than 50% in the nursing industry. Our talent acquisition process is illustrated in the following figure.



### Internal Recruiting

Wellpath posts job openings internally and externally and gives internal applicants initial consideration for opportunities to help advance their careers. Wellpath employees in good standing can apply for internal opportunities after completing six months in their current role.

If a team member wishes to transfer to another position or location, he or she must validate they have informed their manager of their interest. The hiring manager or regional leadership typically conducts internal candidate interviews. We will continue to welcome input from you during the interview process for key positions.

### College and University On-Site Recruiting

Our proactive recruitment model is based on building relationships with resources in the communities we serve. We strive to hire locally since hiring individuals with a personal interest in our healthcare mission better serves our patients at the Humboldt County Facilities.

A key part of our recruitment plan includes working with local nursing schools and residency programs to attract healthcare professionals to a career in corrections. We have developed programs for nursing students at the Facilities, and we have expanded our outreach to residency programs. By increasing community interest and education regarding corrections, we can attract and recruit healthcare professionals who may have otherwise overlooked a career in correctional healthcare.

Wellpath has partnered with **College of the Redwoods** to advance our local recruiting for the Humboldt County Facilities.

### Equal Employment Opportunities

Wellpath is an Equal Employment Opportunity (EEO) employer with a thorough diversity policy in place to appropriately guide recruiting and hiring processes. We comply with all provisions of federal, state, and local regulations to ensure that no employee or applicant for employment is discriminated against because of race, religion, color, gender, sexual orientation, genetics, gender identity, marital status, age, disability, veteran status, national origin, or other legally protected status.

### Salary and Benefits

Wellpath offers competitive salaries and benefits to attract and retain qualified staff for the Facilities. We conduct local due diligence and salary surveys to ensure that our proposed rates are competitive within the surrounding area and to ensure that staff recruitment and retention efforts are successful. By showing our employees that they are a valued part of our company, we save our clients unnecessary operational expenses and added costs created by turnover.

Our benefits program exceeds market standards and is designed to attract and retain healthcare staff while recognizing the diverse needs and goals of our workforce. Wellpath also promotes retention through:

- Retention bonuses
- Referral bonuses for hard-to-fill positions
- Incremental increases of benefits like vacation and 401k vesting based on length of employment
- Annual salary increases based on performance and qualifications
- Monetary assistance and time off for CMU/CEU programs related to specific skill sets
- Employer tuition reimbursement program, which can be used for licensure renewal
- Malpractice insurance coverage for practitioners
- Company-sponsored gatherings
- Discounted offerings for theme parks, restaurants, movie theaters, and other activities

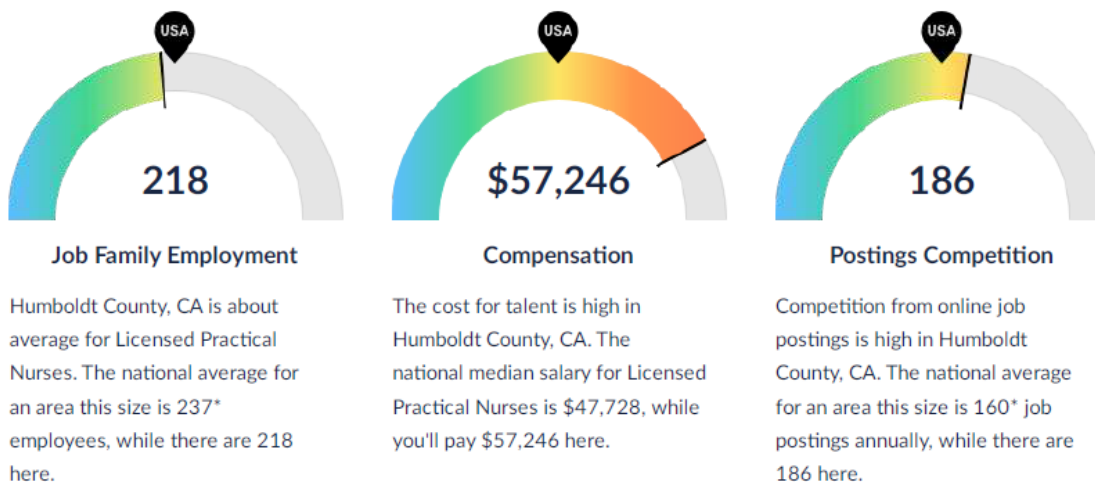
### Salary and Wage Analytics

Wellpath has invested in economic modeling data that allows us to evaluate each market based on real-time salary and market analytics. Our multidisciplinary team of experts across disciplines — including clinical, compensation, and recruiting — analyze and agree on our wage rates. This team examines

market supply, validates compensation data, and reviews the competition from companies advertising for the same positions in the market. These tools give us better insight to know where people live versus where they work, and how many actual jobs are being filled every month.

Following is an example of the economic modeling data we use to ensure our wage rates are competitive to hire and retain the best talent. This chart does not represent fully loaded rates including benefits and taxes.

### Aggressive Postings Competition Over an Average Supply of Regional Talent



### Employee Benefits Program

Wellpath offers a comprehensive, flexible benefits program for the Humboldt County Facilities that focuses on health and well-being. New hires, transitioning employees, and current staff can sign up for Wellpath benefits through our online and mobile enrollment system, which streamlines communications, education, forms, and all other benefit-related options. They also have the option of calling our **Benefits Service Center** to speak with someone who can answer questions and help them enroll.

Wellpath offers three medical plan options with a robust pharmacy program, two dental plan options, vision, and company-paid life insurance, as well as additional insurance options for employees, spouses, and children. We also offer short- and long-term disability plans to offset income loss in case of an emergency, as well as various supplemental insurance programs that pay staff directly for illness or accidental injury. Additionally, we offer a wellness program that encourages employees to take steps toward healthier lifestyles.

Affordability is top priority for all Wellpath benefit programs. We work closely with our vendors to ensure that we provide competitive benefit plans at affordable rates, and **we subsidize a larger portion of the total cost of healthcare** for staff with lower income. We also offer a Health Savings Account option with an annual employer contribution that allows employees to make pre-tax contributions to pay for doctor's visits, medications, and other health services.

Financial wellness is another important aspect of retention. Wellpath offers a traditional 401k with a discretionary company match, a Roth IRA, and a college tuition reimbursement program.

Wellpath offers a competitive paid time off program based on years of service, as well as paid holidays throughout the year. Following is a list of our benefits programs:

- Paid Time Off
- Paid Holidays
- Pregnancy Disability Leave
- Bereavement Leave
- Jury Duty Leave
- Military Leave
- FMLA/LOA
- Long-Term Disability
- Short-Term Disability
- Medical/Health Insurance
- Prescription Benefits
- Dental Insurance
- Vision Insurance
- Basic Life and AD&D
- Voluntary Life
- Family Life
- Tuition Assistance
- Employee Assistance Program
- Retirement/Pension, 401K, Employee Contribution
- Other Benefits (Wellness Program; Flex Plan; Legal/Identity Theft Program)

### ***Employee Retention Program***

Wellpath understands the importance, for continuity of care, of providing full-time staff members. Consistent staffing improves the quality of patient care and minimizes issues that can lead to grievances and lawsuits. We focus on prudent staff deployment to promote high efficiency, fewer mistakes, and improved morale.

Wellpath will continue to offer benefit-related incentives to entice those who may be considering a slightly higher rate of pay as per diem staff to commit to full-time employment. We attribute our retention success and low turnover at the Facilities to maintaining competitive salary and benefits packages, embracing diversity, rewarding superior performance, and providing meaningful work in a friendly environment.

### **Professional Development and Tuition Assistance**

A successful operation requires motivated employees who have the tools they need to succeed. Caring for and respecting patients at the Humboldt County Facilities requires hiring ethical and competent professionals and building upon their skills through continued training initiatives.

Wellpath has a dedicated organizational development department offering a full range of professional development opportunities that include training programs, continuing education, clinical exposure, promotion preparation, succession planning, and peer reviews. We are dedicated to our employees' continued development and long-term professional satisfaction to create lower turnover, reduced costs of replacement and training, and strengthened team spirit through mutual respect and recognition of each individual's contributions.

We encourage employees to take advantage of advancement and professional growth opportunities. We offer tuition assistance to employees to advance their skills and their career. Additionally, Wellpath employees and their children who have graduated high school can apply for Wellpath-sponsored college scholarships each year. We awarded seven \$2,500 scholarships in 2021.



### Nurse Outreach and Support

Wellpath has adopted several outreach techniques for our nursing professionals, including advanced training opportunities and open communication through the Nurse Channel, an online resource for Wellpath nurses. In addition to providing useful information, the Nurse Channel also recognizes Wellpath nurses with a record of outstanding job performance upholding our high standards for patient care.

### Employee Recognition

Wellpath attracts and retains skilled and competent personnel through several employee incentives, but incentives alone do not build loyalty. A friendly company culture also affects the long-term satisfaction of our employees. The primary reason for dissatisfaction in the healthcare field is feeling undervalued. At Wellpath, each person is treated with respect, incentivized, and rewarded for dedication and performance, and viewed as a valuable asset of our team.

The Wellpath employee recognition program enhances our ability to retain healthcare professionals throughout the life of a contract. Our program encourages positive behavior and builds a sense of pride in each team member. By recognizing our top-performing employees, we can influence employee morale, which positively impacts the quality of care we provide.

The primary program is the 5H Award, which represents the values by which Wellpath strives to exist: **Hunger, Honesty, Hard Work, Humility, and Humor**. We recognize employees whose contributions echo these values. At the Humboldt County Facilities, we incorporate employee recognition into our site operations, and we have in place a committee to recognize employees monthly and quarterly. These awards are based on attendance, customer service, teamwork, and overall performance.

Each year, the leadership team of each Wellpath business unit chooses one individual from each of the quarterly winners to be nominated for the President's Award. All quarterly award winners and nominees, and President's Award winners, are recognized on the Wellpath website and eligible for a monetary award, certificate of recognition, and a gift.

### Flexible Scheduling

When possible, Wellpath allows flexible scheduling to meet employees' needs. We employ part-time and per diem personnel to provide coverage for scheduled absences and to supplement full-time staffing needs.

### Wellness Program

Wellpath appreciates the importance of health and well-being for our employees. We encourage our team members to participate in a Wellpath wellness program that includes exercise programs, healthy eating tips, and other initiatives that promote a healthy lifestyle. Various Wellpath sites offer incentives or contests to encourage employee participation in programs that create a healthier staff, including smoking cessation and weight control programs.

Wellpath also offers telemedicine services through **AmWell** for employees to access care providers on their own schedule, 24/7. Primary care visits are covered by Wellpath at no charge to the employee. Specialty services such as mental health, nutrition, lactation support, and psychiatry are also available with a nominal co-pay.



## Employee Assistance Program

Wellpath offers an Employee Assistance Program (EAP) through Cigna. All Wellpath employees and their household dependents have 24/7 access to a range of free services and educational materials to help with a variety of life/work challenges and crisis management. Assistance is available through a confidential phone call or referral to a specialist for up to three sessions of in-person support. The Cigna EAP also provides discounted services and programs that promote health and wellness.

## Dare to Care

Wellpath established the Dare to Care Employee Assistance Fund to support our valued team members when they need it most. Employees and eligible dependents can apply for economic assistance during unexpected economic hardship. Employees may be eligible for assistance if they experience extreme or catastrophic circumstances beyond their control, including loss of property due to natural disaster life-threatening illness or injury, or loss of a family member.



We started Dare to Care in 2010 in response to the flooding that devastated the City of Nashville. Since its inception, ***the Dare to Care fund has provided \$1.3 million in financial assistance*** to more than 800 employees and their families in their time of need. In 2020, Wellpath team members contributed \$390,000 to the Dare to Care fund.



Wellpath partners with the Community Foundation of Middle Tennessee to manage all funds and award gifts. The application process is private, and requests are reviewed by an impartial and experienced third party. Dare to Care is funded through employee donations and matching contributions from Wellpath.

## Licensing and Certification

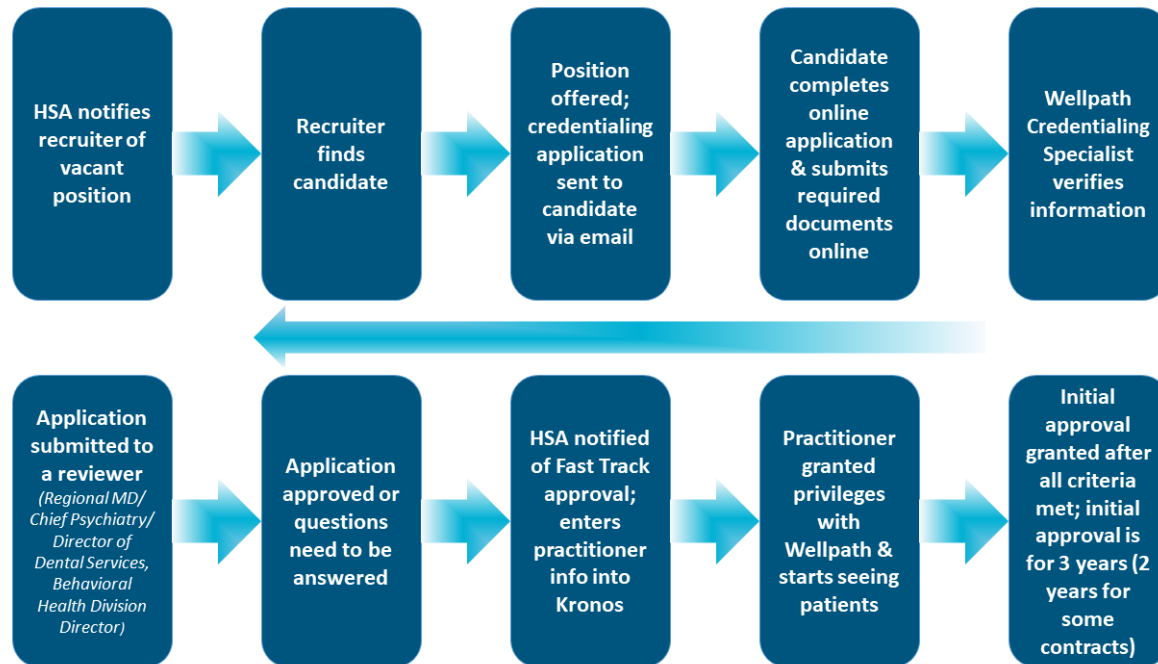
Medical services are provided at the Humboldt County Facilities by professionals fully qualified and appropriately licensed, certified, or registered in the State of California. Wellpath ensures employees and contractors are properly licensed or certified for their positions. We maintain proof of malpractice insurance for applicable employees.

Applicable employees are required to attest to completion of annual training necessary to maintain licenses and/or certifications. Healthcare personnel maintain current first aid and CPR/AED certification and attend appropriate workshops to maintain licensure.

## Credentialing and Privileging

Wellpath's credentialing process ensures that medical personnel remain current with state licensure requirements. Medical providers at the Facilities must complete the Wellpath credentialing process before starting work. The credentialing process (described in the following graphic) begins as soon as we have decided to make an offer of employment to the candidate. The Wellpath credentialing department oversees credentialing activities.

### The Wellpath Credentialing Process



### Interim Privileges (Fast Track)

Wellpath refers to the process of granting interim privileges as “fast tracking.” To initiate fast tracking, the health care practitioner (HCP) must submit the following forms:

- Completed credential application
- Copy of current state license (verified)
- Copy of current malpractice certificate of insurance (if not covered by Wellpath)
- Copy of DEA
- Copy of diploma
- Copy of certifications (if applicable)
- Copy of CPR
- Copy of resume

Wellpath credentialing specialists verify and submit the information listed in the following table. A committee reviews the HCP’s credentialing file and denies or grants interim privileges. Final initial approval is given after references and other required documentation are submitted and verified. Wellpath requires re-credentialing every three years on the anniversary date of the original fast track credentialing.

Credentialing Criteria and Verification	
Criteria	Verification Method
Valid, current, and unrestricted state professional license	Primary source verification through issuing state
No recorded revocation or limitation of professional license	Primary source verification and National Practitioner Data Bank
Current DEA privileges with no involuntary restrictions	Primary Source verification with Federal DEA
Current state Controlled Substance Registration with no involuntary restrictions (if applicable)	Primary Source verification with the appropriate state agency
Acceptable malpractice claims history	National Practitioner Data Bank
Graduation from accredited medical school (or other professional programs for non-physician professionals)	National Student Clearinghouse (NSC) for Primary Source Verifications or direct verification through the institution if not available through NSC; for Physicians and Physician Associates, a second verification occurs with the American Medical Association (AMA) report
Acceptable completion of an accredited residency program	American Medical Association (AMA) report
Never been subject to medical staff monitoring or special review activity of public record (or reasonably discoverable upon proper inquiry)	National Practitioner Data Bank
No recorded expulsion or suspension from receiving payment under Medicare or Medicaid programs	National Practitioner Data Bank and verification of no reports from the Office of Inspector General (OIG)
No recorded conviction or charge of a criminal offense	National Practitioner Data Bank
No record of disciplinary actions in prior states in which the provider practiced	National Practitioner Data Bank
Board certification in a listed specialty (where certification is applicable)	American Medical Association (AMA) report

### Personnel Files

Once we select on-site personnel, Wellpath provides the administrations at the Facilities applicable certification and licensing information. Before employment, Wellpath provides copies of background and credentialing information for professional staff, including appropriate licenses, proof of professional certification, Drug Enforcement Administration (DEA) numbers, malpractice insurance coverage, evaluations, position responsibilities, and current resumes.

We maintain personnel files of CFMG, Wellpath, and contract employees assigned to the Humboldt County Facilities at the Home Office and on-site. Facility administration has access to these files, which include copies of current registration or verification certificates for licensed practitioners. We provide updated data and other relevant information on request.

## 5.22 Orientation and Training

Wellpath provides appropriate orientation and training for all Humboldt County Facilities healthcare personnel. The lives and health of our patients depend on the knowledge, practical skills, and competencies of the professionals who care for them. We begin with the identification, validation, and recruitment of the very best people, then we orient them to our company culture and operations



through an established onboarding process. We also train Facilities correctional staff and probation staff in medical issues as requested.

### **Wellpath Orientation Program**

Wellpath provides a comprehensive three-phase training program for new employees. New staff members complete the Wellpath onboarding process and then receive ongoing skills/knowledge assessment through our **Performance Enhancement and Leadership Development** programs. Each new employee has online access to the Wellpath *New Employee Orientation (NEO) Curriculum* that outlines the required onboarding steps all healthcare staff must complete, as well as additional required onboarding steps for specific positions. All new employees participate in each of the three phases. The frequency and focus of each training phase are determined by the position and learning capacity of individual employees.

#### **Phase 1: Onboarding**

Critical to the success of each new employee is his or her initial experience with the organization. To ensure a smooth transition, we offer a three-part onboarding process: Orientation, On-the-Job Training, and Follow-up.

Virtual onboarding is available to all Wellpath nursing staff. Available weekly, modules are completed in the first 30 days of employment. This Zoom training is led by a Regional Director of Nursing (RDON) and allows for extension to on-site orientation shadowing. In addition to specific training topics, RDONs hold office hour calls each week that are open to any nurse. Wellpath advises new employees to join at least one call during their first three months.

The primary goal of virtual onboarding (which does not replace required training for new employees) is to promote consistency, connections, and confidence. New Wellpath nurses are introduced to correctional nursing and common workflows. They also review nursing assessment skills using Wellpath's Professional Nursing Protocols.

- **Onboarding Step 1: Orientation**  
Each new hire participates in an eight-hour learning experience, where they are introduced to our company culture and our policies and procedures. Physicians have additional requirements. The program establishes clear expectations and involves new employees in the success of the company. **In the front binder pocket of our original proposal, we have included a USB drive containing a Welcome to Wellpath video used during new employee orientation.** This information is **CONFIDENTIAL AND PROPRIETARY**.
- **Onboarding Step 2: On-the-Job Training (OJT)**  
On-the-job training is guided by standards, detailed checklists, and a qualified preceptor. While there are time schedules with expected milestones, the preceptors work with the new employees to ensure appropriate knowledge transfer. This step is not considered complete until the new employee feels capable of performing the job.
- **Onboarding Step 3: Follow-up**  
During this last step of the onboarding process, the new employee can provide feedback about his or her experience with the HSA. The HSA also shares information about his or her leadership style and performance expectations.

### *Phase 2: Performance Enhancement*

Performance enhancement training includes skills labs and webinars. Medical personnel participate in scheduled online training and in-service learning opportunities, such as “lunch and learn” sessions. We also offer webinars with a variety of Subject Matter Experts (SMEs) to staff members as applicable for their roles.

### *Phase 3: Leadership Development*

Leadership development training invests in the continued growth of our employees to develop leaders from within. Each training session varies in delivery and duration and is designed to strengthen the leadership competencies of our employees. Leadership development training is a collaborative effort between Wellpath’s Home Office and our leaders at the Humboldt County Facilities.

### **Wellpath Leadership Transition Academy**

Wellpath’s Leadership Transition Academy (LTA), held at our Home Office in Nashville, is a multi-day leadership development program for personnel in key leadership positions, such as the HSA, DON, Mental Health Director, Nurse Manager, Regional Medical Director, and Regional Mental Health Director.

The LTA program focuses on functional and behavioral competency development and offers attendees the chance to connect, learn, share, and collaborate on critical business issues. Our site HSA, Ms. Edmundson, attended the LTA program in 2019.

### **New Practitioner Orientation**

New Wellpath and CFMG Physicians and mid-level providers (practitioners) undergo a structured new practitioner orientation process focused on critical thinking and clinical decision-making in the correctional environment. The Wellpath Chief Clinical Officer, Thomas Pangburn, MD, or a designee presents the training. New practitioners receive an orientation manual that also serves as a reference tool for information related to their daily work in corrections.

Over the first 12 months of their employment with Wellpath, practitioners work with their assigned coach/mentor to ensure a thorough onboarding and to provide the resources for their clinical work in correctional healthcare. At the end of the first 120 days of employment, practitioners participate in a focused clinical review, and at the end of their first year, they participate in a peer review with their mentor or the Regional Medical Director.

Wellpath practitioners receive ongoing training and clinical decision support from our Clinical Department. Clinical leadership and Regional Medical Directors mentor and coach our on-site providers. Regional Medical Directors are available to our site medical staff for knowledge sharing and clinical decision support. The Wellpath Clinical Department conducts webinar events to train practitioners on timely and relevant correctional healthcare issues.

## Continuing Education

Wellpath offers ongoing professional development and training opportunities and will continue to work with the County to ensure on-site personnel receive corrections-specific training opportunities. We offer both in-house and community opportunities for continuing education programs specific to correctional healthcare. By encouraging our employees to take advantage of these opportunities, we are building a strong, professional staff equipped to meet your diverse needs.

While employees are ultimately responsible for their development, we provide Wellpath team members the proper tools to build on their knowledge and further their success. We maintain a Continuing Nurse Education (CNE) provider license that allows us to offer continuing education credits to nursing personnel as an employee benefit. Employees can complete a variety of CNE modules focused on topics commonly seen in the corrections environment.

**Wellpath’s Nursing Education Unit is accredited as a provider of nursing continuing professional development by the American Nurses Credentialing Center’s Commission on Accreditation.**



## Wellpath Academy Learning Center

Wellpath has partnered with Skillsoft for our Wellpath Academy Learning Center, which we use to deliver, track, and manage training content, including E-learning courses, classroom courses, other learning events, certifications, and licenses, and more.



Mandatory courses for all Wellpath employees include HIPAA, suicide prevention, sexual harassment, bloodborne pathogens, and hazard communication.

## In-Service Training

Wellpath maintains a video library and other reference materials that our team at the HCCF uses to build site-specific training programs. The Wellpath Organizational Development Department also offers self-study continuing education and training programs, which can be tailored to meet the specific needs of the Humboldt County Facilities. The self-study programs are available electronically and the organizational development team is available for assistance as needed.

The self-study training programs build on the foundation established during the orientation process and meet professional and legal standards. For example, Wellpath ensures that all staff members are trained on PREA standards by providing education, testing their knowledge, and providing certification based on demonstrated competency. Suicide Prevention training is mandatory for Wellpath new employees during orientation and is required twice annually for all Wellpath employees and subcontractors.

<b>CLINICAL TRAINING REQUEST</b> <small>(Please complete BOLD items and submit to your Regional Manager)</small>	
Requested by: _____	Location: _____ Date Submitted: _____
Timeline: Specific date(s) requested: _____	
Target audience: (check all applicable) <input type="checkbox"/> RN/LPN <input type="checkbox"/> MD <input type="checkbox"/> MHP <input type="checkbox"/> NP/PA <input type="checkbox"/> Dental <input type="checkbox"/> Other _____	
Type of Request: <input type="checkbox"/> Initial training <input type="checkbox"/> Repeat training - list previous date(s) _____	
Requested topic for training: _____	
Please describe any precipitating incident(s) that prompted this request: _____ _____	
<small>This section to be completed by Regional Manager</small>	
Review: <input type="checkbox"/> Approved <input type="checkbox"/> Denied	
Priority: <input type="checkbox"/> Expedited (within 30 days) <input type="checkbox"/> 31-60 days <input type="checkbox"/> 61-90 days <input type="checkbox"/> 91-120 days <input type="checkbox"/> Not Time Specific	
Comments: _____	
Regional Manager Signature: _____ Date: _____	
<small>Upon completion submit to Nursing Department via email (preferred) <a href="mailto:clinicaltraining@correctionalresolutions.com">clinicaltraining@correctionalresolutions.com</a> or FAX to 616-326-8728.</small>	
<small>This section to be completed by Nursing Services Team Member</small>	
Method: <input type="checkbox"/> Skills (Onsite) <input type="checkbox"/> Distance/Webinar <input type="checkbox"/> Self-Study (slides/handouts) <input type="checkbox"/> Other _____	
Date(s) scheduled: _____ <input type="checkbox"/> Clinical Training Calendar	
Assigned To: _____ Date Notified of Assignment: _____	
Date site notified: _____ Site contact person/notification given to: _____	
Nursing Approval: _____ Date: _____	

Our HSA, Ms. Edmundson ensures healthcare personnel receive regular training on topics specific to the Humboldt County Facilities. Wellpath identifies new topics regularly through our continuous quality improvement (CQI) program. Additional training may be requested through a clinical training request submitted to the Regional Director of Operations, David Garzoli. Ms. Edmundson maintains documentation of completed training in an individualized training record for each employee.

### 7 Minutes to Save

Wellpath is mindful of the need to provide timely guidance and education to both healthcare and correctional/probation staff at the Humboldt County Facilities. We developed our *7 Minutes to Save* campaign to present topics vital to the management of urgent and emergent issues encountered within a correctional setting, in short, easy-to-comprehend training sessions.



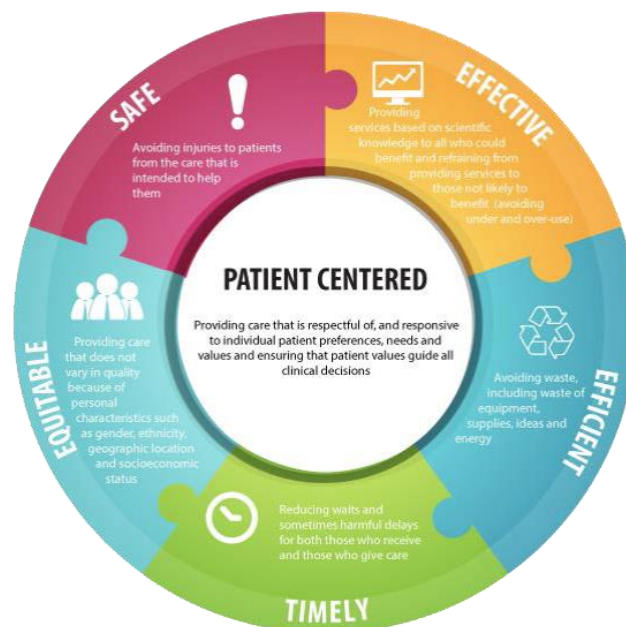
*7 Minutes to Save* is a Rapid Response Series designed to standardize our approach to trauma evaluation. The program addresses many topics, including suicide prevention, pregnancy, trauma, and optimized care for the Facilities' patients experiencing alcohol and drug withdrawal. Training topics for healthcare staff include:

- Alcohol & benzodiazepine withdrawal
- Altered mental status
- Chest pain
- Choking
- Head trauma
- Opioid overdose
- Opioid withdrawal
- Primary & secondary trauma survey
- Respiratory distress
- Seizures
- Serious abdominal pain
- Suicide risk reduction
- Triaging the surgical abdomen
- Use of force



The **Wellpath Clinical Department** has also developed a *7 Minutes to Save* rapid response series focused on patient care. The goal of the Patient Care Series is to equip clinicians with up-to-date information to guide their recommendations for diagnostic and therapeutic interventions. The training series emphasizes intentional concern for patient needs based on the **STEEP** principle, which dictates that patient care should be **Safe, Timely, Effective, Efficient, Equitable, and Patient-Centered**:

- **Safe** – Avoids injuries to patients from the care that is intended to help them
- **Timely** – Reduces waits and delays for both those who receive care and those who give care



- **Effective** – Based on scientific knowledge, extended to all likely to benefit, while avoiding underuse and overuse
- **Efficient** – Avoids waste, including waste of equipment, supplies, ideas, and energy
- **Equitable** – Provides consistent quality, without regard to personal characteristics such as gender, ethnicity, geographic location, and socioeconomic status
- **Patient-centered** – Respects and responds to individual patient preferences, needs, and values, ensuring that patient values guide all clinical decisions

### Specialized Nurse Education

 <b>SBAR</b>	
<b>SITUATION</b>	I am calling because.....
<b>BACKGROUND</b>	The patient's clinical background is..... (chronic conditions, allergies, etc.)
<b>APPLICABLE NURSING DATA</b>	I am concerned because..... (data to support concern, including vital signs)
<b>REQUEST/RECOMMENDATION</b>	What needs to be done for the patient? Discuss and decide.

The Wellpath Nursing Services Department promotes correctional nursing care focused on patients, formed in a collaborative and supportive environment, and grounded in evidence-based competencies and practice. This department is leading the charge in making Wellpath the leader in healthcare delivery through excellence in nursing practice.



Nursing services' primary focus is the development and delivery of nursing education through an assortment of training initiatives, including Continuing Nurse Education (CNE), independent/self-study, in-person clinical education, distance education (webinars, conference calls, etc.), and corrections-specific video training.

In addition to our cutting-edge training programs, we have developed educational materials that are placed conspicuously in the HCCF to remind nurses of basic protocols, like **SBAR** communication (Situation, Background, Applicable nursing data, Request/Recommendation).

Regional Directors of Nursing hold virtual office hours twice a week so DONs and other nurses can call and ask questions related to nursing practice, training questions, or resource needs. Additionally, our Vice President of Nursing Initiatives, Karina Purcell, RN, holds virtual office hours twice a week for our nurse leaders.

### Core Competency Training and Evaluation

Wellpath offers regular training opportunities for our nurses to keep their skills sharp on the latest clinical developments. The Wellpath Nursing Services Department distributes an annual clinical training calendar with monthly training assignments focused on a variety of core knowledge topics, such as patient evaluation, emergency response, suicide prevention, and withdrawal management. Each monthly training assignment includes a Clinical Skill Competency (CSC) component designed to provide technique refreshers and verification of clinical skills. The Clinical Skill Competency modules are part of the Clinical Skill Competency Evaluation Manual developed by the Wellpath Nursing Services Department to ensure our nurses are well equipped to care for our patients.

The purpose of the Clinical Skill Competency Evaluation Manual is to identify competent clinical practice, areas requiring additional training, and opportunities to improve skill sets through practice and re-evaluation. The manual presents nursing professionals with a variety of scenarios to assess their clinical competency and decision-making ability. Wellpath nurses must demonstrate the clinical skill covered in each CSC module to pass their evaluation.

Nurses are trained and evaluated on clinical skills essential for the effective and efficient delivery of healthcare in the correctional environment, including but not limited to conducting intake screenings, health assessments, and sick call. CSC evaluations are developed by the Corporate Director of Nursing in collaboration with the Patient Safety Officer, based on current evidence and peer-reviewed nursing resources. The manual is reviewed and approved annually and updated as needed.

## 5.23 Administrative Services

### Policies and Procedures

Wellpath has in place a site-specific Policies and Procedures manual with content meeting or exceeding NCCCHC and ACA standards. The manual is subject to the County's approval and is reviewed and revised as Wellpath and/or County policies are modified, and at least once a year.

A sample Table of Contents from our standard Wellpath Policies and Procedures Manual is available in **Tabbed Attachment D**. *Please note that this information is confidential and proprietary.*

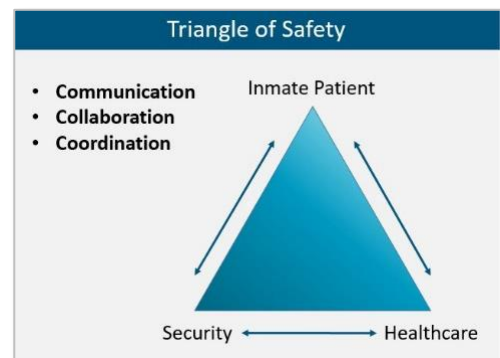
### Administrative Meetings

Wellpath will continue to participate in all administrative meetings with the County to evaluate statistics, program needs, problems, and coordination between correctional/probation, medical, and County mental health staff. We continually communicate with the County administration on contract matters, such as project coordination, status meetings, and status reports. Ms. Edmundson, as the liaison between healthcare and correctional staff/probation staff, promotes continued communication and cooperation between custody and care providers.

### Collaboration with Security Staff

Wellpath maintains a collaborative and open relationship with the County in the provision of services and operations, day-to-day activities, future planning, and evaluation of services. Ongoing communication between healthcare and correctional staff/probation staff ensures awareness of special needs or concerns among patients.

We provide facility staff the information necessary for classification, security, and control of individuals in custody. We notify correctional staff/probation staff if patients have special needs that may impact housing or program assignments, disciplinary sanctions, or transfer to another facility.



### Consultation Services

Wellpath will continue to provide consultation services to the County on any aspects of the healthcare delivery system at the Humboldt County Facilities. Services include evaluations and recommendations for new programs or architectural plans, staffing patterns for new facilities, alternate pharmaceutical and other systems, and other matters related to the contract upon which the County seeks the advice and counsel of Wellpath. We welcome collaboration as your partner.

Wellpath is known for implementing operational and clinical initiatives and providing clients with effective strategic planning services, based on our expertise in local detention centers. Our corporate management team, always available to our clients, has years of accumulated experience in the development and operation of healthcare units in state, county, municipal, and regional jails.



### The Wellpath Whiteboard Method

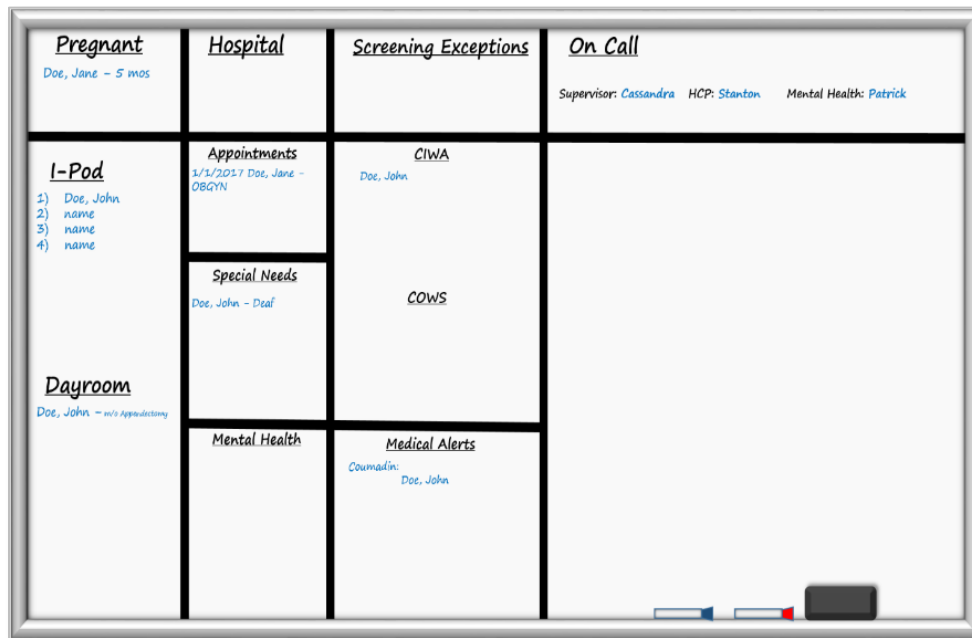
Wellpath uses a “whiteboard method” at the Facilities as a real-time HSA Command Center that promotes interactive communication among all stakeholders in the facility.



Wellpath staff advocate for our patients, execute policy and procedure and represent client needs while weighing potential liability and risk. Thus, the whiteboard enhances organization and streamlines information-sharing – with excellent patient care as the driving force.

The whiteboard method promotes the philosophy that every facet of our complex system is a known entity. A whiteboard is a reporting tool that demonstrates awareness of overall facility operations. It provides a snapshot of the site’s responsibilities for that day, that month, and that year, from high-priority medical cases and infection control statistics to site expenditures and upcoming events.

The whiteboard is divided into categories that support operational and clinical discussions during daily morning briefings at our sites. We invite and encourage facility administrators to attend these briefings. This visual map serves as an outline that provides shape and structure to the focused review of salient topics.



All teams are aware of the whiteboard’s importance in guiding daily activities at the Facilities and every staff member participates in daily whiteboard meetings. Key information from daily briefings is translated onto the board by leaders who are assigned to update specific areas. Every employee is

empowered to “own the board,” since its contents include pertinent items communicated via email, in-person conversation, or reported in a log. No information sharing is considered too small or insignificant.

## 5.24 Equipment

Wellpath is responsible for medical, dental, and office equipment required to operate the County healthcare program. We work with the County to ensure necessary equipment is available and maintain the equipment to perform all contracted services. Materials and equipment comply with American National Standards Institute (ANSI) standards or with the rules of the Food and Drug Administration (FDA) under the Safe Medical Devices Act.

Wellpath will continue to cooperate fully with the County to maintain the equipment requirements for the Facilities medical and dental suites. Additionally, we will continue to provide access to our corresponding national supplier contracts and negotiated volume discounts.

### Supplies

Wellpath will continue to provide supplies for on-site care and treatment, including laboratory, radiology, medical, and dental supplies. Our supplier, **McKesson Medical-Surgical**, is the nation’s largest distributor of wholesale medical supplies and equipment. **Our purchasing volume gives us the best pricing in the industry for goods and services.**



**Wellpath has a dedicated Procurement Team working with our vendor partners on a daily basis to ensure we have the right products, at the right time, for the right price available to care for our patients.** They also work cross-functionally with the Wellpath Clinical Team to better understand the needs of our patients.

Wellpath uses strict formulary management for medical supplies. We analyze each facility’s needs based on acuity and ensure competitive pricing on needed items. For any equipment purchases that are non-formulary, Wellpath uses a “three bids and buy” strategy to competitively price the items.

By leveraging Wellpath’s size and scale, the Procurement Team constantly evaluates our vendor contracts based on utilization, SKU rationalization, and supply chain optimization. **Wellpath is the largest customer in the government space of both McKesson and LabCorp, and we analyze our spend by looking at price per patient day and on/off-formulary reporting.** In addition to our strong national contracts, we also leverage group purchasing organization (GPO) relationships specifically for branded medical supplies to ensure competitive pricing.

## 5.25 The Wellpath Healthcare Cloud – Telehealth and Digital Healthcare Solutions

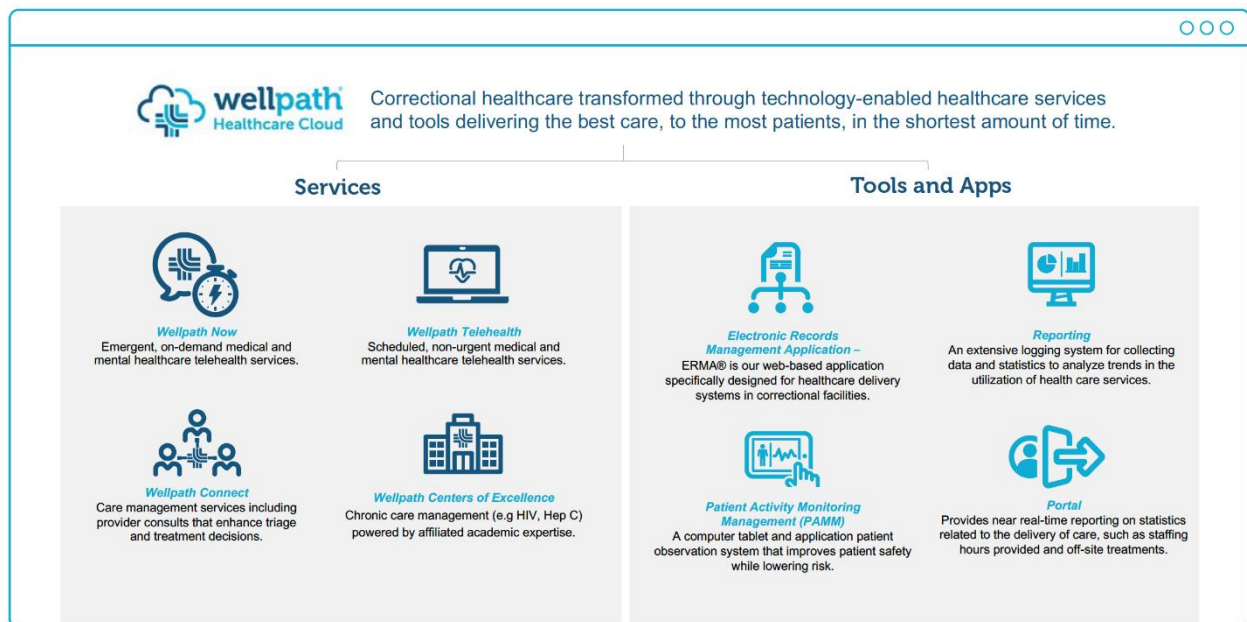
Wellpath has been delivering reliable, cost-effective, high-quality telehealth services in correctional facilities for many years, meeting community standards of care by using the best people, technology, and practices available. In 2020, we revolutionized correctional healthcare with the launch of the **Wellpath Healthcare Cloud**, a suite of technology-enabled, remote healthcare services and tools designed to enable the delivery of the best care, to the most patients, in the shortest amount of time.





The Wellpath Healthcare Cloud, leveraging the use of telehealth and digital health applications, is a **suite of cloud-based clinical delivery models** that is driving quality and care efficiency improvements across the country through an innovative redesign of correctional healthcare. Our proprietary, technologically enabled remote healthcare ecosystem is specifically designed to **optimize on-site care by providing patients specialized clinical expertise as quickly and efficiently as possible.**

The Wellpath Healthcare Cloud combines videoconferencing with dynamic workflows to deliver real-time emergent care, scheduled care, care management, eConsults, and specialty chronic care through a secure platform. With a simple click of a button, on-site staff have access to expert resources for treatment planning, decision-making, referrals, and long-term care.



## Wellpath Healthcare Cloud Services

The Wellpath Healthcare Cloud includes these key services:



### ***Wellpath Now – Emergent and Urgent, On-Demand Telehealth Services for Patients and Providers***

Wellpath Now brings on-demand clinical expertise directly to the on-site caregiver and patient at the touch of a button. Wellpath Now is staffed by primary care physicians and advanced practice providers (APPs) as well as specialty consultations by emergency medicine-trained providers for non-life-threatening consults regarding need for emergency evaluation. These acute care consultations for patients in need of emergency evaluation are provided **in an average of just six minutes**. With immediate video-enabled access to seasoned providers, on-site nurses, custody staff, and providers can reduce their reliance on the hospital emergency department and provide better care on site. **Our client partners have experienced a significant reduction in emergency room transfers by using Wellpath Now, and we expect to see this pattern continue in Humboldt County.**



### ***Wellpath Telehealth – Scheduled, Non-Emergent Telehealth for Patients and Providers***

Our proprietary correctional telehealth platform is easy to use and supercharged with Wellpath clinical expertise. This tool automatically identifies and schedules a licensed Wellpath network specialist, including automating access to information contained in the patient medical record. It coordinates scheduled patient visits with a broad variety of primary care and specialty providers, including psychiatry, mental health, and APPs to remote rural sites or for after-hour on-call services. Wellpath Telehealth is a force multiplier that provides a drastic increase in healthcare options, experience, and efficiencies to patients, partners, and providers. In 2020, Wellpath conducted more than 165,000 telehealth encounters, providing high-quality remote care to more than 250 facilities across 32 states. Our multi-specialty telehealth solution can deliver the following care through an established infrastructure of licensed providers:

- Wound care
- Infectious disease
- Dermatology
- Internal medicine
- Family practice
- Psychiatry
- Rheumatology
- Oncology
- Emergency services
- Cardiology
- Endocrinology
- Pulmonology
- Orthopedics
- Nephrology
- Urology
- Gastroenterology



### ***Wellpath Centers of Excellence – Long-Term, Chronic Patient Care and Management***

Wellpath Centers of Excellence (COEs) provide best practice chronic care management (e.g., HIV, Hepatitis C) powered by academic medicine-affiliated expertise. Wellpath COEs leverage telehealth to optimize best practice clinical outcomes, implement evidence-based protocols, increase access to subspecialty care, and achieve the highest community standards of care for chronic conditions. Wellpath chronic care COEs deliver best practice clinical management for chronic conditions through telehealth visits, addressing quality, access, the patient experience, and total cost of care.

Wellpath's HIV COE, for example, incorporates best practice care delivery and best pricing for specialty pharmaceuticals in collaboration with provider specialists from our academic medical center partner. Therapeutic optimization addresses quality and total cost of care by choosing the correct drug regimens to suppress viral load and improve medication adherence. Specifically, we are able to use both generic and higher-cost specialty drugs to maximize outcomes, with HIV care being performed by infectious disease experts who specialize in corrections.

Outcome measures include suppression of circulating virus, preserving immunologic function, reduction in morbidity and mortality, and prevention of transmission. These outcome measures are made possible by procedures to optimize screening, laboratory testing, continuity of care, and therapeutic optimization. **Wellpath's HIV COE program has achieved viral suppression rates 30% higher than the national average.**

In the future Wellpath plans to have these COE and disease pathways certified by the National Commission on Quality Assurance (NCQA) Health Plan Accreditation, a widely recognized, evidence-based program dedicated to quality improvement and measurement.



### **Wellpath Connect – Care Management & Off-site Consults for On-site Providers & Staff**

Wellpath Connect offers centralized care management and off-site management services that enhance healthcare triage and treatment decisions. Wellpath Connect gives on-site providers timely access to specialty care through enhanced remote care coordination, while additionally supporting on-site providers with expert clinical consultations via eConsults. **At sites using Wellpath Connect, the percentage of potential off-site specialty referrals able to be managed on site more than doubled, resulting in the near elimination of unnecessary off-site specialty consults and reduced use of agency transport staff.** Simultaneously, our centralized Wellpath Connect care management service is maintaining, or exceeding, quality metrics compared to the traditional model.

#### *Focus on Wellpath eConsults*

A key element of Wellpath Connect is **eConsult**, which gives our on-site providers access to a panel of medical specialists from around the country for additional consultation on a patient’s need for off-site referral. Wellpath Regional Medical Directors and Wellpath Regional Connect Providers process requests from the site providers. The consulting specialist either affirms the need for off-site referral or recommends on-site management of the patient’s condition, including continuing involvement of the specialist. The Wellpath provider then decides whether or not to send the patient off site. This reduces unnecessary off-site referrals while ensuring optimal clinical care. The result is **better and safer care by bringing the expertise of medical specialists to the patient without ever leaving the facility.**



Healthcare staff document all eConsults in the patient’s health record. The eConsult system is integrated with our Care Management system, so providers can submit the consultation referral and view the specialist’s response in one place. The system also includes robust analytics and dashboards that allow our clinical team to analyze referral data and identify opportunities to optimize the delivery of on-site care and further reduce unnecessary off-site trips. **We have seen a significant reduction in off-site trips where we use the eConsult system.**

The eConsult system provides access to **140 medical and mental health specialists in approximately 70 specialties**, many of whom are affiliated with academic and major health systems. All specialists are licensed, board certified, and fully insured practicing physicians with training and experience in telehealth, technology, and corrections. They must undergo rigorous background checks and participate in ongoing quality monitoring.

Specialties available through eConsult include (but are not limited to):

- Addiction Medication
- Allergy & Immunology
- Cardiology
- Dermatology
- Endocrinology
- ENT
- Gastroenterology
- General Surgery
- Hepatology
- Hematology
- Infectious Disease
- Internal Medicine
- Nephrology
- Neurology
- OB/GYN
- Oncology
- Ophthalmology
- Orthopedic Surgery
- Palliative Medicine & Hospice
- Pulmonology
- Psychiatry
- Rheumatology
- Sleep Medicine
- Urology

### Benefits of Healthcare Cloud Services

The **Wellpath Healthcare Cloud** is a comprehensive solution that empowers a more effective on-site healthcare program. We developed the Wellpath Healthcare Cloud to deliver health-related services and information that enhance the quality and efficiency of patient care, administrative activities, and health education. This suite of cloud-based services strengthens the traditional delivery model where gaps (e.g., provider recruitment challenges) and vulnerabilities (e.g., after-hours coverage) in care delivery open up risk to delayed care, preventable off-site transfers, and avoidable off-site expenditures. The Wellpath Healthcare Cloud **reduces total cost of care** (considering medical services, transportations costs, and public safety costs), while delivering high-quality clinical care that meets or exceeds community standards.



The Wellpath Healthcare Cloud provides key benefits that improve clinical quality, patient and staff safety, time to expert emergent and specialty care, decision-making for off-site visits, care standardization, adherence to clinical best practices, and risk reduction.

Features and Benefits of Wellpath Healthcare Cloud	
Feature	Benefit
<b>Mitigate patient movement</b>	<ul style="list-style-type: none"> <li>Eliminates the need for off-site transport to emergency departments and specialist visits</li> <li>Reduces associated travel risks &amp; costs</li> </ul>
<b>Access to Wellpath providers across the clinical enterprise</b>	<ul style="list-style-type: none"> <li>Increases access to care</li> <li>Reduces staffing vacancy and absence related costs</li> <li>Shortens service delivery times</li> <li>Reduces time to fill telehealth positions</li> <li>Reduces employee burnout</li> </ul>
<b>Available during non-standard hours</b>	<ul style="list-style-type: none"> <li>Shortens service delivery times</li> <li>Increases timeliness of access to care during urgent situations</li> </ul>
<b>Connects to national experts to enhance best practice of care for complex cases</b>	<ul style="list-style-type: none"> <li>Provides timely, impactful specialist coverage</li> <li>Promotes synchronized staff education on current clinical issues</li> </ul>
<b>Supports prompt and accurate diagnoses</b>	<ul style="list-style-type: none"> <li>Maintains equivalent diagnostic and therapeutic outcomes compared to in-person consultations</li> </ul>

## 6 Cost Proposal

**REQUEST FOR PROPOSALS #DHHS2021-06  
PROVISION OF MEDICAL SERVICES AT HUMBOLDT COUNTY CORRECTIONAL AND  
DETENTION FACILITIES**

**ATTACHMENT B – COST PROPOSAL FORM**

Itemize all costs that will be incurred by the County for the provision of Services set forth in RFP #DHHS2021-06 Price Quotes shall include any and all costs associated with the provision of such services. A narrative should be attached to clarify any pricing data submitted.

<b>A. Personnel Costs</b>	
Title: RN HSA Salary: \$73.50/hr. plus benefits – based on title and role, on-call, overtime, and backfill may apply Duties Description: Oversees the Medical program at the Humboldt County Facilities	\$178,442
Title: Mid-Level Provider – NP/PA Salary: \$83.25/hr. - based on title and role, on-call, overtime, and backfill may apply Duties Description: Licensed practitioner responsible for managing health issues and coordinating health care	\$199,625
Title: RN DON Salary: \$60.00/hr. - based on title and role, on-call, overtime, and backfill may apply Duties Description: Responsible for managing nursing unit	\$148,314
Title: Clerk Salary: \$25.00/hr. - based on title and role, on-call, overtime, and backfill may apply Duties Description: Responsible for managing patient health records and history	\$78,599
Title: MD – Physician Salary: \$172.50/hr. - based on title and role, on-call, overtime, and backfill may apply Duties Description: Diagnose and treat patients/manage health maintenance	\$106,927
Title: Dentist Salary: \$160.00/hr. - based on title and role, on-call, overtime, and backfill may apply Duties Description: Diagnose and treat dental issues	\$75,693
Title: Dental Assistant Salary: \$26.75/hr. - based on title and role, on-call, overtime, and backfill may apply Duties Description: Assist dentist with patients, instruments, and supplies	\$16,677
Title: RN Salary: Average of \$55.00/hr. plus benefits for 9.40 FTE - based on title and role, on-call, overtime, and backfill may apply Duties Description: Assess patient health issues, administering nursing care	\$1,567,615
Title: LVN Salary: Average of \$35.00/hr. plus benefits for 6.53 FTE - based on title and role, on-call, overtime, and backfill may apply Duties Description:	\$750,223
<b>Total Personnel Costs:</b>	<b>\$3,122,115</b>
<b>B. Operational Costs</b>	
Title: Facility Expenses Description: Operational costs pertaining to the Facilities – equipment, wireless allowance, contract services, and IT expenses	\$22,227
Title: Site Operation Expenses Description: Communication, program supplies, and training	\$8,728
Title: Administrative Expenses Description: Office supplies, printing/forms, dues, licenses, and taxes	\$21,004
Title: SG&A Description: Corporate costs and expenses	\$323,937

Title: Contract Labor Description: Use of independent contractors who are not CFMG employees for medical and nursing	\$63,297
Title: Profit Description: Amount CFMG/Wellpath will earn versus expenses	\$326,119
<b>Total Operational Costs:</b>	<b>\$765,311</b>
<b>C. Consumables/Supplies</b>	
Title: Medical Supplies Description: Supplies needed for medical care	\$32,169
Title: Dental Supplies Description: Supplies needed for dental care	\$2,148
Title: Lab Services Description: Labs performed on-site	\$57,966
Title: X-ray/Imaging Services Description: Diagnostic imaging performed on-site	\$6,121
Title: Bio-Hazard Services Description: Medical waste removal	\$3,900
<b>Total Consumables/Supplies Costs:</b>	<b>\$102,303</b>
<b>D. Transportation/Travel</b>	
Title: Travel Description: Travel associated with the medical program at Humboldt County	\$16,187
<b>Total Transportation/Travel Costs:</b>	<b>\$16,187</b>
<b>E. Other Costs</b>	
Title: Off-site Medical Care Description: Medical care performed off-site	\$538,516
Title: Pharmacy Description: pharmaceuticals and pharmacy equipment	\$156,392
Title: Insurance Description: Liability and malpractice coverage	\$203,176
Title: COVID Supplemental Bonus/Income Description: Bonus structure to be reviewed each year for attracting and retaining nurses during the pandemic	\$79,650
<b>Total Other Costs:</b>	<b>\$977,734</b>
<b>Total:</b>	<b>\$4,983,650</b>

**Personnel:** include all employee costs, but not independent contractors. List each employee type separately.

**Operational:** include all direct and indirect expenses for the project, except consumable supplies and travel. Include such things as rent, office supplies, postage, paper, communications, equipment, contract labor or services, and overhead or administrative costs. Please list each type of cost separately.

**Consumables:** includes items that will be used-up/consumed by participants or staff - food, meal, or meeting supplies, etc.

**Transportation:** vehicle purchase or rental costs, employee per-mile reimbursements, and other travel-related expenses.

**Other Costs:** includes anything not already covered in the budget categories above. List each expense separately. Overhead and administrative costs may not exceed 10% of the total modified total costs, per OMB Federal Guidance.

## ***Cost Proposal Narrative***

The Wellpath cost proposal covers all required labor, equipment, and materials necessary to provide the healthcare delivery system described in RFP #DHHS2021-06 for Provision of Medical Services. All program services meet or exceed the requirements and specifications detailed in the RFP and clarified by the answers to questions.

Wellpath is enthusiastic about the opportunity to continue our partnership with Humboldt County to provide medical care services for our patients in the Sheriff's custody. We have worked diligently to deliver a meaningful proposal that illustrates the best value for the stakeholders of Humboldt County, and demonstrates our commitment to transparency and accountability. We believe our proposal provides programs and solutions to best meet your specific needs and meeting National Commission on Correctional Health Care (NCCHC) accreditation. We look forward to discussing our plan in further detail.

Our experience, resources, culture, and philosophy of care make us different from our competitors and also make Wellpath the right partner for Humboldt County. We know cost is important; we also understand the mission you have for quality, compassionate care. As your partner in that mission, we commit continuity in these areas:

- ✓ Focus on the ever-changing needs of our patient population by expanding on-site services, with particular on medication assisted treatment programming,
- ✓ Recruiting, training, and retaining the right staff members for each position and filling shifts as contracted.
- ✓ Delivery of timely and transparent reporting designed to demonstrate accountability at every level.
- ✓ True partnership with Humboldt County to expertly drive your healthcare program in the right direction.
- ✓ Representing the HCSO in the community as your partner to support socially conscious projects.
- ✓ Provision of care with a passion and a mission of setting patients on the path **to hope and healing**.

We know you want the best possible program, and cutting corners is not an option. Wellpath is the right partner to take your program to the next level.

***Staffing and Services Overview*** - The Wellpath Cost Proposal covers all professional services; staffing, including salaries and employee benefits; on-site services including laboratory, radiology, and dental; off-site services; electronic health records management; National Commission on Correctional Health Care (NCCHC) accreditation management; medical equipment; pharmaceuticals; Wellpath Regional Management support; and insurance, licenses, applicable taxes, and legal costs, as illustrated in the chart on the following page:

Staffing and Services Overview for Humboldt County	
<b>Professional Staffing (Hours per Week)</b>	<b>FTE</b>
<b>Total Full-Time Equivalent Employees (FTEs) – All Facilities</b>	<b>20.53 FTEs</b>
<b>Technology</b>	<b>Included</b>
Wellpath Healthcare Cloud	✓
CorEMR Electronic Medical Record + 24/7 IT Support / LabCorp Interface	✓
<b>Professional On-site Services and Supplies</b>	<b>Included</b>
Medical and Dental Services	✓
On-Call 24/7	✓
Emergency Transportation	✓
Policies and Procedures	✓
Laboratory Services	✓
X-ray Services	✓
Disposable Medical Supplies	✓
Medical Waste Disposal	✓
Basic Medical Training - Jail Staff	✓
Comprehensive Medical Malpractice Insurance	✓
Corporate Management and Oversight	✓
Accreditation Management	✓
<b>Professional Off-site Services</b>	<b>Included</b>
Care Management (Utilization)	✓
Off-site Management	✓ (1)
<b>Pharmacy Services</b>	<b>Included</b>
Complete Pharmaceutical Management	✓ (2)
<b>Capitation</b>	
(1) Medical/Surgical Inpatient per occurrence	\$15,000
(2) AIDS/HIV per year	\$10,000

**Pharmacy** - As in our current contract, Wellpath will provide a comprehensive pharmaceutical program, excluding HIV/AIDS pharmaceutical costs in excess of an aggregate cap of \$10,000 per year. Additionally, Wellpath will not be responsible for psychotropic medication costs.

**Off-Site Costs** - As in our current contract, Wellpath will not be responsible for any individual inmate’s medical/surgical inpatient costs in excess of \$15,000 per occurrence. We have excluded inpatient event costs from our pricing as a cost savings and with the expectation that the Medi-Cal County Inmate Program (MCIP) will cover a large portion of the inpatient event costs for the County. Wellpath will continue to coordinate with the County to facilitate MCIP eligibility of inmates and Medi-Cal payment for Medi-Cal covered services.

**Annual Increases** - Following completion of Year One of the contract term, CFMG/Wellpath proposes an increase consistent with the Consumer Pricing Index – All Urban Consumers, Medical Care, for the West Urban Region or 3% whichever is higher. This is to ensure that we can continue to offer wages that are competitive in the Humboldt County market in subsequent years.



**Jail Based Competency (JBCT) Program** - We carved out Jail Based Competency Treatment (JBCT) Program costs from our pricing because it is not required by the RFP #DHHS2021-06 for Provision of Medical Services and the current JBCT contract does not expire until June 30, 2022. We look forward to discussing the JBCT program with the County.

**Bidding ADP/Per Diem** - In addition to the Base Amount, a Per Diem charge of \$5.77 per inmate per day will be imposed when the combined average daily inmate population (ADIP) at HCCF exceeds 425 inmates.

**Change in Scope of Work** - The Wellpath proposed pricing reflects the scope of care as outlined in our Proposal, the RFP requirements, and the current community standards of care regarding correctional healthcare services. Should there be any change in or modification of the local, national or community standards of care or scope of services, court rulings or interpretation, state or federal law or statute, or interpretation thereof, that results in sustained and material changes in costs, coverage of costs related to such changes are not included in this proposal and would need to be immediately negotiated with the Humboldt County Sheriff’s Department to ensure all parties’ interests are properly aligned. Changes such as the opening of additional areas in either of the facilities or construction of additional space would all be considered a change in the scope of service and potentially require immediate renegotiation.

**Optional Medication Assisted Treatment (MAT) Program** - As required by the RFP #DHHS2021-06 for Provision of Medical Services, Wellpath is offering an optional Medication Assisted Treatment (MAT) Program for the provision of MAT services in collaboration with DHHS – Behavioral Health. If the County chooses the optional MAT program, Wellpath will provide and continue MAT, including education and discharge planning services to patients with an Opioid Use Disorder housed at the Humboldt County Correctional Facility. Additionally, we will collect, monitor, and report program data to the County. Our Year One cost below includes program staffing, medications, labs, and drug screens.

MAT Program	Annual	Monthly
Year 1	\$249,837	\$20,819

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## 7 Supplemental Documentation

Wellpath has reviewed and acknowledges all the requirements set forth in this RFP and the sample Professional Services Agreement. Any administrative policies, procedures, and best practices that are used to facilitate the provision of services set forth in this RFP have been outlined comprehensively throughout [Section 5 – Program Description](#). All required licensure and certification documents have been provided in [Section 9 – Evidence of Insurability and Business Licensure](#).

A list of supplemental documentation has been provided below.

- Current Clients – [Attachment A](#)
- Former Clients – [Attachment B](#)
- Litigation History – [Attachment C](#)
- Policies and Procedures Table of Contents – [Attachment D](#)

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## 8 References

**REQUEST FOR PROPOSALS #DHHS2021-06  
PROVISION OF MEDICAL SERVICES AT HUMBOLDT COUNTY CORRECTIONAL AND  
DETENTION FACILITIES**

**ATTACHMENT C – REFERENCE DATA SHEET**

REFERENCE DATA SHEET		
Provide a minimum of two (2) references with name, address, contact person and telephone number whose scope of business or services is similar to those of Humboldt County (preferably in California). Previous business with the Humboldt County does not qualify.		
<b>NAME OF AGENCY:</b>	San Luis Obispo County	
<b>STREET ADDRESS:</b>	1585 Kansas Ave.	
<b>CITY, STATE, ZIP:</b>	San Luis Obispo, CA 93405	
<b>CONTACT PERSON:</b>	Dr. Christy Mulkenin, Chief Medical Officer	<b>EMAIL:</b> cmulkenin@co.slo.ca.us
<b>PHONE #:</b>	805-781-4510	<b>FAX #:</b> N/A
<b>Department Name:</b>	San Luis Obispo County Jail	
<b>Approximate County (Agency) Population:</b>	525	
<b>Number of Departments:</b>	1	
<b>General Description of Scope of Work:</b>	Medical, Dental, Mental Health, JBCT Services	
<hr/>		
<b>NAME OF AGENCY:</b>	Santa Barbara County	
<b>STREET ADDRESS:</b>	4436 Calle Real	
<b>CITY, STATE, ZIP:</b>	Santa Barbara, CA 93110	
<b>CONTACT PERSON:</b>	Sheriff Bill Brown	<b>EMAIL:</b> wfb4029@sbsheriff.org
<b>PHONE #:</b>	805-681-4290	<b>FAX #:</b> 805-681-4310
<b>Department Name:</b>	Santa Barbara County Jail, Santa Barbara Juvenile Hall	
<b>Approximate County (Agency) Population:</b>	1052 Adults, 66 youth	
<b>Number of Departments:</b>	3	
<b>General Description of Scope of Work:</b>	Medical, Dental, Mental Health (Adult only), JBCT Services	

<b>Applicant Tracking System Implementation Date:</b>	N/A	
<b>NAME OF AGENCY:</b>	Monterey County	
<b>STREET ADDRESS:</b>	1414 Natividad Rd.	
<b>CITY, STATE, ZIP:</b>	Salinas, CA 93906	
<b>CONTACT PERSON:</b>	Sheriff Steve Bernal	<b>EMAIL:</b> bernalst@co.monterey.ca.us
<b>PHONE #:</b>	831-755-3750	<b>FAX #:</b> 831-759-7234
<b>Department Name:</b>	Monterey County Jail	
<b>Approximate County (Agency) Population:</b>	947	
<b>Number of Departments:</b>	1	
<b>General Description of Scope of Work:</b>	Medical, Dental, Mental Health, JBCT Services	



**COUNTY OF SAN LUIS OBISPO**  
**SHERIFF'S OFFICE**  
*Ian Parkinson Sheriff-Coroner*

October 21, 2020

Wellpath  
Kip Hallman, President

Dear Mr. Hallman,

I hope this letter finds you well. As you know, in February 2019, San Luis Obispo County Sheriff's Office switched from a County-run Jail healthcare system to contracting Jail healthcare services to Wellpath. Our contract is overseen by a Chief Medical Officer. We are currently 20 months into our contract, and I am happy to report that the partnership is strong.

Wellpath staff have proven to be professional, responsive, and caring about the health and welfare of the inmates in our facility. The care that the staff deliver is consistent and backed by strong protocols that follow the national standard for correctional health care. Inmates are among the most vulnerable members of our community, and Wellpath has met the challenge of caring for this high-needs patient population.

We have been grateful to have Wellpath as a partner in three of the great challenges facing correctional health care today: the current mental health crisis, increasing incidence of substance use disorders, and the COVID-19 pandemic. Largely in part to Wellpath's attention to our patients with mental health needs, our County has been named a Stepping Up Innovator County. Our Medication-Assisted Treatment program is growing under Wellpath leadership, rising to meet the high needs of patients with substance use issues.

The COVID-19 pandemic has been a challenge for many, but correctional health care settings are particularly vulnerable. The close living quarters allow for rapid spread of disease, and the high rate of underlying medical conditions make this patient population prone to problems from COVID-19. We have found Wellpath to be proactive in procuring PPE, implementing screening protocols for new arrestees early in the pandemic, supporting quarantine and isolation procedures, providing regular updates to custody partners, and adding staff when necessary to support outbreaks. Our facility's forward-thinking approach has allowed us to keep infections to a minimum.

Thank you for your dedication to providing quality medical, mental health, substance use, and dental care to the people in our facility. We look forward to continuing this partnership for years to come.



Ian S. Parkinson  
Sheriff-Coroner



**STATIONS**

**Buellton**  
140 W. Highway 246  
Buellton, CA 93427  
Phone (805) 686-8150

**Carpinteria**  
5775 Carpinteria Avenue  
Carpinteria, CA 93013  
Phone (805) 755-4452

**Isla Vista**  
6504 Trigo Road  
Isla Vista, CA 93117  
Phone (805) 681-4179

**Lompoc**  
3500 Harris Grade Road  
Lompoc, CA 93436  
Phone (805) 737-7737

**New Cuyama**  
70 Newsome Street  
New Cuyama, CA 93254  
Phone (661) 766-2310

**Santa Maria**  
812-A W. Foster Road  
Santa Maria, CA 93455  
Phone (805) 934-6150

**Solvang**  
1745 Mission Drive  
Solvang, CA 93463  
Phone (805) 686-5000

**Sheriff - Coroner Office**  
66 S. San Antonio Road  
Santa Barbara, CA 93110  
Phone (805) 681-4145

**Main Jail**  
4436 Calle Real  
Santa Barbara, CA 93110  
Phone (805) 681-4260

**COURT SERVICES  
CIVIL OFFICES**

**Santa Barbara**  
1105 Santa Barbara Street  
P.O. Box 690  
Santa Barbara, CA 93102  
Phone (805) 568-2900

**Santa Maria**  
312 E. Cook Street, "O"  
P.O. Box 5049  
Santa Maria, CA 93456  
Phone (805) 346-7430

**HEADQUARTERS**  
P.O. Box 6427 • 4434 Calle Real • Santa Barbara, California 93160  
Phone (805) 681-4100 • Fax (805) 681-4322  
www.sbsheriff.org  
October 7, 2020

**BILL BROWN**  
Sheriff - Coroner  
**SOL LINVER**  
Undersheriff

Kip Hallman  
President  
Wellpath  
3911 Sorrento Blvd., Suite 130  
San Diego, CA 92121

Dear Kip,

On behalf of the men and women of the Santa Barbara Sheriff's Office I want to thank you and every member of your team for continuing the fine job you have done since becoming the contract medical and mental health services provider in our jail.

Your staff and your organization have really shined during the COVID-19 pandemic. Although we, like most corrections agencies, have experienced outbreaks of the virus in our Jail, thanks to the partnership of your employees with our staff we have been able to limit these and contain them quickly. We have had to conduct surveillance testing on hundreds of inmates and staff members, and your people have given their all to help make that testing happen in timely ways.

Providing healthcare services in a custody environment is difficult under any circumstances, but you have delivered to us exactly what you promised you would – quality health care provided in a well-coordinated and caring manner. Our respective staff have established excellent working relationships and now work together very smoothly as a team.

Lastly, I want to thank you for the personal relationship that you and I have developed. Your accessibility and responsiveness as the CEO of the organization is second to none, and I appreciate your professionalism, can-do attitude, and responsiveness in all that we have done together. I look forward to many more years of a successful partnership.

Thank you and your people once again for a job especially well done.

Sincerely,



**BILL BROWN**  
Sheriff – Coroner





MONTEREY COUNTY, CALIFORNIA  
**SHERIFF'S OFFICE**  
Keeping the peace since 1850

**STEVE BERNAL**  
Sheriff-Coroner

October 1, 2020

To Whom it may Concern,

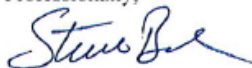
I am in my second term as the Sheriff of Monterey (CA) County. During my tenure, I have worked closely with CFMG and Wellpath Executives to provide quality medical, mental health, and dental services to our inmate population in the Monterey County Jail. I have found Wellpath and their staff to be extremely professional, caring, and knowledgeable in the performance of their duties as well as being responsive to my staff and I when we require information.

I have observed that Wellpath hires local medical practitioners to work in our County Jail. I find this tends to help with their employee's commitment to our County Jail inmates and staff as well as the community at large. These local commitments help provide necessary continuity of care for our inmate clients as they transition into or out of our County Jail. In addition, these local connections allow us to build relationships with community-based medical service providers to enhance the medical services we can deliver to our inmate clients.

Since the merger of CFMG and CCS, I have seen a commitment to bringing the best of both companies to their clients. Wellpath is now the leader in best practices and policies when it comes to jail medical providers.

Monterey County and the Monterey County Sheriff's Office have contracted with CFMG and now Wellpath for over 30 years. We have benefitted tremendously from our long-standing relationship over the years. Wellpath is a valued and trusted partner, as evidenced by the recent four-year extension to our contract. I strongly encourage you to consider Wellpath as your correctional medical services provider.

Professionally,



Steve Bernal  
Sheriff-Coroner  
Monterey County

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## 9 Evidence of Insurability and Business Licensure

Wellpath has provided a certificate of Liability Insurance and California State business licensure on the following pages.



**CERTIFICATE OF LIABILITY INSURANCE**

DATE (MM/DD/YYYY)  
11/16/2021

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

**IMPORTANT:** If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

<b>PRODUCER</b> Chicago, IL-Hub International Midwest West 55 East Jackson Boulevard Suite 14th Floor Chicago IL 60604  License# 100290819 WELLPA0001	<b>CONTACT NAME:</b> PHONE (A/C No. Ext): 312-922-5000      FAX (A/C, No): 312-922-5358 E-MAIL ADDRESS: csuchicago@hubinternational.com	
	<b>INSURER(S) AFFORDING COVERAGE</b>	<b>NAIC #</b>
<b>INSURED</b> Wellpath Holdings, Inc. 1283 Murfreesboro Road Suite 500 Nashville TN 37217	<b>INSURER A:</b> Zurich American Insurance Company	16535
	<b>INSURER B:</b> American Zurich Insurance Company	40142
	<b>INSURER C:</b> Texas Insurance Company	16543
	<b>INSURER D:</b>	
	<b>INSURER E:</b>	
	<b>INSURER F:</b>	

**COVERAGES**      **CERTIFICATE NUMBER:** 1714357075      **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INBR LTR	TYPE OF INSURANCE	ADDITIONAL INSURED	SUBROGATION	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
C	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR  GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC <input type="checkbox"/> OTHER:			BUQSTRITN013100-050001-01	3/15/2021	3/15/2022	EACH OCCURRENCE \$ 3,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 100,000 MED EXP (Any one person) \$ 5,000 PERSONAL & ADV INJURY \$ 3,000,000 GENERAL AGGREGATE \$ 6,000,000 PRODUCTS - COMP/OP AGG \$ Included \$
A	<b>AUTOMOBILE LIABILITY</b> <input checked="" type="checkbox"/> ANY AUTO <input type="checkbox"/> OWNED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS ONLY <input checked="" type="checkbox"/> NON-OWNED AUTOS ONLY			BAP 5252136-07	10/1/2021	10/1/2022	COMBINED SINGLE LIMIT (Ea accident) \$ 2,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
	<b>UMBRELLA LIAB</b> <input type="checkbox"/> OCCUR <b>EXCESS LIAB</b> <input type="checkbox"/> CLAIMS-MADE DED    RETENTION \$						EACH OCCURRENCE \$ AGGREGATE \$ \$
B	<b>WORKERS COMPENSATION AND EMPLOYERS' LIABILITY</b> ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N	N/A	WC5252134-07 (AOS) WC5252135-07 (WI)	10/1/2021 10/1/2021	10/1/2022 10/1/2022	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTHER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000
C	<b>MEDICAL PROF LIABILITY (CLAIMS MADE)</b>			BUQSTRITN013100-050001-01	3/15/2021	3/15/2022	PER LOSS EVENT: \$3,000,000 AGGREGATE: \$6,000,000

**DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES** (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)  
 County of Humboldt, its agents, officers, officials, employees and volunteers is/are included as additional insured (except workers compensation) where required by written contract. Waiver of subrogation is applicable where required by written contract and subject to policy terms and conditions. This insurance is primary and non-contributory over any existing insurance and limited to liability arising out of the operations of the named insured subject to policy terms and conditions. DEDUCTIBLES - Workers' Compensation \$500,000, Automobile Liability \$250,000, General Liability \$3,000,000, Professional Liability \$3,000,000

<b>CERTIFICATE HOLDER</b>  County of Humboldt Attn: Risk Management 825 5th Street, Room 131 Eureka CA 95501-0000	<b>CANCELLATION</b>  SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.  AUTHORIZED REPRESENTATIVE 
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AGENCY CUSTOMER ID: \_\_\_\_\_  
LOC #: \_\_\_\_\_



**ADDITIONAL REMARKS SCHEDULE**

AGENCY HUB International Midwest Limited		
POLICY NUMBER		
CARRIER	NAIC CODE	
		EFFECTIVE DATE:

**ADDITIONAL REMARKS**

THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,  
FORM NUMBER: 25 FORM TITLE: CERTIFICATE OF LIABILITY INSURANCE

ADDITIONAL NAMED INSUREDS INCLUDE:

- CCS-CMGC Parent Holdings, LP
- CCS-CMGC Intermediate Holdings2, Inc.
- CCS-CMGC Intermediate Holdings, Inc.
- Wellpath Holdings, Inc.
- CCS-CMGC Holdings, Inc.
- Wellpath Group Holdings, LLC
- Correct Care Solutions Group Holdings, LLC
- Wellpath CFMG, Inc.
- CFMG Holdings Corp.
- Wellpath Management, Inc.
- Correctional Medical Group Companies, Inc.
- California Forensic Management Group, Inc.
- Southwest Correctional Medical Group, Inc.
- Wellpath, LLC
- Correct Care Solutions, LLC
- Health Cost Solutions, LLC
- Correct Care Holdings, LLC
- Wellpath Recovery Solutions, LLC
- Correct Care, LLC
- Correct Care of South Carolina, LLC
- Correct Care Australia Pty, Ltd (Australia)
- League Medical Concepts, LLC
- League Medical Concepts, LP
- Jessamine Healthcare, Inc.
- Conmed Healthcare Management, LLC
- Conmed, LLC
- Correctional Mental Health Services, LLC
- Correctional Healthcare Holding Company, LLC
- CHC Companies, LLC
- CHC Pharmacy Services, LLC
- Physicians Network Association, Inc.
- Correctional Healthcare Companies, LLC
- Healthcare Professionals, LLC
- Wellpath Recovery Solutions of Alaska, Inc.
- Northwest Correctional Medical Group, PLLC
- California Health and Recovery Solutions, PC (fka California CCS, PC)
- Massachusetts Correction Healthcare Services, PC
- Old Empire Dental, PC
- Great Peak Dental, PC
- Grand Prairie Health Services, PC
- CCS Kastre Nevada Medical, PC
- New York Correct Care Solutions Medical Services, PC
- Midwest Center, PC
- Old Empire Psychology, PC
- Great Peak Healthcare Services, PC
- New Garden Healthcare, PC
- Stringfellow Correctional Dental, PA
- California Forensic Medical Group, Inc.
- Colorado Correctional Medical Group, PLLC
- Southeast Correctional Medical Group, LLC
- Southwest Correctional Medical Group, PLLC
- Wellpath Hospital Holdings Company, LLC
- 901 45th Street West Palm Beach Florida Behavioral Health Hospital Company, LLC
- California Community Care Clinics, PC
- Wellpath Community Care Centers of Michigan, P.C.
- Wellpath Community Care Centers of North Carolina, P.C.
- Boynton Beach Florida Behavioral Health Hospital
- Wellpath Community Care Centers of Virginia, LLC
- Wellpath Community Care Centers of Indiana, P.C.

ACORD 101 (2008/01)

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**Certificate of Status – CFMG**



**Secretary of State  
Certificate of Status**

I, ALEX PADILLA, Secretary of State of the State of California, hereby certify:

**Entity Name:** CALIFORNIA FORENSIC MEDICAL GROUP, INCORPORATED  
**File Number:** C1230306  
**Registration Date:** 10/24/1983  
**Entity Type:** DOMESTIC STOCK CORPORATION  
**Jurisdiction:** CALIFORNIA  
**Status:** ACTIVE (GOOD STANDING)

As of January 3, 2021 (Certification Date), the entity is authorized to exercise all of its powers, rights and privileges in California.

This certificate relates to the status of the entity on the Secretary of State's records as of the Certification Date and does not reflect documents that are pending review or other events that may affect status.

No information is available from this office regarding the financial condition, status of licenses, if any, business activities or practices of the entity.



**IN WITNESS WHEREOF**, I execute this certificate and affix the Great Seal of the State of California this day of January 4, 2021.



**ALEX PADILLA  
Secretary of State**

**Certificate Verification Number:** Z182XBY

To verify the issuance of this Certificate, use the Certificate Verification Number above with the Secretary of State Certification Verification Search available at [bizfile.sos.ca.gov/certification/index](http://bizfile.sos.ca.gov/certification/index).

**Certificate of Status – Wellpath**



**Secretary of State  
Certificate of Status**

I, ALEX PADILLA, Secretary of State of the State of California, hereby certify:

**Entity Name:** WELLPATH LLC  
**California Name:** WELLPATH LLC  
**File Number:** 201903310040  
**Registration Date:** 01/28/2019  
**Entity Type:** FOREIGN LIMITED LIABILITY COMPANY  
**Jurisdiction:** DELAWARE  
**Status:** ACTIVE (GOOD STANDING)

As of January 3, 2021 (Certification Date), the entity is qualified to transact intrastate business in California.

This certificate relates to the status of the entity on the Secretary of State's records as of the Certification Date and does not reflect documents that are pending review or other events that may affect status.

No information is available from this office regarding the financial condition, status of licenses, if any, business activities or practices of the entity.



**IN WITNESS WHEREOF**, I execute this certificate and affix the Great Seal of the State of California this day of January 4, 2021.



**ALEX PADILLA  
Secretary of State**

**Certificate Verification Number:** Y6M1EGZ

To verify the issuance of this Certificate, use the Certificate Verification Number above with the Secretary of State Certification Verification Search available at [bizfile.sos.ca.gov/certification/index](http://bizfile.sos.ca.gov/certification/index).

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## 10 Exceptions, Objections, and Requested Changes

If re-awarded, CFMG looks forward to negotiating in good faith a mutually agreeable contract.

**INDEMNIFICATION** – CFMG respectfully takes exception to the indemnification language in RFP Section 16.4(K) and Section 16(A) of the Agreement and requests an opportunity to negotiate language that would recognize the parties’ intent that each party is responsible to the other for its actions/omissions, and that each party should bear cost approximately proportionate to its fault.

**OWNERSHIP OF DOCUMENTS** – CFMG respectfully takes exception to the language in RFP Section 16.4(Q) and Section 31 of the Agreement and requests an opportunity to negotiate document ownership regarding documents that include any CFMG confidential or proprietary information.

**CONFIDENTIALITY** – CFMG respectfully takes exception to County’s limited confidentiality obligations of CFMG’s confidential and/or proprietary information and CFMG wishes to negotiate language which will protect such information. (Section 11(A)).

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## 11 Required Attachments

Wellpath confirms the following required attachments have been completed and provided within this proposal:

- RFP Attachment A: [Section 3 – Signature Affidavit](#)
- RFP Attachment B: [Section 6 – Cost Proposal](#)
- RFP Attachment C: [Section 7 – Supplemental Documentation](#)
- RFP Attachment D: [Section 8 – References](#)