



# LASSEN COUNTY SHERIFF'S OFFICE

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**Dean F. Growdon**  
Sheriff - Coroner

To: Lassen County Board of Supervisors

From: John McGarva, Lieutenant

Re: Jail and Juvenile Hall Medical Services RFP

Agenda Date: March 19, 2019

## **Discussion:**

In December 2014, the Lassen County Board of Supervisors authorized the County Administrative Officer (CAO) to sign a contract with the California Forensics Medical Group. The contract was authorized for five years or three years with an option for two one year extensions.

Since January 15, 2015, CFMG has provided the medical services as outlined by the contract signed by the CAO. CFMG underwent a merger with Correct Care Solutions becoming known as Wellpath on November 1, 2018. This contract is set to expire on June 30, 2019. As a result, the Sheriff and his command staff began work on a Request for Proposals to provide medical services to the inmates of the Lassen County Jail and the Lassen County Juvenile Hall.

Prior to this medical services were provided on a limited basis as listed in the chart below:

Issue	Before Wellpath	Wellpath	Benefit
Hours of medical staff coverage per day, per week  Refer to chart below for detail view	Medical personnel on site 4-5 hours per day, 6 days per week primarily to host sick call	Medical personnel on site 16 hours per day, 7 days per week	Expanded coverage allows for medical personnel to handle intake, triage emerging issues, and deliver medication.
Intake Screening	There are no medical personnel on site to	Nursing staff on site 16 hours per day to	Nurses assisting with medical screening are able to refer bookings



	consult during the booking process	assist with medical screening of bookings	to appropriate medical care, refer to hospital, and make recommendations for housing location.
Daily Triageing	P.A.s / FNP triage medical requests prior to hosting daily sick call	On site nurses will help coordinate the daily triaging throughout the day. The medical director (M.D.) will oversee triage system.	Daily triaging happens throughout the day rather than just during sick call. A medical doctor will oversee the triage system.
Emergencies or urgent medical conditions	P.A.s on site (4-5 hrs per day) will triage. After hours calls go to an answering service. Officers wait for response to decide on treatment plan.	Nurses on site (16 hrs) will triage. After hours calls go to bona-fide “on-call” list for nurses, doctors, medical director	16 hours per day of medical personnel on site able to triage emerging conditions. Quick, reliable on call roster improved connectivity / consult with medical personnel.
Labs, tests, and Imaging	Inmates are referred to Banner Hospital for labs, tests, and imaging.	X-rays done on site. EKG done on site. Blood draws done in the jail and labs referred to outside lab.	Reduced transportation into the community for routine tests.
Pharmacy	Custody personnel deliver prescription medications to inmates	Nurses deliver prescription medications to inmates	Trained medical personnel handling and administering medications. Drastically reduces the risk of dangerous drug interactions or inadequate deliver of prescribed medication
Medical Records	Custody clerks are responsible to the maintenance of inmate medical files	Medical clerks are responsible for inmate medical files	Ensures medical records are stored / secured properly to maintain physician – patient confidentiality
Psychiatric	Lassen County Behavioral Health assists with crisis intervention, safety cell placements and	Will staff a Licensed Clinical Social Worker or a Psychiatric R.N at the jail 8-hours per week.	Much more predictable / reliable mental health services for county inmates. This allowed for better coordination





	suicide watches when summoned to the jail	That position will provide crisis intervention, consultation, and treatment. CFMG will also provide a Psychiatrist 2-4 hours per week via tele-medicine	between medical and mental health personnel for coordination of care and pharmaceuticals.
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The RFP was issued to vendors on January 24, 2019. A notice was sent to the local newspaper and posted on the Lassen County website. On January 31, 2019 at 1000 hours, a pre-proposal meeting and tour of facilities was held at the Lassen County Jail and Lassen County Juvenile Hall. Only one vendor was present, Wellpath. On February 27, 2019, we received a response from Wellpath. No other vendors submitted a proposal.

#### **Fiscal Impact:**

Wellpath's proposal has a combined cost of \$1,402,233 for the Jail and Juvenile Hall for the first year. Wellpath has estimated a 3% increase each year for the duration of the requested five year proposal. The proposed cost for each year are:

- Year 1: \$1,402,233
- Year 2: \$1,444,143
- Year 3: \$1,487,311
- Year 4: \$1,531,774
- Year 5: \$1,577,570

These numbers are only an estimate. Medical costs are constantly changing and extremely difficult to predict. Some of the factors in the Wellpath contract that will help control costs and improve the predictability of the correctional health (adult & juvenile) are:

- 16 hours per day of on-site medical personnel to help triage and control E.R. visits
- Wellpath is responsible for the 1<sup>st</sup> \$10,000 of each incident resulting in an E.R. visit or outpatient surgery.
- Wellpath is responsible for ground ambulance expenses.
- Wellpath is responsible for air ambulance expenses up to three trips in a calendar year.
- Wellpath is responsible for nearly all pharmaceutical medications.
- Wellpath is responsible for medical tests, labs, and X-rays.
- Wellpath is responsible for over the counter medications.

The following list includes factors that will produce costs above and beyond those covered in the Wellpath contract.

- The county is responsible for E.R. or other outpatient incidents that exceed \$10,000.



- The county is responsible for air ambulance services that exceed \$10,000.
- The county is responsible for air ambulance after three trips in a calendar year.
- The county is responsible for “specialty” pharmaceuticals including those used for AIDS, HIV, Hepatitis C, and blood disorders.

In addition to the above factors, there are two other issues that could have a positive impact on the budget related to inmate health care.

- Probable reimbursements through The Affordable Care Act for inmates that are hospitalized for a period exceeding 24 hours.
- Increased probability of contracting bed space once the county is offering an appropriate level of care for incarcerated persons.

The proposed staffing plan by Wellpath is attached to this document and submitted with the RFP.

### **Options:**

An evaluation committee comprised of representatives of the Sheriff’s Office, Probation Department and Office of the CAO was convened and make the following recommendations.

Option 1 – Award the RFP to Wellpath and authorize the CAO to begin formal negotiations for a multi-year contract.

Option 2 – Reject the proposal and offer guidance on the scope of new RFP for jail medical services.

Proposition 47 and AB109 have put longer-term inmates with more demanding health care needs into the Lassen County Jail. These inmates also come with a much higher expectation of correctional health based on experience with the state prison medical system. Jails throughout California are experiencing litigation based on medical conditions and care provided to them. Based on the outcomes of litigation in other counties, the Lassen County Jail cannot meet the increasing standards of medical care with any reduction in medical services. The Lassen County Jail cannot sustain medical services if we return to the level of services provided prior to contracting with a medical services provider.

### **Recommendation:**

Award the RFP to Wellpath and authorize the CAO to begin negotiations for a formal contract.



# Lassen County Sheriff's Office

Susanville, California

Jail and Juvenile Hall Medical Services

Technical and Cost Proposal

February 27, 2019

4:00 p.m. PST



**Respectfully Submitted to:**

John McGarva, Lieutenant  
Lassen County Sheriff's Office  
1415 Sheriff Cady Lane  
Susanville, CA 96130



**Submitted by:**

California Forensic Medical Group (CFMG)  
3911 Sorrento Valley Boulevard  
Suite 130  
San Diego, CA 92121

**Points of Contact:**

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Jack Jadin  
Director of Partnership Development  
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This submission includes the following required copies:  
Technical and Cost Proposal – 1 electronic proposal and 5 printed copies



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**Tabbed Attachments**

Current Contracts – **TRADE SECRET\*** ..... A  
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**\*TRADE SECRET ATTACHMENTS**

In accordance with the California Uniform Trade Secrets Act (Cal Civ. Code § 3426 et seq.) and the California Evidence Code (Cal. Evid. Code § 1060) concerning trade secret privilege protection and confidential commercial information protection, Wellpath respectfully requests that the attachments labeled TRADE SECRET be redacted from any distribution of this proposal pursuant to requests under the California Public Records Act, or for any other reason.



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## I. TRANSMITTAL LETTER

February 25, 2019

Dear Lt. McGarva and Evaluation Committee:

Wellpath, the newly combined Correctional Medical Group Companies and Correct Care Solutions, appreciates this opportunity to continue our partnership with the Lassen County Sheriff's Office by submitting this proposal to provide medical services at both the Lassen County Jail and the Lassen County Juvenile Hall.

In response to the need for a new correctional health care solution in the State of California, California Forensic Medical Group (CFMG), a physician-owned medical service corporation, was formed in 1983. This structure has allowed CFMG to maintain appropriate licensure and to continue in good standing with the California Secretary of State. CFMG engages Wellpath as its management service organization (MSO) to manage all administrative services and programs so Lassen County benefits from the experience of Wellpath in managing correctional services. CFMG will continue to be responsible for and solely provide all medical, clinical and patient care matters herein.

In October 2018, affiliates of CCS and Correctional Medical Group Companies, Inc. (CMGC) combined to create one family of premier public and correctional health care companies now known as Wellpath. Lassen County will have the benefit of the combined resources of these leading public health companies in the correctional industry. Through its collaborative MSO agreement with Wellpath, CFMG will continue to utilize the administrative capabilities of Wellpath and its home office in Nashville, Tennessee.

The name Wellpath is used throughout our proposal to identify the operational programming and administrative services for Lassen County. CFMG and Wellpath look forward to continuing our collaborative partnership with Lassen County. While our brand name has changed, our commitment to provide the finest health care available has not changed, and you can expect to work with familiar names and faces that have earned your trust over the years.

James Roemmich, Wellpath's Regional Director of Operations of Operations, recently attended your pre-proposal conference and tour. We appreciate your hospitality and the information you provided. After considering the information provided in the RFP, your responses to questions, and our experience providing services for the last four years in Lassen County, we are certain of our ability to continue providing the high-quality, cost-effective care you have come to expect from our people, programs, and technology.

We are pleased to take this opportunity to highlight the experience and qualifications we bring to you and your inmates every day. You are already aware of our dedication to continuous improvement and reliance on best practices. We strive to deliver the best care at the best price with full transparency. Simply put, our proposal demonstrates what you already know: our approach is one of collaboration, communication, cost-efficiency, and commitment to high-quality care – similar to the care available to everyone in the community.



Wellpath will never take you for granted. We appreciate our relationship and will continue to meet, or exceed, your expectations. That means delivering the right services at the right prices with the right sense of urgency and respect. We also appreciate our employees and work hard to retain valued members of our team. Our goal is always to be the provider that ***clients want to work with and employees want to work for!***

Our 35-year record of success and our 4-year history with Lassen County reflects our firm's ability to comply with the County's model contract and insurance requirements as described in Exhibit A.

Wellpath is passionate about the quality of care we deliver. We will never lose focus on the services we provide to Lassen County. We will work hard with you and your selected providers to ensure appropriate care to those confronting mental and behavioral health issues.

We encourage you to call us with any questions you may have regarding the information in this proposal and how we might serve you better. Thank you again for your business and partnership. We look forward to creating even more success for both parties in the future.

Sincerely,

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

Jack Jadin  
Director of Partnership Development  
920-304-6397  
JJadin@wellpath.us



## II. OVERVIEW

### II.1. Company Profile

Wellpath is the premier provider of localized, high-quality, compassionate care to vulnerable patients in challenging clinical environments. In October 2018, affiliates of Correct Care Solutions, LLC (CCS) and Correctional Medical Group Companies, Inc. (CMGC) combined to create one family of premier public and correctional health care companies now known as **Wellpath**. Lassen County will have the benefit of the combined resources of these leading public health companies in the correctional industry.

Wellpath is specifically organized to provide comprehensive correctional health care services to facilities similar to the Lassen County Jail and Juvenile Hall. Our programs in these facilities include the design and successful operation of comprehensive medical, dental, and mental health services for inmate populations. With each of our successful contracts and satisfied clients, we have demonstrated the necessary capabilities and resources that make us a qualified and willing partner for Lassen County. Given the opportunity to work with Lassen County, we will provide the same dedicated level of service that our clients have come to expect from us.

#### Wellpath at a Glance

- 35+ years in the industry
- Privately owned—We answer to our clients, not shareholders
- Nearly 15,000 Wellpath employees provide health care services for nearly 300,000 patients in 36 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 = \$1.6 billion
- Financially strong and stable
- Impeccable litigation record
- 100% success in our accreditation efforts

Today, nearly 15,000 Wellpath employees care for nearly 300,000 patients in 36 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 for our patients at each individual site.

#### *II.1.a. Date organized to provide health care services*

In October 2018, affiliates of Correct Care Solutions, LLC (CCS) and Correctional Medical Group Companies, Inc. (CMGC) combined to create one family of premier public and correctional health care companies now known as **Wellpath**. CCS began providing correctional health services in 2003. CMGC began providing correctional health care services in 1983.

#### *II.1.b. Corporate Experience*

Wellpath is proud to have served Lassen County for four years. During this time, we have executed a shared vision and commitment not only to the patients, but also to the community of Lassen County. We believe our relationship has been successful in improving patient care and operational efficiencies, as a result of our effective communication, support, accountability, and focus on finding mutually beneficial solutions to whatever challenges arise.

#### **Number of Years Doing Business**

Wellpath has more than 35 years of combined experience in the correctional health care industry.



The Wellpath Executive Team has hundreds of years of combined correctional health care experience, and the entire team will continue to be fully engaged in the operation of programs and services for the Lassen County Jail and Juvenile Hall. We also have several former Sheriffs and Jail Administrators, including Jack Jadin, in consulting roles who have nearly 175 years of combined law enforcement experience.

### Number of Years Providing Services in California

Wellpath has more experience providing correctional health care in California than any other provider in the industry. Across California, we provide comprehensive health care services to more than 20,000 inmates in 34 counties of every size, including 22 where we provide juvenile services and 25 where we provide mental health services.

Our average customer tenure is 17 years; we have served 12 counties for more than 20 years and 23 counties for more than 10 years.



Over the past 5 years, the following 14 California counties have selected or re-selected Wellpath through a competitive RFP process: **Alameda, Calaveras, Fresno, Lassen, Merced, Nevada, Santa Barbara, San Luis Obispo, Shasta, Sonoma Behavioral Health Services** (we have also provided Medical Services since 2001), **Sutter, Ventura, Yolo, and Yuba.**

In our contracts, Wellpath serves as the direct medical care provider and not as an extension of County staff, although we work collaboratively with County behavioral health departments in those instances in which we are not the mental health provider in the detention facilities.

We have unrivaled experience with accreditation processes across California and nationwide. Dr. Raymond Herr, Senior Regional Medical Director and President of CFMG, is an NCCHC Certified Correctional Health Professional (CCHP) who has led multiple NCCHC accreditation processes. Additionally, of the **28** IMQ-accredited corrections facilities in California, Wellpath provides comprehensive health care services in **24** of them.

### Number of Current Operations/Contract Services

Wellpath currently provides services to 309 clients in 36 states.



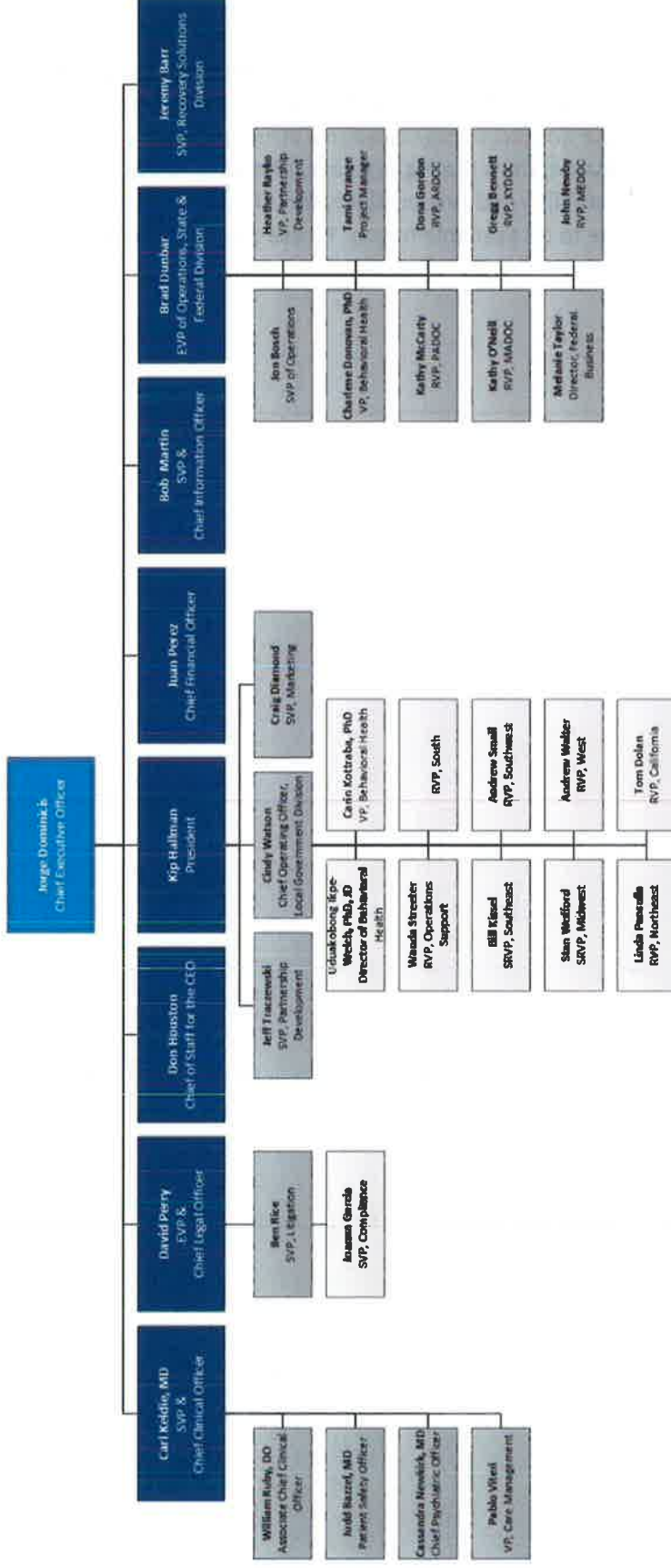
### ***II.1.c. Organization Structure***

Wellpath is focused on a strategic plan that allows our organization to work efficiently and promotes success through enhanced communication. All Wellpath employees function as a team, and every team member expects to be part of the solution. Our corporate organizational structure is simple, effective, and functional by design. It ensures that everyone, from the highest level of management to each member of our line staff, understands accountability and responsibility for all actions. As such, the full extent of our company resources will continue to be available to you. Please see the following company organizational chart.





Wellpath Organizational Chart

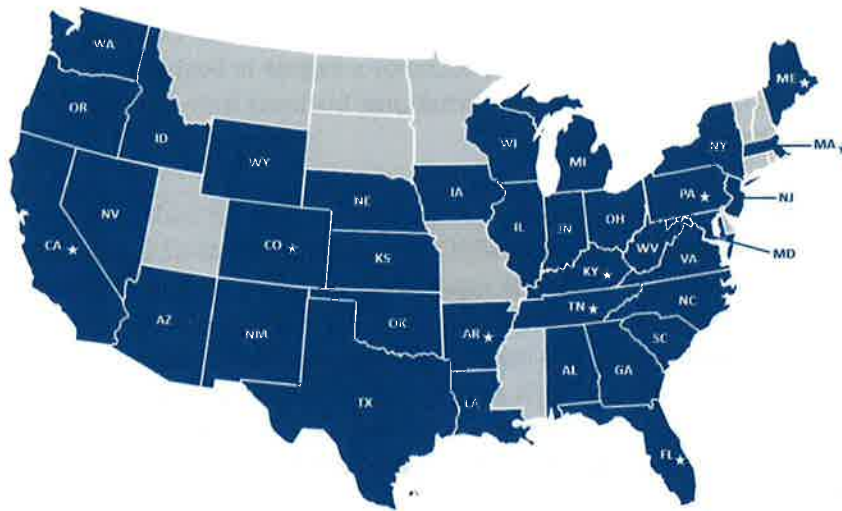






### II.1.d. Structure of National or Local Supervision

Our program is supported by our Home Office in Nashville, Tennessee and our California office in San Diego. In this section, we have provided an overview of the qualifications and experience of key leadership staff who will continue to serve Lassen County. These are more than just names in a proposal, but rather faces you see walking the hallways of the Jail and Juvenile Hall, supporting our program. Wellpath has nearly 15,000 employees nationwide and more than 1,800 employees throughout the State of California.



**Home Office\***  
1283 Murfreesboro Rd., Ste. 500  
Nashville, TN 37217

**California Office\***  
San Diego, California

**Florida Office**  
Deerfield Beach, Florida

**Mountain States Office**  
Centennial, Colorado

**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

*\*The Wellpath California Office and Home Office are responsible for supporting this contract.*

### National Supervision – Executive Management Team

The Wellpath Executive Team has more than 400 years of combined correctional health care experience, and the entire team will be fully engaged in the continued operation of programs and services for Lassen County.

**Jorge Dominicis**  
*Chief Executive Officer*



Mr. Dominicis serves as the Chief Executive Officer for Wellpath. His role is to ensure operational excellence and to drive the organization's strategic focus. Before joining Wellpath, Mr. Dominicis served for 10 years as President of GEO Care, during which time GEO Care increased revenue six-fold. Prior to that, he served 14 years as Vice President of Corporate Affairs at Florida Crystals Corporation, where he was responsible for all governmental and public affairs activity at the local, state, and federal level, as well as for the coordination of community outreach and charitable involvement. Mr. Dominicis also served in various public and government policy positions in Florida, including the St. Mary's Medical Center Governing Board and the Criminal Justice Commission. He holds a bachelor's degree in business administration, finance, and international business from Florida International University.

**Kip Hallman**  
*President*



Mr. Hallman became President of Wellpath in October 2018, following the combination of CCS and CMGC, where he served as CEO. He brings more than 30 years of diverse experience, including co-founding and growing a large national health care services company and leading the successful turnaround of a leading national diagnostic imaging company. As President, he is responsible for ensuring we exceed the expectations of our customers. Mr. Hallman has a passion for leading our team to achieve great results for our people, our patients, and our client partners.

**Don Houston**  
*Chief of Staff*



As Chief of Staff, Mr. Houston assists the CEO with the execution of strategic initiatives throughout the organization. He previously served as President of the State and Federal Division, overseeing business development, administration, and overall management of our state, federal, and private prison business. Mr. Houston has more than 30 years of correctional experience, including 18 years as a Senior Regional Vice President with a major private corrections corporation and 7 years with the Texas Department of Criminal Justice. He has extensive corporate experience in project development, operations, and administration, as well as experience working with a variety of state legislatures, local governments, and executive branches of government.

**Juan Perez**  
*Chief Financial Officer*



Mr. Perez is a highly capable executive with extensive accounting and finance experience, including public accounting, as well as public and private equity-sponsored companies. He joined Wellpath in April 2016 with a solid background in mergers, acquisitions, and divestitures. Mr. Perez's industry experience includes high tech, manufacturing, resort, health care, real estate, telecom, financial services, and ISPs. He is an excellent leader with proven experience leading and assembling large finance organizations while increasing productivity. Mr. Perez is a licensed CPA.

**Cindy Watson**  
*Chief Operating Officer,  
Local Government Division*



Ms. Watson brings more than 25 years of health care experience to her role as Chief Operating Officer for the Local Government Division. Her background includes a diverse blend of leadership operations, client services, technology, marketing, product management, sales, and business development. Ms. Watson has provided start-up direction, turn-around management, strategic business development, integration of acquisitions, and has driven organic growth. She combines exceptional communication skills at the executive and board level with team building, problem-solving, and the successfully balancing of strategic vision and tactical execution to achieve outcomes.

**Carl Keldie, MD**  
*Chief Clinical Officer*



Dr. Keldie joined Wellpath as Chief Clinical Officer in 2015. His primary responsibility is ensuring that we provide our patients with quality health care. He also works as a liaison between medical staff and administration to support positive channels of communication while ensuring appropriate care to all patients. Dr. Keldie has more than 30 years of clinical and administrative experience, including the provision of direct patient care in primary care, urgent care, and emergency medicine in civilian, Department of Defense, and correctional medicine settings. His professional memberships include the American Medical Association, Society of Correctional Physicians, American Correctional Association, and the National Commission on Correctional Health Care. Dr. Keldie earned a bachelor's degree in biology from the University of South Florida and a doctor of medicine degree from the University of South Florida College of Medicine. He is a fellow of the American College of Emergency Medicine and is board certified by the American Board of Emergency Medicine.

**Bob Martin***Senior Vice President &  
Chief Information Officer*

Mr. Martin has been with Wellpath since the founding of legacy company CCS in 2003. He has over 32 years of information technology experience, including 20 years in the health care arena. Mr. Martin is responsible for overseeing technology services and coordinating major project management activities. Currently, his team supervises the daily production and development of Wellpath internal systems and networks, as well as external IT needs, including various electronic medical records products. Mr. Martin has a bachelor's degree in engineering with an emphasis in computer science from Michigan State University.

**David Perry***Executive Vice President &  
Chief Legal Officer*

Mr. Perry joined Wellpath in August 2015 as our Chief Legal Counsel, overseeing all legal matters and serving as the primary legal advisor to Wellpath. As member of the senior leadership team, he leads and manages legal, compliance, and risk management functions for Wellpath. Most recently, Mr. Perry was a partner at Holland & Knight, a leading global law firm. As a corporate and securities attorney, he focused on corporate finance, securities, and mergers and acquisitions. Mr. Perry worked on numerous financings of significant size, representing organizations in media, food products, transportation, biotechnology, and other industries. He received his bachelor's degree from the University of Notre Dame and his juris doctor's degree from Yale Law School.

**Jeff Traczewski, MBA, CCHP***Senior Vice President,  
Partnership Development*

Mr. Traczewski has been a health care executive for more than 25 years, with more than 20 years of experience managing health care teams. He joined Wellpath in 2009 as the Vice President of Partnership Development. In 2013, Mr. Traczewski became the Regional Vice President of Operations for the Kentucky DOC. In 2018, he returned to Partnership Development as Senior Vice President. Prior to working with Wellpath, he held positions with several health care companies, including Executive Vice President for Cardinal Health, Strategic Director of Women's Healthcare for HCA, and Oncology Product Manager for Zeneca Pharmaceuticals. Mr. Traczewski received his bachelor's degree in Business Administration from the University of Louisville and holds a master's degree in Marketing from Western New England College.



**Wanda Streeter, RN, CCHP**  
*Regional Vice President,  
Operations Support*



Ms. Streeter has more than two decades of experience in corrections. She began her career in correctional health care as an LPN and before long, she was an RN working as the CCS Health Services Administrator (HSA) for the Norfolk City Jail in Virginia. Ms. Streeter was so adept at running her facilities that she was asked to provide on-site support for the start-up team in DeKalb County, Georgia in 2011. Her proficiency in total patient care and operational management helped propel her to the position of Regional Manager for the State of Georgia, and later Regional Vice President for Georgia and South Carolina. Ms. Streeter has also served Wellpath as a Regional Director of Clinical Services.

**Carin Kottraba, PhD, CCHP**  
*Vice President of  
Behavioral Health Services,  
Local Government Division*



Dr. Kottraba is a dynamic health care executive with more than 15 years of experience in correctional health care. She has vast experience in executive management and direct patient care, including consulting with government and private industry, and is a Certified Correctional Health Professional (CCHP) through the NCCHC. Prior to joining Wellpath, Dr. Kottraba worked as Director of Operations for Liberty Healthcare Corporation and as an Executive of the California Department of Corrections and Rehabilitation (CDCR). She received dual PhDs in Clinical Psychology and Industrial/Organizational Psychology from the California School of Professional Psychology in San Diego.

**Charlene Donovan,  
PhD, RN, PMHNP-BC**  
*Vice President of Behavioral  
Health for Corrections*



Dr. Donovan joined legacy company CCS in 2003 and currently serves as Vice President of Behavioral Health for Corrections for Wellpath. She received her PhD in Clinical Psychology from The University of Memphis, and has spent her entire professional career in the correctional behavioral health field, including several years as the Director of Mental Health Services for a state correctional program. Dr. Donovan holds Psychologist licensure in numerous states, the ASPPB Certificate of Professional Qualification, and Registration with the National Register of Health Service Providers in Psychology. She also served on the NCCHC committee that designed and developed the Correctional Health Professional certification process and examination for Mental Health Professionals (CCHP-MH).

**Cassandra Newkirk, MD**  
*Chief Psychiatric Officer*



Dr. Newkirk joined Correct Care Recovery Solutions (CCRS) in 2005. Her career spans over 32 years in forensic psychiatry and correctional mental health services administration. Having previously served as Chief Medical Officer for CCRS, Dr. Newkirk is now the Chief Psychiatric Officer for Wellpath, making her the psychiatric leader for CCRS clinical activities while adding oversight duties for Wellpath psychiatric correctional programs. Immediately prior to joining CCRS, she was the Director of Mental Health at Rikers Island in New York. Dr. Newkirk practiced general and forensic psychiatry in Atlanta with faculty appointments at Emory University and Morehouse Schools of Medicine, and currently holds a voluntary faculty position at Florida International University. She also served as Deputy Commissioner and Chief Psychiatrist for the Georgia Department of Corrections. Dr. Newkirk has held a variety of positions on professional-related organizations, including the American Correctional Health Services Association, Florida Psychiatry Society, and the Georgia Psychiatric Physicians Association. She received her bachelor's degree from Duke University, her doctor of medicine degree from the University of North Carolina at Chapel Hill, and a master's degree in business administration with emphasis in health care management from Regis University. Dr. Newkirk completed her residency in psychiatry at Emory University School of Medicine and is board certified in general and forensic psychiatry.

**Johannes Dalmasy, MD**  
*Chief Psychiatrist  
for Corrections*



Dr. Dalmasy is a board-certified psychiatrist whose correctional health care career began more than 20 years ago with the Federal Bureau of Prisons. He has experience as a staff psychiatrist, Regional Medical Director, and Medical Director for CMHS, LLC, a private provider of mental health services to local detention facilities in Maryland. Dr. Dalmasy also serves as an assistant professor of psychiatry at the University of Maryland School of Medicine, and is part of the teaching faculty of the University of Maryland-Johns Hopkins University joint forensic psychiatry fellowship program. His other areas of expertise include sports psychiatry and cross-cultural mental health derived from his many years of consulting roles for professional sports organizations, including the Baltimore Orioles and Major League Baseball. Dr. Dalmasy completed his specialty training at the Institute of Psychiatry and Human Behavior of the University of Maryland in Baltimore.

**William Ruby, DO, CCHP**  
Associate Chief  
Clinical Officer



Dr. Ruby has practiced in multiple areas of medicine, including community-based clinics, public health agencies, academic institutions, and correctional medicine. His passion for treating patients began immediately after training when he was the Director of Primary Care for the Center for AIDS Research and Education. Dr. Ruby furthered his reach of patients and administrative duties as the Medical Director for the New York State Department of Corrections. He was then recruited to The Johns Hopkins University School of Medicine as Assistant Professor of Medicine in the Infectious Diseases Division, where he developed the first telemedicine program, which remains active today, and concurrently held the position of Deputy Director of Clinical Services for the Maryland Department of Public Safety and Correctional Services. In order to better the treatment of HIV disease, he was recruited to a major pharmaceutical company where he was the National Medical Director for the Community, Corrections, Managed Care, and Governmental Affairs markets, where he was instrumental in bringing HIV and HCV medications to market. Dr. Ruby joined Wellpath in 2011.

**Judd Bazzel, MD**  
Patient Safety Officer



Dr. Judd Bazzel joined Wellpath in 2005. He received his Medical Doctorate from the University of South Alabama College of Medicine in Mobile, Alabama and completed a residency in Family Medicine at the University of South Alabama Medical Center. Dr. Bazzel began working in correctional settings during his time as Chief Resident, and dedicated himself to the practice of correctional medicine in 2004. He is a member of the Society of Correctional Physicians and the Academy of Correctional Health Professionals. Dr. Bazzel has special interests in the management of withdrawal from substances of abuse. He assists in leading our clinical team and provides a hands-on management style when assisting our nurses and on-site medical practitioners. Dr. Bazzel began his career with Wellpath as our Medical Director in Nashville, TN, giving him hands-on experience with large jails.

**Dawn Ducote,**  
LCSW, CCHP, CPHQ  
Director of CQI



Ms. Ducote is a Licensed Clinical Social Worker who has spent the majority of her career in correctional behavioral health and community mental health agencies. Advocacy for patients and ensuring quality and necessary services for at-risk populations are her passions. Dawn oversees the Wellpath Continuous Quality Improvement Program, which ensures that all patients in our care receive diagnostic and treatment services in the most expeditious and appropriate manner, while minimizing risk for our clients. She is responsible for quality assurance, effective clinical operations, and client satisfaction. After working in a subcontracting role for several years, Dawn officially joined Wellpath in 2009 as CQI Coordinator. She was promoted to Director of CQI in 2013.



**Pablo Viteri,**  
**MS, MHP, CCHP**  
*Vice President of  
Care Management*



Mr. Viteri has more than two decades of experience as a supervisor and utilization manager in national managed care organizations. As Vice President of Care Management for Wellpath, he is responsible for supervising care management staff across the U.S. Mr. Viteri focuses on improving the efficiency and effectiveness of Wellpath health care services, implementing improved processes as needed to promote accuracy while conserving resources. He is also skilled in productivity reporting and in developing yearly departmental budgets. Mr. Viteri has a Master's of Science degree in Health Services Administration from Nova Southeastern University's School of Business and Entrepreneurship in Fort Lauderdale, Florida.

### **Local Supervision – Regional Management Team**

Strengthening communication and operational workflows in the Wellpath program is our experienced Regional Management Team, containing individuals who are already familiar with the Lassen County medical program, as well as California-specific standards. They will continue to ensure a compliant program that meets or exceeds your needs and expectations.

Clinical oversight is provided by Senior Regional Medical Director, Dr. Raymond Herr. John Eby, Regional Mental Health Director, oversees our mental health program. Operational oversight is the responsibility of Regional Director of Operations, James Roemmich, and Regional Vice President, Tom Dolan, who reports directly to our Chief Operating Officer for Local Government, Cindy Watson.

Mr. Roemmich and/or Mr. Dolan will continue to visit the Jail and the Juvenile Hall regularly to evaluate the medical processes and meet with facility administration to ensure your continued satisfaction with our services. Our Director of Partner Services, Jack Jadin, will serve as the Wellpath client liaison to Lassen County for all aspects of the contract to ensure your continued satisfaction with our service. **This is our corporate pledge to Lassen County as your medical provider.**



**Tom Dolan, CCHP**  
*Regional Vice President*



Mr. Dolan is a Certified Correctional Healthcare Professional (CCHP) with more than 10 years' experience in the correctional health care industry. As an accomplished executive with a proven record of leadership across both single and multi-site facilities, he provides valuable leadership and oversight for health care staff in his region. Mr. Dolan excels in building consensus and creating unified teams that work collaboratively to achieve common goals to improve performance. As a strategic thinker and problem-solver, he is comfortable taking on tough challenges, reorganizing and upgrading teams, and assuming a high level of responsibility.

**James Roemmich,**  
**MBA, BSN, RN, GCEC**  
*Regional Director  
of Operations*



Mr. Roemmich has served in the role of Regional Director of Operations for since 2016, having previously worked as a Program Manager/HSA for the Shasta County Jail and Juvenile Hall in Redding, California. In his current role, he oversees operations for the sites in his region and works in conjunction with jail administration and on-site health care staff to ensure compliance with our goals and objectives and our clients' operational plans. Mr. Roemmich reviews operations and program practices to ensure effective and compliant procedures, including staffing, hiring, training, retention, and performance reviews. His clinical and business experience make him a valuable contributor to the success of our operations.

**Raymond Herr, MD**  
*Senior Regional Medical  
Director & President, CFMG*



Dr. Herr has been involved in correctional health care for more than two decades, having served as a Medical Director in many county jails, and later as an Associate Medical Director and Chief Medical Officer. In addition to his correctional experience, Dr. Herr worked with Kaiser Permanente for many years in their Family Practice Department, providing primary care services and serving as a key member of their utilization management team. His correctional experience, strong primary care skills, and utilization management experience make him an ideal fit for his current position as Regional Medical Director, with clinical oversight of all provider services at our client sites in California. Dr. Herr is also the President of California Forensic Medical Group (CFMG).

**John Eby, MA, LMFT**  
*Regional Mental  
Health Director*



Mr. Eby is a Licensed Marriage and Family Therapist with more than a decade of correctional mental health experience. He served as a Mental Health Supervisor at CFMG adult and juvenile facilities in Nevada County, California from 2008 through 2016. In June 2016, he was promoted to Regional Mental Health Director with responsibility for overseeing and mentoring mental health staff at our client facilities in his territory. Mr. Eby received his Master of Arts degree in Clinical Psychology with Addiction Specialization from John F. Kennedy University in Moraga, California, and his Bachelor of Arts degree in Liberal Arts from Mesa State University in Grand Junction, Colorado.

**Jack Jadin**  
*Director of Partner Services*



Mr. Jadin has more than 28 years of law enforcement experience, with approximately 20 of those years directly related to service in the corrections division. He has more than 12 years of supervisory experience in corrections with progressively increasing levels of responsibility. Mr. Jadin formerly served as the Jail Administrator for the fourth largest jail in Wisconsin with a budget of over \$19 million and a staff of approximately 180 people. He also has experience in contract management and bid writing. Mr. Jadin will be responsible for ensuring communication between facility administration and the Wellpath Home Office, as well as working with our Operations Team to ensure compliance with all appropriate points of service. He will be fully accessible as a client liaison for the duration of the contract.

**Jamie Lewis**  
*Retired Undersheriff,  
Wellpath Consultant*



James (Jamie) Lewis served for more than 30 years with the Sacramento County Sheriff's Department before retiring in 2016 as second-in-command. As Undersheriff, he led the day-to-day operations of more than 2,000 employees who serviced the 944 square miles of unincorporated Sacramento County. Prior to his appointment as Undersheriff, Jamie served for 6 ½ years as Chief of Corrections for Sacramento County, overseeing the operations of two jail facilities with an average daily population of 4,000 inmates, as well as the operation of a full-service, County-operated Correctional Health division. His experience in corrections includes the successful implementation of programs related to California's realignment (AB 109) and the successful award of jail construction bonds to build new facilities (SB 1022). Jamie is a member of several professional law enforcement associations and brings a wealth of experience as a consultant to correctional health services.



## II.2. Current Contracts

Wellpath is dedicated to continuously improving our services and program offerings. To illustrate our experience in the field of correctional health care, and to give Lassen County the opportunity to review and validate our credentials, we have provided a list of our current contracts in [Tabbed Attachment A](#). ***Please note that this information is marked TRADE SECRET.***

## II.3. Three Most Recently Lost or Terminated Contracts

Wellpath has responsibly completed all projects under which we have been contracted. In any instance where a contract exit was made prior to the original concluding date, we have ensured a smooth 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.

The following table identifies our three most recently lost or terminated contracts, including explanations of why each contract ended.

Client	Site/Facility	Adult ADP	Juv. ADP	Accred.	Contract Dates	Details
Douglas County, CO	Douglas County Jail	337	N/A	NCCHC, ACA, CALEA (Triple Crown)	3/1/16 – 12/31/18	When the contract came up for renewal, the County released a new RFP. CMGC lost during the rebid process.
Terrell County, GA	Terrell County Jail; Terrell County Correctional Institution	157	N/A	N/A	6/1/11 – 9/30/18	When the contract came up for renewal, the County released a new RFP. CMGC was the preferred technical bidder, but lost due to being underbid.
Smith County, TX	Smith County Jail; Smith County Low/Medium-Risk Facility; Smith County Juvenile Attention Center	780	20	N/A	10/1/15 – 9/30/18	When the contract came up for renewal, the County released a new RFP. CCS lost during the rebid process.

## II.4. Legal

Wellpath's litigation history reflects relatively modest losses for a business of our size and scope, and is directly reflective of the high standard of care we provide and the emphasis we place on quality and effective risk management. Utilizing a collaborative and cross-functional team approach, we proactively identify areas of risk before they develop into serious problems, then work to eliminate and mitigate those risks. This, coupled with a stringent quality assurance and patient safety program, enables Wellpath and its partner clients to avoid negative outcomes and costly litigation. We view this as a major differentiator between Wellpath and other companies in our industry.

Litigation in the governmental health care industry is common, as it is in non-governmental health care businesses. As one of the nation's largest providers of correctional health care (caring for nearly 300,000 patients nationwide), a certain amount of litigation is to be expected. Nevertheless, we believe our litigation history reflects relatively modest losses for a business of our size and scope, and is indicative of the high quality services we provide. A study published in the *UC Irvine Law Review* found an average volume of litigation in correctional environments to be 10 lawsuits per 1,000 inmates annually; [Wellpath's litigation frequency falls well below this national average.](#)



Wellpath has in place valid procedures for defending litigation brought by inmates related to the provision of health care. Our procedures address pro se as well as represented cases. The majority of lawsuits filed against Wellpath are pro se, where the plaintiff is not represented by legal counsel. Most of these suits are filed by inmates in our prison population, who tend to be individuals who are incarcerated for longer periods of time than those who are incarcerated in jails and detention centers.

**Nearly all of these cases are ultimately dismissed with no finding of liability against Wellpath.**

Wellpath has no pending judicial or administrative proceedings that are material to our business or financial capability, or our ability to perform the work requested in the RFP. There is no pending or expected litigation or other conditions that would affect the stability of our company in any way.

We have provided the requested litigation history for the bidding entity, CFMG, in **Tabbed Attachment B**. **Please note that this information is marked TRADE SECRET.** There are no investigations to report.

## **II.5. Operating Procedures**

### ***II.5.a. Have effective written procedures; describe and provide example***

As your incumbent medical provider, Wellpath has developed site-specific policies, procedures, and protocols for our staff at the Jail and the Juvenile Hall in accordance with facility policy and procedure, as well as applicable requirements of the NCCHC, ACA, and Title 15. The policies and procedures are reviewed and revised as Wellpath and/or facility policies are modified, no less than once per year, and approved by facility administration.

In **Tabbed Attachment C**, we have provided a *sample* Table of Contents from a Wellpath Policies and Procedures manual based on NCCHC and IMQ standards. **Please note that this information is marked TRADE SECRET.**

### ***II.5.b. Purchasing, by headquarters and/or at local level***

Wellpath conducts site-level purchasing at a local level and conducts major buying using national contracts.

### ***II.5.c. Accounting approach plus degree of audit and cost analysis support for local level***

We provide accounting, audit, and cost analysis support out of our San Diego and Nashville offices. Each contract has an assigned team member and manager that reviews all analyses as required.

### ***II.5.d. Invoicing and payment, from headquarters or local level***

Wellpath will continue to generate monthly invoices for services provided approximately 30 days in advance of the month of service. Lassen County will have 30 days to submit payment, which is due on the first day of the month of service.

We will reconcile the monthly average daily population (ADP) and bill Lassen County quarterly based on the variance from the contracted monthly ADP times the per diem rate in the contract. If costs for applicable services reach the aggregate cap within a contract year, we will provide details of all such services and their corresponding costs.



Thereafter, Lassen County will be billed for applicable services on a quarterly basis with the ADP reconciliation. At the end of the contract year—and after we have received all invoices and hospital claims—if total costs fall below the aggregate cap and equipment cap, we will provide details of all such services and their corresponding costs, along with a rebate.

### ***II.5.e. Frequency of communications and visits to local sites***

Wellpath can provide daily communication to Lassen County, as needed, and will continue to arrange regular site visits, minimally 4 times per year but generally 8-10 times per year.

## **II.6. Company Achievements**

Wellpath is proud to have received many awards and designations. In this section, we have provided a sampling of recent awards and designations bestowed upon Wellpath, as well as our achievements in California.

### ***Company/Site Awards and Designations***

#### **Accreditation Distinctions**

Each year, the NCCHC presents their Program of the Year Award to one standout program among the thousands provided by accredited jails, prisons, and juvenile facilities. In 2017, the Community Oriented Re-Entry (C.O.R.E.) Program at our Westchester County Correctional Facility in New York received this prestigious award.

In Valhalla, New York, Wellpath HSA Dr. Alexis Gendell and her team had a vision to provide additional services to our mental health patients within the Westchester County Correctional Facility. The Wellpath team worked directly with the Westchester County Department of Correction and community providers to make this vision a reality. The resulting Community Oriented Re-Entry (C.O.R.E.) Program was recognized by the NCCHC as their **2017 Program of the Year**.

The NCCHC also presents a Facility of the Year Award to one facility selected from among the nearly 500 jails, prisons, and juvenile facilities accredited by the NCCHC. A Wellpath site was named **Facility of the Year** in 2012, when the NCCHC recognized the professional delivery of health care services at the Chittenden Regional Correctional Facility in Vermont, whose health care program was managed by Wellpath (formerly CCS).

Wellpath has enjoyed unparalleled success in our accreditation experience. Many Wellpath sites have been named 100% compliant during their accreditation surveys. Furthermore, **we carry the distinction of counting 18 Triple Crown sites 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. In fact, the Triple Crown distinction is so rare, that since the establishment of the award in 1993, fewer than 100 sheriffs' offices have qualified."

#### **TJA Vendor of the Year Award**

In May 2015, the Texas Jail Association (TJA) honored Wellpath (formerly CCS) with the TJA's first-ever "Vendor of the Year" award. The surprise presentation was made by Sharese Hurst, TJA Executive Director, at the TJA's Annual Conference in Austin.





## **NAMI Service to Consumers Award**

In 2014, the Mental Health Management Unit (MHMU) at the Sedgwick County (KS) Detention Facility received the National Alliance on Mental Illness (NAMI) Service to Consumers Award. The MHMU was established in February 2013 with the goal of providing effective management and treatment of mentally ill offenders. Patients in the MHMU receive enhanced behavioral health and psychiatric services, including group programming aimed at addressing issues of mental illness and criminogenic functioning, discharge planning and case management services, activity therapy, and psychotropic medication treatment and monitoring.

## **California Achievements**

### **The Fresno and Tulare, California Transitions**

5,000 New Patients, 225 New Employees, 2 Counties, 1 Day. After 35 years in business, on July 1, 2018, Wellpath/CFMG experienced a first when it transitioned neighboring large counties, Fresno (3,000 ADP) and Tulare (2,000 ADP) on the same day. At the stroke of midnight, we added 5,000 new patients and more than 225 employees. In order to pull off this extraordinary feat, two large transition teams were assembled who spent months meticulously planning the transition strategies. In the end, the teams had to interview and train over 200 people in eight days in two locations, and then plan for the additional demands of over 100 transition team members. The massive effort required a multi-department synchronized solution across the company including human resources, finance, recruiting, operations, clinical, the executive team and IT that had to ensure CorEMR was live on day one. We know that new partners can be nervous to transition to a new vendor; the start sets the tone for the relationship, and we take great pride in offering the finest and most thoughtful transition experience in the industry.

### **Jail Based Competency Programs**

In July 2017, we launched a Jail Based Competency Program in one of our facilities and restored 30% of the patients within two months. Our program has gone on to be a model and has prompted the deployment of a similar program in another of our facilities in Stanislaus, CA. Below you will find some highlights and detail from the programs.

#### **Stanislaus**

We launched our latest felony program in Stanislaus, CA in February 2018. To date, this 12-bed program has successfully restored 6 patients with an average length of stay of 27.3 days, and has a waiting list of 20 inmates.

#### **Sonoma**

In July 2017, we launched an innovative felony and misdemeanor Jail Based Competency Treatment (JBCT) program in Sonoma, CA. The Sonoma, CA JBCT program features 10 felony and 16 misdemeanor beds, and provides treatment to patients who lack the mental competency to assist in their own legal defense. Since the program's launch, we have successfully restored 19 felony patients and 24 misdemeanor patients.



## II.7. References

We have selected the following client references that best communicate our strengths and our ability to meet and exceed the requirements and expectations for the program you have defined in your RFP. If desired, we will also gladly arrange for Lassen County personnel to tour any of our client facilities to see our programming in person.

Client	Site/Facility	Address	Contact	Ph.	Email	Adult ADP	Juv. ADP	Accred.	Contract Start Date
<b>Butte County</b>	Butte County Jail; Butte County Juvenile Hall	33 County Center Dr. Oroville, CA 95965	Lt. Jerrod Agurkis	530-538-7396	jagurkis@buttecoun ty.net	574	26	IMQ	5/1/02
<b>Humboldt County</b>	Humboldt County Correctional Facility; Humboldt County Juvenile Hall	826 4th St. Eureka, CA 95501	Sheriff Mike Downey	707-445-7251	hso@co.humboldt.c a.us	406	13	N/A	12/1/99
<b>Napa County</b>	Napa County Jail; Napa County Juvenile Hall	1125 3rd St. Napa, CA 94559	Lenard Vare, Dir.	707-253-4401	corrections@count yofnapa.org	228	12	N/A	7/1/00
<b>Nevada County</b>	Wayne Brown Correctional Facility; Carl F. Bryan II Juvenile Hall	925 Maidu Ave. Nevada City, CA 95959	Sheriff Keith Royal	530-265-1471	sheriff@co.nevada. ca.us	224	25	IMQ	2/1/92
<b>Placer County</b>	Auburn Main Jail; South Placer Jail; Juvenile Detention Facility	2775 Richardson Dr. Auburn, CA 95603	Sheriff Devon Bell	530-889-7800	dbell@placer.ca.go v	740	19	IMQ	10/1/88
<b>Shasta County</b>	Shasta County Jail; Shasta Juvenile Rehabilitation Facility	1655 W St. Reddin, CA 96001	Sheriff Tom Bosenko	530-245-6167	sheriff@co.shasta.c a.us	351	21	IMQ	6/1/08



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### III. MANAGEMENT

#### III.1. Personnel

##### *III.1.a. Recruitment Practices*

###### **Recruitment and Retention**

Wellpath has developed industry-leading talent acquisition and employee retention programs 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. We research rates of pay in different areas to ensure that our salary ranges remain competitive. By showing our employees that they are a valued part of our company, we are able to save our clients unnecessary operational expense and added costs created by turnover.

###### **Talent Acquisition**

Wellpath provides on-site support to clients through our skilled Human Resources department that facilitates the recruitment, development, and retention of health care professionals. Our dedicated talent acquisition team of Physician Recruiters, Nurse Recruiters, Managers, and Coordinators source high-potential candidates, screen applicants, and conduct interviews. Using competency-based behavioral interview questions and partnering with our clinical and operational specialists enables us to make informed hiring decisions. We perform 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.

Local, regional, and national recruitment campaigns keep a constant flow of qualified candidates within reach to discuss opportunities. Our recruiting team begins with our extensive candidate database, and concurrently sources through our broad resources for qualified candidates. Our first focus is recruiting locally and then, if circumstances merit, employing a nationwide search. National recruitment efforts focus on geographic locations where health care professionals are more plentiful and unemployment is higher, which increases the likelihood that candidates will be willing to relocate.

Wellpath uses the iCIMS Applicant Tracking System (ATS) to maximize talent acquisition. Hiring Managers work with a dedicated recruiter and the Wellpath recruiting team to post any open positions in the ATS. The iCIMS Talent Acquisition Software Suite leverages mobile, social, and video technologies to better manage the talent acquisition lifecycle. iCIMS helps us build talent pools, in addition to automating our recruitment marketing, applicant screening, and onboarding processes. The talent acquisition process is illustrated in the following figure.

## The Wellpath Talent Acquisition Process



### *National Recruiting & Sourcing Tools*

With continuing challenges of lower unemployment rates for health care professionals, we are vigilant in our constant search for talent. Wellpath continually looks for cutting-edge ways to source and communicate with candidates while also using tried-and-true strategies, like extending a phone call to a candidate directly. On an ongoing basis, we use a wide variety of national recruiting tools that provide access to health care professionals throughout the country, including:

Wellpath also uses resources that share job postings and information across dozens of other 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 the Applicant Tracking System that our recruiters use to find the best candidates in the shortest amount of time.

### *Internal Recruiting*

Wellpath posts all job openings internally and externally. Internal applicants are given initial consideration for opportunities based on our desire for team members to be able to advance their careers. Wellpath employees are eligible to apply for internal opportunities after completing six months in their current role, provided they are in good standing.

If a team member is interested in transferring to another position and/or location, as part of the internal application process, he or she must answer questions that validate they have informed their manager of their interest in another position or site. Interviews are typically conducted by the Hiring Manager or regional staff. We also welcome input from our clients during the interview process for key positions.

### *College and University On-site Recruiting*

A key part of the Wellpath recruitment plan includes reaching out to local nursing schools and residency programs to attract health care professionals to a career in corrections. We have developed programs for nursing students in many of our client facilities, and we are expanding our outreach to residency programs. We have found that by increasing community interest and education regarding corrections, we have been able to attract and recruit health care providers who may have otherwise overlooked a career in our industry. **We currently have a contract with Lassen Community College that allows their LVN nursing students to come into the Lassen County Jail Facility to perform clinicals.**



### *Metrics and Technology*

We are strongly invested in technology to promote our open positions and provide us with robust analytics to help us understand the growing needs in staffing, as well as the outcomes of our efforts. Following are the results of our recruiting efforts from 2018:

- Total Hires – 2,018 (positions filled from internal and external applicants)
- Average Hires per Month – 819
- Average Time to Find – 22 days
- Average Time to Accept – 32 days
- Average Time to Fill – 35 days

### *Salary and Benefits*

Our goal is to retain all qualified, properly credentialed individuals who have the attributes to succeed as a part of our team, with Lassen County's input and approval. Wellpath will ensure the compensation offered to these employees is at least equivalent to what they are currently receiving, including providing full benefits on Day One for employees who qualify for full benefits in their current position.

Wellpath offers competitive salaries and benefits to attract and retain qualified staff. 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. Our benefits program exceeds market standards and is designed to attract and retain health care 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 such as 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

### *Employee Benefits Program*

Wellpath provides employees with a comprehensive, flexible benefits program that focuses on their health and well-being. All new hires, transitioning employees, and current staff are able to enroll in Wellpath benefits through our online and mobile enrollment system, which streamlines communications, education, forms, and all other benefit-related options.



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, Wellpath offers numerous incentives for employees who take steps towards healthier lifestyles, rewarding them for making healthy choices; a wellness incentive program is an important part of Wellpath's commitment to healthy living.

As part of our wellness initiatives, members are rewarded through the MedEncentive programs for learning information that will help improve health. MedEncentive is a program designed to help our employees, in consultation with their doctor, better understand and self-manage their health. Members also gain the peace of mind that comes from knowing their doctor's care is consistent with "best practices" as published by independent and highly credible sources. Each time members visit their physician, they receive an invitation to complete an Information Therapy prescription. Completion is easy, and members earn a \$15 reward each time they complete an Information Therapy prescription.

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. To do this, **we subsidize the majority of the total cost of health care** and tier the out-of-pocket bi-weekly premiums so that staff with lower income pay less than staff who earn higher wages. Wellpath also offers 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.

Preventive care is essential for maintaining well-being and a high quality of life. Therefore, we encourage our employees to use the benefits we offer to improve their overall wellness. Simply by obtaining or maintaining an annual physical on file (within the last year), employees receive a \$50 per-paycheck discount off their medical plan premium.

Financial wellness is an important aspect of retention, and Wellpath offers multiple retirement and other saving options for employees. In addition to a traditional 401k with a company match, Wellpath offers a Roth IRA, 409A deferred compensation plan, college tuition reimbursement, and a 529 College Savings Plan. Wellpath employees also have the opportunity to meet, at no cost, with a licensed financial advisor who is knowledgeable about our company-sponsored benefits.

Wellpath offers a competitive paid time off program based on years of service, as well as paid holidays throughout the year.

### Employee Retention

Consistent staffing improves the quality of patient care and minimizes issues that can lead to grievances and lawsuits. We understand the importance, for continuity of care, of ensuring that the majority of our employees are full-time employees. Wellpath focuses on prudent staff deployment in order to promote high efficiency, fewer mistakes, and improved morale. As a result, we have an excellent retention rate with low turnover.

Wellpath is constantly taking action to improve employee retention rates for all of our locations. We are proud to say that over 96% of all Wellpath jail positions are filled with permanent employees.



Wellpath offers benefit-related incentives to entice those who may be looking at a slightly higher rate of pay as per diem staff to commit to full-time employment. We are proud to say that **over 96% of all Wellpath jail positions are filled with permanent employees** (any open positions are temporarily filled through overtime and PRN staffing pools). We attribute our retention success and low turnover 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 begins with motivated employees who are given the tools they need to be successful in their careers. Caring for and respecting patients in correctional facilities requires hiring ethical and competent professionals, and then building upon their skills through continued training initiatives.

Wellpath has a dedicated Organizational Development Department that offers a full range of professional development opportunities, including training programs, continuing education, clinical exposure, promotion preparation, succession planning, and peer reviews. Our dedication to our employees' continued development and long-term professional satisfaction creates lower turnover, reduces costs due to replacement and training, and strengthens team spirit through mutual respect and recognition of each individual's contributions.

Wellpath encourages employees to take advantage of opportunities for advancement and professional growth. Wellpath offers tuition assistance to employees as an opportunity to advance their skills and their career.

### *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 that have done an outstanding job upholding our high standards for patient care.

### *Employee Recognition*

Wellpath attracts and retains skilled and competent personnel through a number of employee incentives. However, incentives alone do not build loyalty; a friendly company culture ensures the long-term satisfaction of our employees. We understand that the primary reason for dissatisfaction in the health care field is feeling undervalued. From the recruiting process through the life of their career, each person is treated with respect, incentivized and rewarded for dedication and performance, and viewed as a valuable asset of our team.

Wellpath presents recognition awards each month and quarter based on attendance, customer service, teamwork, and overall performance. On an annual basis, the leadership team of each Wellpath business unit chooses one individual from each of the quarterly 5H Award Winners to be nominated for the President's Award. All nominees for the quarterly award, Quarterly Award Winners, and President's Award Winners are recognized on the Wellpath website and are eligible to receive 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 any full-time staffing needs.

### *Human Resources Hotline*

Wellpath offers a 24/7 Human Resources hotline for employees who need guidance regarding an issue outside of regular business hours.

### *Wellness Program*

Wellpath places a great deal of importance on employees' health and well-being. We encourage our team members to participate in the Wellpath Wellness Program, which offers 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.

### *Employee Assistance Program*

Wellpath offers an Employee Assistance Program (EAP) through Aetna. 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 Aetna EAP also gives employees access to a variety of discounted services and programs designed to promote health and wellness.

### *Dare to Care*

Wellpath established the Dare to Care Employee Assistance Fund to support valued team members when they need it most. Wellpath employees and their eligible dependents can apply for economic assistance to help meet their needs in the event of 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 the 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 nearly \$913,000 in financial assistance** to more than 500 employees and their families in need their time of need.

In 2017, our teams in Texas and Florida were significantly impacted by Hurricanes Harvey and Irma, with many displaced from flooding and requiring immediate assistance. In addition to continuing to pay these employees while their facilities were closed, **Dare to Care issued more than 95 grants to affected team members, totaling approximately \$200,000.**

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



### ***III.1.b. Equal Employment Opportunities***

Wellpath is an Equal Employment Opportunity (EEO) employer with a thorough diversity policy in place to appropriately guide our 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 preference, marital status, age, disability, or national origin.

### ***III.1.c. License/Certification, Background Check Requirements***

#### **Background Screening**

Wellpath will continue to cooperate fully with any investigations conducted by Lassen County. We will continue to provide Lassen County with the name, date of birth, local address, social security number, and copy of driver's license for all employment applicants. Wellpath also conducts a background investigation as a part of the application process. All proposed Wellpath staff, including any subcontractors, will be subject to a criminal records check, fingerprinting; additional random drug screens will be conducted as needed. All screened applicants will visit the Lassen County Jail and/or Juvenile Hall prior to a formal decision of employment by Wellpath. Final selection is subject to approval by Lassen County.

#### **Personnel Files**

Once on-site personnel are selected, Wellpath provides applicable certification and licensing information to Lassen County. Prior to employment, Wellpath provides the County with copies of all 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.

Wellpath ensures that personnel files (or copies thereof) of Wellpath and contract employees assigned to the Jail are maintained at the Home Office and on site, and are readily available to the County. Personnel files include copies of current registration or verification certificates for licensed practitioners. Wellpath makes updated data and other relevant information available to the County upon request.

#### **Licenses and Certifications**

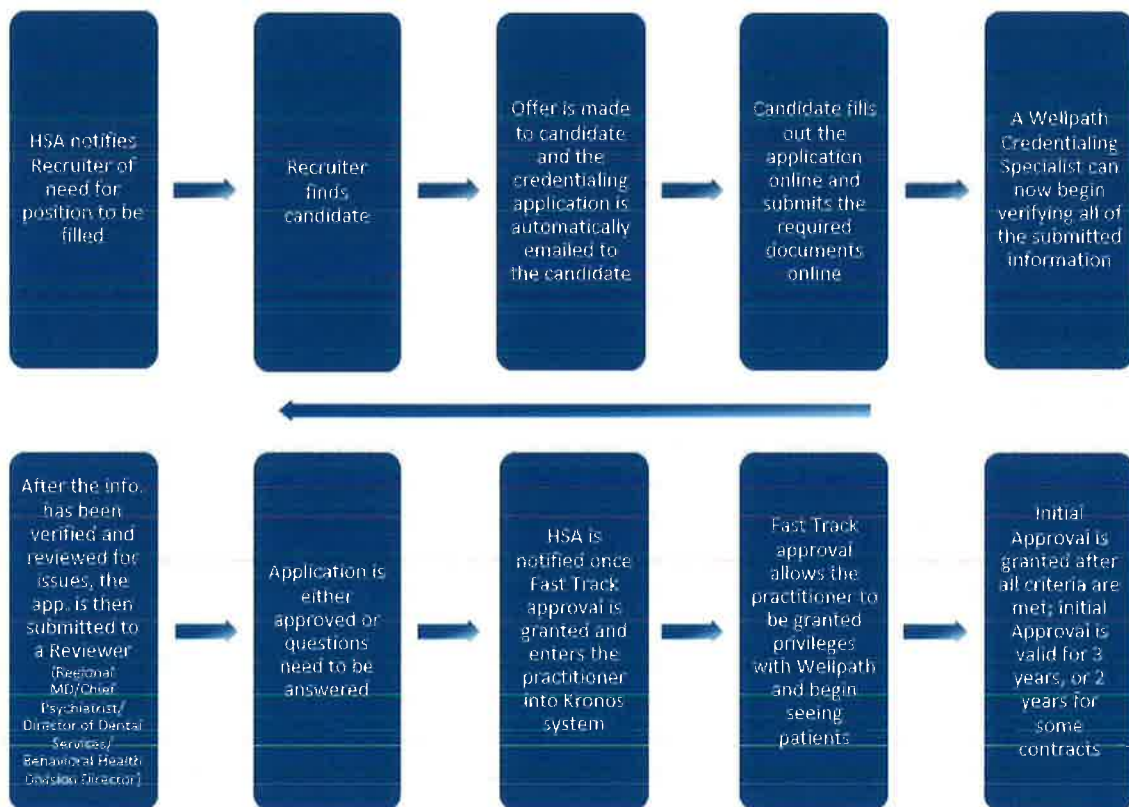
Medical care services are provided by persons who are fully qualified and appropriately licensed, certified, or registered in the State of California. Wellpath ensures that all employees and contractors are properly licensed or certified for their positions.

Wellpath has all applicable employees attest to their completion of any annual training necessary to maintain their licenses and/or certifications. All health care personnel maintain current first aid and CPR/AED certification and attend appropriate workshops to maintain their licensure. Wellpath also maintains proof of malpractice insurance for all applicable employees.

## Credentialing and Privileging

Wellpath has a credentialing process to ensure all medical personnel are up to date on state licensure requirements. All direct care providers must complete the Wellpath credentialing process prior to starting work. The credentialing process (described below) begins as soon as we determine we will be making an offer of employment to the candidate. The Wellpath Credentialing Department oversees credentialing activities.

### The Wellpath Credentialing Process



Wellpath refers to the process of granting interim privileges as Fast Tracking. To initiate the Fast Tracking process, the Health Care Practitioner (HCP) must submit all required forms, including:

- 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 all of the information listed in the following table. Once all of the verifications have been completed and all files have been submitted, a Review Committee reviews the HCP's credentialing file and denies or grants the HCP interim privileges. Final Initial Approval is given after references and all required documentation have been submitted and verified. Wellpath requires all HCPs to be re-credentialed every three years upon 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 program 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 accredited residency program	American Medical Association (AMA) report
Never been subject to any 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 provider practiced	National Practitioner Data Bank
Board certification in listed specialty (where certification is applicable)	American Medical Association (AMA) report

#### ***III.1.d. Staff Training and Personnel Development***

Wellpath offers professional development and training opportunities, and will continue to work with Lassen County to ensure that on-site personnel receive corrections-specific training opportunities. We offer both in-house and community opportunities for continuing education programs applicable to a career in correctional health care. By encouraging our employees to take advantage of these opportunities, we are building an even stronger, more professional staff equipped to meet our clients' diverse needs. For detailed information regarding Wellpath training initiatives, please see sections [III.1.g Continuing Education](#) and [III.1.h In-service Training](#).



### ***III.1.e. Orientation of New Personnel***

Wellpath will continue to provide appropriate orientation and training for all health care 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 will also continue to extend appropriate educational offerings to Lassen County personnel and train custody staff in medical issues as requested.

Wellpath will submit an orientation program for all health care staff. We will continue to provide Lassen County with comprehensive orientation curricula, schedules, appropriate forms, tracking and recordkeeping, and required documentation to support evidence of orientation of personnel. Each new employee will receive a binder containing a copy of the Wellpath Onboarding Book of Knowledge, a spreadsheet that outlines the required onboarding steps all health care staff must complete, as well as additional required onboarding steps for specific positions.

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. All new employees are required to participate in each of the three phases. The frequency and focus of each training phase is determined by the position and learning capacity of individual employees.

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

Critical to the future success of any new employee is his or her initial experience with the organization. To start the employee off on the right foot and to ensure a smooth transition, Wellpath offers a three-part onboarding process: Orientation, On-the-Job Training, and Follow-up.

##### ***Onboarding Step 1: Orientation***

Each new hire is scheduled to participate in an eight-hour learning experience (the physician orientation program has additional requirements), where they are introduced to our company culture, as well as policies and procedures. The program is designed to clearly establish expectations and to involve new employees in the success of the company.

##### ***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 that the expected knowledge is transferred. This portion is not considered complete until the new employee feels capable of performing the job.

##### ***Onboarding Step 3: Follow-up***

Follow-up is the last component of the onboarding process. During this component, the new employee has an opportunity to provide feedback about his or her experience with the Health Services Administrator (HSA). During this discussion, the HSA also shares information about his or her leadership style and performance expectations.



## Phase 2: Performance Enhancement

Performance Enhancement training consists of skills labs and webinars. On a scheduled basis, medical personnel participate in online training, as well as in-service learning opportunities such as “Lunch and Learn” sessions. Additionally, webinars and DVDs that interface with a variety of Subject Matter Experts (SMEs) are offered to staff members as applicable for their roles.

## Phase 3: Leadership Development

Wellpath uses Leadership Development training to invest in employees’ continued growth in order to develop leaders from within. Each training session varies in delivery and duration, and is designed to strengthen the leadership competencies of our employees. The Leadership Development training sessions are a collaborative effort between our Home Office and on-site leaders.

### *Wellpath Leadership Boot Camp*

Wellpath Leadership Boot Camp, held at our Home Office in Nashville, gives our new leaders the opportunity to learn about Wellpath values, policies, practices, and culture. Boot Camp is a three-day interactive experience focusing on People Skills, Patient Care, Processes and Procedures, Partnering with our clients, and operations. We will ensure that Jessica Blacka, HSA for the Lassen County Jail and Juvenile Hall, has the opportunity to attend our Boot Camp program.

## New Practitioner Orientation

New Wellpath practitioners (physicians and mid-level providers) undergo a structured New Practitioner Orientation process focused on critical thinking and clinical decision making in the correctional environment. The training is presented by Wellpath Chief Clinical Officer, Carl Keldie, MD, or designee. 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 an assigned coach/mentor to ensure a thorough onboarding and to provide them with resources for their clinical work in correctional health care. 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 Regional Medical Director.

Wellpath practitioners receive ongoing training and clinical decision support from the Wellpath Clinical Department. Our Associate Chief Clinical Officer and Regional Medical Directors mentor and coach our on-site providers. Regional Medical Directors are available to our on-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 health care issues.







### ***III.1.f. Employee Assistance Program***

Wellpath offers an Employee Assistance Program (EAP) through Aetna. 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 Aetna EAP also gives employees access to a variety of discounted services and programs designed to promote health and wellness.

### ***III.1.g. Continuing Education***

#### **Continuing Education Training Topics**

Our orientation and ongoing training emphasize our obligation to our client, the inmate population, our community, co-workers and other vendors. Our program covers such topics as:

- Quality improvement/risk management
- Facility security issues
- Health appraisals
- Advanced clinical provider care
- Employee injury/exposure plan
- TB screening
- Equipment usage
- Specific position orientation
- Facility-specific procedures
- Code of conduct (including Facility code of conduct)
- Inmate release/transfer – off-site referrals
- Emergency care
- Infection control program/OSHA guidelines/blood-borne pathogen policies
- Conditions of employment
- Drug-free workplace
- Medication management (pill call)
- Infirmary/observation care
- Medical records management
- Chronic care
- Safety issues
- Organizational / reporting structures
- Receiving screening (Intake health screening)
- Review of medical protocol and issues for pregnant inmates
- Alcohol and drug withdrawal
- Hepatitis immunization
- Sick call
- Americans with Disabilities Act (ADA)
- Policies and procedures
- EHR training
- Suicide prevention and intervention
- Confidentiality of records/HIPAA
- Sexual harassment and PREA
- UM referral process
- Segregation rounds
- Correctional health care and constitutional issues
- Stocking and restocking of medical supplies
- General health care issues (i.e., dietary, laboratory, radiology, etc.)
- NCCHC, ACA, and Title 15 standards of care
- Ethical Standards



While employees are ultimately responsible for their own development, it is our philosophy to provide Wellpath team members with 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 have the opportunity to complete a variety of CNE modules focused on topics commonly seen in the corrections environment.

### **Core Competency Training and Evaluation**

Wellpath offers regular training opportunities for nurses to keep their skills sharp and stay on top of the latest developments in clinical practice. 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 that 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 opportunity 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 successfully demonstrate the clinical skill covered in each CSC module in order to pass their evaluation.

Nurses are trained and evaluated on clinical skills essential for the effective and efficient delivery of health care in the correctional environment, including but not limited to conducting receiving screenings, health appraisals, and sick call. The 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.

### ***III.1.h. In-service Training***

We work closely with the County and HSA/PM to determine critical and appropriate training topics and training schedules. Wellpath also provides for continuing education through a staff needs assessment and identifies topics that can best be covered by Wellpath's regional training programs.

We provide annual education to include CPR, first-aid, and suicide prevention. If requested by the County, designated health care personnel attend departmental meetings scheduled by the County.

Wellpath maintains a video library and other reference materials that facilities can use 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 Lassen County Jail and Juvenile Hall. 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 are conducted in accordance with 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 a mandatory part of Wellpath new employee orientation and is also required annually for all Wellpath employees and subcontractors.

As HSA, Ms. Blacka is responsible for ensuring that health care personnel receive regular training on topics specific to the Lassen County Jail and Juvenile Hall. Wellpath identifies new topics on an ongoing basis through the Continuous Quality Improvement Program (CQIP). Additional training may be requested through a Clinical Training Request submitted to the Regional Director of Operations. Ms. Blacka maintains documentation of completed training in an individualized training record for each employee.

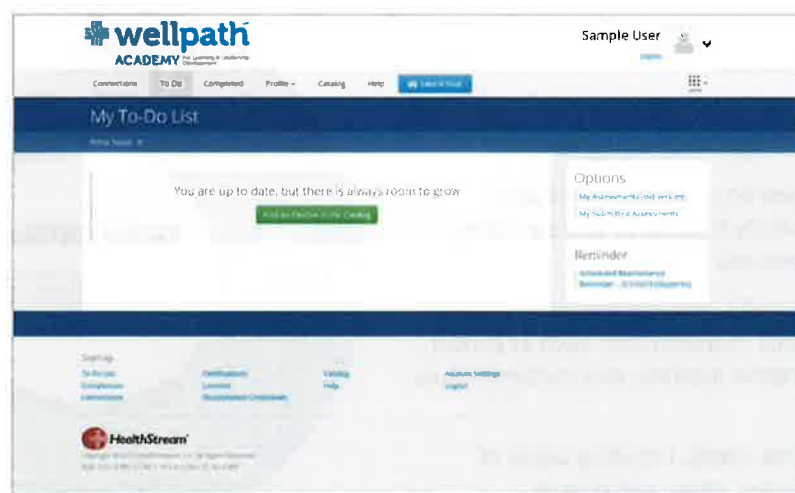
### Wellpath Academy Learning Center



Wellpath has partnered with HealthStream to create the 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. When an

employee signs in to Wellpath Academy, they are taken to the To Do tab, which shows all assigned training courses with due dates.

When new trainings are added to an individual's To-Do list, they receive an email notifying them of the new required training and the due date for completion. Mandatory courses for all Wellpath employees include, but are not limited to: HIPAA, Sexual Harassment, Bloodborne Pathogens, and Hazard Communication. Site-specific courses can also be added to the Learning Center.



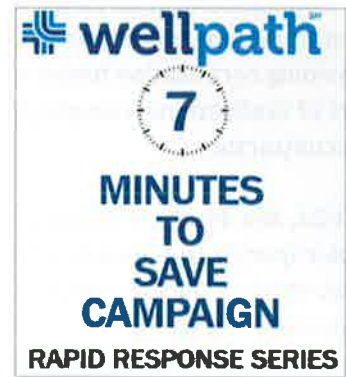
Once an employee has completed all assigned courses, they also have the option of completing elective courses to further their professional development. Further, if an employee completes a course outside of Wellpath, they have the option to add it to their completed courses transcript. Employees can also add information regarding certifications, licenses, resuscitation cards, and more to their personal profile.



## 7 Minutes to Save

Wellpath is mindful of the time requirements for providing guidance and education to both health care and custody staff. Therefore, we developed our *7 Minutes to Save* campaign, which presents topics vital to the management of urgent and emergent issues encountered within a correctional setting in **short, easy-to-comprehend training sessions**.

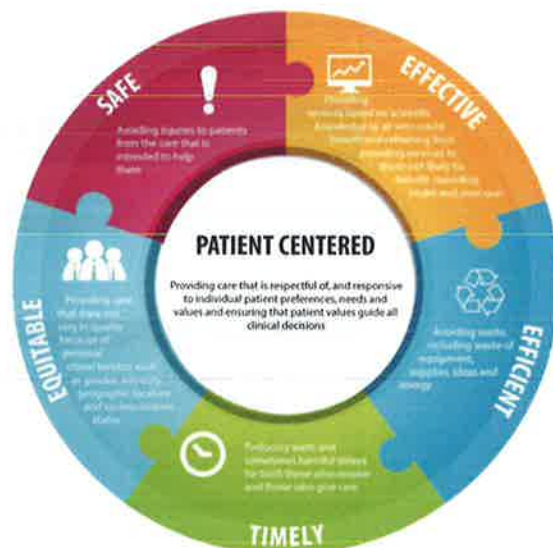
*7 Minutes to Save* is a Rapid Response Series designed to standardize our approach to trauma evaluation. The program addresses many topics, including suicide prevention, pregnancy, trauma, and optimized care for patients experiencing alcohol and drug withdrawal. Training topics for health care staff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



- Abdominal Pain
- Alcohol & Benzodiazepine Withdrawal
- Primary & Secondary Trauma Survey
- Altered Mental Status
- Chest Pain
- Ingestions
- Opiate Withdrawal
- Seizure
- Respiratory Distress
- Suicide Prevention
- Use of Force

In addition to our Rapid Response Series, the Wellpath Clinical Department has developed a *7 Minutes to Save* series focused on Patient Care. The goal of the Patient Care Series is to equip our 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 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
- **Equitable** – Provides consistent quality, without regard to personal characteristics such as gender, ethnicity, geographic location, and socioeconomic status
- **Efficient** – Avoids waste, including waste of equipment, supplies, ideas, and energy
- **Patient-centered** – Respects and responds to individual patient preferences, needs, and values, ensuring that patient values guide all clinical decisions





## Specialized Nurse Education

Wellpath has established a Nursing Services Department whose mission is to promote correctional nursing care focused on patients, formed in a collaborative and supportive environment, and grounded in evidence-based competencies and practice. The Wellpath Nursing Services Department is leading the charge in making Wellpath the leader in health care 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, Wellpath has developed educational materials that can be placed conspicuously in our sites to remind nurses of basic protocols, like **SBAR** communication (**S**ituation, **B**ackground, **A**pplicable nursing data, **R**quest/Recommendation).

SBAR	
<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.

### III.1.i. Performance Review

After a satisfactory completion of a six-month probationary period, each employee receives a position-specific evaluation from his or her direct supervisor. This process is repeated on an annual basis. The evaluation highlights areas of concern and includes recommendations for improvement. Unsatisfactory performance is documented, and employees who face the possibility of termination are counseled.

Wellpath conducts employee evaluations using designated forms for each full-time, part-time, and relief employee. Reviews are conducted three months from the date of active employment and annually thereafter according to hire date or date of contract renewal, depending on the specifications designated from the Home Office. Regular full-time and regular part-time employees are eligible for merit increases annually when they receive their performance evaluation. PRN/on-call employees are not eligible for merit increases at each review; however, the appropriateness of PRN rates is reviewed periodically, and PRN employees may receive a merit increase if written approval is received from the Home Office.

The Wellpath performance evaluation process is conducted as follows:

- Four weeks prior to the date on which evaluations are due, managers begin working on an employee's evaluation to ensure timely completion and delivery.
- The evaluation should be objective and give specific examples for feedback in the comments section of the evaluation. It should also include detailed analysis on areas for improvement, tasks performed effectively, and goals.
- The evaluation should encompass the entire timeframe since the last evaluation and managers should avoid using only very recent performance as the criteria evaluated.
- The supervisor will meet with the employee to review the evaluation. Both supervisor and employee should sign and date the evaluation.
- A copy of the evaluation should be provided to the employee.
- Annual merit increases are provided based on the contract renewal date.



- The original evaluation and signed Employee Action Form must be submitted to Human Resources for processing and proper filing.
- Evaluations are completed in a timely manner. Late evaluations must be accompanied by a detailed explanation as to why it is late and the merit increase will be made retroactive, so the employee is not penalized.

If any problems are identified, we will conduct performance reviews more frequently and report any unsatisfactory performance to the County.

### ***III.1.j. Utilization of Registry Personnel***

While some providers are forced to make heavy use of registry personnel because of high turnover and ineffective recruiting, our low turnover and strong PRN pool has virtually eliminated the use of registry personnel. Any use of registry personnel, would be strictly short-term.

Wellpath is able to minimize staffing vacancies in Lassen County through our organized, proactive recruiting and hiring practices. Our dedicated talent acquisition team of Physician Recruiters, Nurse Recruiters, Managers, and Coordinators actively sources high-potential candidates in California. We maintain a database of candidates that we have independently sourced, in addition to candidates who have shown interest in our opportunities. We also seek to form partnerships with local nursing programs to enhance the availability of qualified nurses, as described in section **III.1.a. Recruitment Practices**. Our recruitment strategies and sourcing tools allow us to act swiftly when vacancies and other potential staffing needs occur to ensure there are no long-term vacancies.

### **Staffing Coverage**

Wellpath ensures the same staff category coverage during periods of planned or unplanned absence. The Wellpath staffing plans and relief factor calculations ensure adequate coverage for holidays, weekends, vacation and sick days, emergencies, inclement weather, strikes, civil disturbances, building renovations, expansion activities, or National and State Emergencies, and any other extenuating circumstances that may arise. We use part-time and per diem personnel to provide coverage for scheduled absences and to supplement any full-time staffing needs.

Wellpath maintains a PRN (per diem) pool to ensure backfill and relief coverage is available when needed. PRN pool employees are staff members who are committed to several shifts per month and who are open to working when full-time staff members are absent. Our PRN staff complete orientation and ongoing training consistent with our full-time team members to ensure they are capable and ready to provide continuity of services. We determine the number of PRN employees on the requirement that they work a sufficient number of shifts to be familiar with the current policies and procedures.

### **Travel Nurse Program**

Wellpath has established a Travel Nurse Program to provide coverage for vacancies, reduce overtime hours, and avoid the use of agency nurses. Travel nurses are Wellpath-employed RNs and LPNs who travel to required sites to provide coverage and are available to work multiple shifts and weekends. Wellpath travel nurses obtain licensure in the states that are not compact. They are thoroughly screened based on their clinical skills assessment, knowledge of Wellpath policies and procedures and our Care Management system, and their level of computer literacy.



## Staffing Reports

Wellpath will continue to track and report to Lassen County all staff hours worked, as well as hours not provided. We realize the importance of delivering what we promise, especially regarding on-site staffing, and we work to keep these costs as low as possible.

Wellpath will continue to provide monthly statistical reports showing staffing fill rates. Each month, we provide accounting of actual days/hours worked by the entire medical staff in the form of an FTE report to demonstrate compliance with the contracted staffing plan, or exceptions and a report of steps taken to prevent them in the future.

Our FTE reports are compiled by pay period to provide true transparency and allow for auditing down to the individual and shift. Because these reports are automatic, all historical reports can be searched, queried, and drilled down in mere moments. Our automated FTE reporting system allows for **100% auditable reporting** of contract versus worked staffing reports.

## Sample FTE Report

Staffing Report - Position Level (FTE)														
For Period: 05/06/2017 - 05/27/2017														
* = Backfill Position														
Position	#	Contract Totals			Productive Hours					Non-Productive Hours				Total FTE
		Actual FTE	Contract FTE	Variance	Regatta Hourly	Overnight Hourly	Building Hourly	Total Productive	Vacation, Sick, & PTO	Training	Other	Total Non-Productive		
Administrative Assistant Clinical Site		1.841	1.000	-0.841	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	1.841	
Certified Medical Assistant	*	8.438	10.000	-1.562	7.325	8.333	0.000	0.000	8.438	0.543	0.000	0.000	0.543	9.125
Dental Assistant	*	8.881	1.100	-0.219	0.881	0.000	0.000	0.881	0.372	0.253	0.000	0.625	1.000	
Dentist	*	9.944	1.000	-0.944	0.933	0.000	0.000	0.933	0.100	0.000	0.000	0.100	1.033	
Dentist Hourly		8.300	8.300	0.000	8.300	0.000	0.000	8.300	0.000	0.000	0.000	0.000	8.300	
Director of Nursing		1.119	1.000	-0.119	0.999	0.000	0.000	0.999	0.120	0.000	0.000	0.120	1.119	
Health Services Administrator		1.072	1.000	-0.072	0.992	0.000	0.000	0.992	0.000	0.000	0.000	0.000	1.072	
Licensed Clinical Psychologist		0.300	2.000	-1.000	0.300	0.000	0.000	0.300	0.000	0.000	0.000	0.000	0.300	
LPN	*	22.776	82.100	-59.324	11.428	1.847	0.000	0.000	12.776	1.878	0.000	0.000	1.878	24.654
MD1400 0974 Job Code NOT in the		0.817	0.000	0.817	0.817	0.000	0.000	0.817	0.000	0.000	0.000	0.000	0.817	
Medical Director	*	1.334	1.100	-0.234	0.863	0.000	0.000	0.863	0.000	0.000	0.000	0.000	1.334	
Medical Records Clerk		4.361	5.000	-0.639	4.443	0.000	0.000	4.443	0.372	0.000	0.000	0.372	4.815	
Mental Health ARNP	*	0.164	3.100	-2.936	0.164	0.000	0.000	0.164	0.000	0.000	0.000	0.000	0.164	
Mental Health Director	*	1.069	1.000	-0.069	1.000	0.000	0.000	1.000	0.000	0.000	0.000	0.000	1.069	
Mental Health Professional	*	8.887	7.000	-1.887	6.422	0.000	0.000	6.422	0.122	0.000	0.000	0.122	8.544	
Nurse Educator	*	1.828	1.000	-0.828	0.998	0.000	0.000	0.998	0.000	0.000	0.000	0.000	1.828	
Nurse Practitioner	*	2.878	1.700	-1.178	1.854	0.000	0.000	1.854	0.000	0.000	0.000	0.000	2.878	
Nurse Practitioner Hourly		0.000	0.000	-0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Pharmacy Technician	*	5.741	5.000	-0.741	5.444	0.000	0.000	5.444	0.100	0.000	0.000	0.100	5.544	
Physician Hourly		0.300	1.100	-0.800	0.300	0.000	0.000	0.300	0.000	0.000	0.000	0.000	0.300	
Psychiatrist		0.300	0.700	-0.400	0.300	0.000	0.000	0.300	0.000	0.000	0.000	0.000	0.300	
Psychiatrist Hourly	*	0.363	0.400	-0.037	0.363	0.000	0.000	0.363	0.000	0.000	0.000	0.000	0.363	
Psychologist Hourly		0.300	1.000	-0.700	0.300	0.000	0.000	0.300	0.000	0.000	0.000	0.000	0.300	
Quality Improvement Coordinator	*	0.752	1.000	-0.248	0.752	0.000	0.000	0.752	0.132	0.000	0.000	0.132	0.884	
RN	*	20.060	11.900	-8.160	18.883	1.183	0.000	20.066	0.134	0.000	0.000	0.134	20.200	
RN Charge Nurse	*	0.798	0.000	0.798	0.798	0.000	0.000	0.798	0.000	0.000	0.000	0.000	0.798	
RN2500 0973 Job Code NOT in the		0.798	0.000	0.798	0.798	0.000	0.000	0.798	0.000	0.000	0.000	0.000	0.798	
X-ray & Lab Technician	*	1.000	1.000	0.000	0.998	0.000	0.000	0.998	0.000	0.000	0.000	0.000	1.000	
Grand Total		88.344	119.000	-30.656	83.344	8.982	0.000	92.326	3.721	0.000	0.000	3.721	96.047	
* = Backfill Position														

## III.1.k. PREA Compliant

Wellpath complies with the Prison Rape Elimination Act of 2003 (PREA) at all of our client sites. Inmates who are victims of any form of sexual violence will be treated according to PREA and Lassen County Jail and Juvenile Hall policy. Wellpath maintains a “zero tolerance” policy regarding rape or sexual abuse of inmates, and we have an established policy for responding to allegations of such acts. This policy requires prompt and appropriate health intervention in the event of a sexual assault in an effort to minimize medical and psychological trauma.





Wellpath will ensure that all staff members are properly educated on PREA standards and procedures. All Wellpath employees receive initial and annual training on the purpose and requirements of PREA. The training explains the issues surrounding prison sexual assault, the importance of reporting incidents, and the level of involvement from other government agencies. Following the training, employees are tested on their knowledge of PREA and certified based on demonstrated competency.

Dr. John Newby, Wellpath Regional Vice President for the Maine Department of Corrections, is a PREA Certified Auditor for the Bureau of Justice Assistance, giving us unique insight into PREA standards.

### III.2. Program Support

Wellpath has been providing program support for Lassen County for the last four years. We have also had over 35 years' experience providing comprehensive management of correctional health care programs throughout California. Our medical program for Lassen County is supported by Regional Director of Operations, James Roemmich, and Regional Vice President of Operations, Tom Dolan. For additional information regarding Regional Management and support, please see section [II.1.d. Structure of National or Local Supervision](#).

Our program for Lassen County is supported by our Home Office in Nashville, Tennessee and our California office in San Diego.. Our Home Office support includes a staff of Human Resource professionals to guide all recruiting and hiring, as well as Leadership Development and Clinical Education teams to train new and retained staff members. Our Finance and Accounting teams will continue to provide regular, thorough reporting. Our Information Technology department will continue to ensure that all technology meets your needs and requires minimal resources.

In addition to the proposed on-site staff, and the Wellpath Executive and Regional Management Teams, the Lassen County medical program is also supported by the following Home Office personnel:

Wellpath Home Office Resources	
<b>HR Manager</b>	615-324-5706
Stephanie Popp	SPopp@wellpath.us
<b>24/7 HR Support Line</b>	866-673-6176
<b>Employee Benefits</b>	615-324-5709
Tanya Blake	TBlake@wellpath.us
<b>Employee Relations</b>	615-324-5722
Joy Arsenaault	JArsenaault@wellpath.us
<b>Physician/Provider Recruiter</b>	954-354-8772
Mary Wyatt	MaWyatt@Wellpath.us
<b>Nurse Recruiter</b>	TLamb@wellpath.us
Tammy Lamb	615-870-2580
<b>IT &amp; Network Development Support</b>	615-844-5400
Richard Lee	RLee@wellpath.us
<b>24/7 IT Support Line, Helpdesk</b>	866-631-0051
<b>Legal Counsel</b>	615-844-5517
Lori Schwartzmiller	LSchwartzmiller@wellpath.us
<b>Designated Case Manager</b>	615-708-9273
Michelle Wray	MiWray@wellpath.us



### III.3. Third Party Billing

Wellpath will continue to assist Lassen County in deferring all eligible inpatient hospitalization expenses when possible. We are dedicated to providing medically necessary health care services while also being proper stewards of limited taxpayer resources. As part of this focus, we properly account for all adjustments and reimbursements from applicable sources, and ensure that hospitals are aware of any third-party payer avenues. We also obtain prior authorizations and complete co-pay arrangements with hospitals and providers.

Wellpath staff ask every inmate at intake if they have insurance; if the inmate has private insurance or other payment options available, Wellpath will notify the hospital of the appropriate agency to invoice (the inmate is responsible for any co-pays or deductibles). Private insurance carriers have financial responsibility when an inmate leaves the correctional facility for either outpatient or inpatient services, provided that the individual's insurance premium is paid and current. Such coverage typically includes services provided by physicians, hospitals, or other freestanding facilities.

When an inmate has private insurance, Wellpath works with the service provider to coordinate private insurance. Providers that obtain authorization from the insurer are responsible for billing the insurance carrier. When directed by Lassen County, we will assist in the completion of inmate co-pay arrangements with service providers. If an inmate is uninsured, we will work with Lassen County to identify a willing service provider and negotiate rates.

Our Care Management system contains information on payment responsibility for inpatient treatment costs. The system interfaces with our claims system, so if such invoices are inadvertently sent to Wellpath for payment, we will contact the off-site provider and advise them as to the appropriate location to resubmit their invoice for payment.

### Medicaid Enrollment

Wellpath can assist Lassen County, if desired by the County, by identifying patients who satisfy the current Medi-Cal eligibility requirements and enrolling them accordingly. The County would be required to enroll in the Medi-Cal Adult County Inmate Program (MCIP) if you wish to participate. Wellpath currently works with more than a dozen counties that are participating in MCIP, including all California partner counties with inmate ADPs of at least 1,000. We have developed the processes and procedures to support our county partners in the administration of this program and subsequent reconciliation and rebate of savings to the counties.

### III.4. Cost Containment Program

In all programs we design and operate, our objective is to uncover all possible areas of economy without sacrificing quality. We demonstrate value through our cost saving initiatives, timely reporting, and overall improved quality of people, programs, and processes. By applying our Savings through Value-Added Efficiency (SAVE) initiative, we are continually reviewing "best practices" at all of our sites to share success with all of our clients.





Three areas of significant cost in any program are goods and services, staffing, and off-site trips for care. Wellpath generates efficiencies and savings in these areas through contract negotiations with providers, staffing level management, and utilization management. We are highly confident that we can continue to work with Lassen County to further reduce and contain costs for both on- and off-site services, based on our track record of cost savings success at our client sites.

Our passion for doing things the right way has led to phenomenal success not only in the quality of our care programs, but also in cost containment for our clients. By reviewing the specifics of each client's inmate health care needs and maximizing facility and staff capabilities, we create efficiencies and cost savings. We form successful partnerships that help our clients contain costs and improve the quality of health care in correctional facilities throughout the country. We have provided just a few examples of our proven success for your consideration.

### Wellpath Cost Containment Success Stories

**Wayne County (MI)** During the first year of our management fee contract in Wayne County (Detroit), **we saved the County \$1.7 million dollars in total direct expenses** compared to their budgeted costs. One significant area where we contained costs was in off-site expenses, saving the County 15% off its off-site budget. In 2018, we saved Wayne County \$1.3 million in budgeted operating expenses.

**Mecklenburg County Sheriff's Office (NC)** During the course of our partnership with the Mecklenburg County Sheriff's Office, we have reviewed and updated staffing based on facility openings and closings, security input, decreased ADP, and the development of new programs. We estimate that **this has saved our client in excess of \$1.5 million dollars** during the past four years. We also implemented a successful telepsychiatry program and an on-site infirmary that has created a **significant reduction in hospital days**.

**Durham County Health Dept. (NC)** We helped stabilize health care costs in Durham County by reducing off-site trips and thereby overall program costs. We brought more services on site by expanding nursing services and opening an infirmary, significantly decreasing off-site trips and hospital stays. We were also able to **improve by 50% the discount the County had with the local hospital provider**. Overall, we have reduced the County's per inmate per day costs below what they were paying previously, and they have stayed that way under our management.

**Lexington County Sheriff's Dept. (SC)** Upon transition of services in Lexington County, we implemented an ongoing quality improvement study regarding off-site emergency transports and evaluated each case for efficacy of care provided on site. **In just three months, we dramatically decreased the number of emergency trips** while ensuring total accountability regarding efficacy of care.

**Davidson County, Sheriff's Office (TN)** With our Care Management system in place, the Davidson County Sheriff's Office saw their **off-site trips cut in half** within the first six months of our contract implementation, resulting not only in reduced hospital and community provider costs, but also in reduced transportation costs and officer overtime.



### Wellpath Cost Containment Success Stories

#### Oakland County Sheriff's Office (MI)

During the first year of our Management Fee contract in Oakland County, ***we saved the County over \$1 million in total direct expenses*** compared to their budgeted costs. One significant area of savings was off-site expenses, where we saved the County 40% of its off-site budget. We also saved the County 25% of its Direct Expenses budget during the first year.

### III.5. Managent Information and Reporting

On-site statistical reporting is based on a variety of source documents and aggregated daily. In some locations, spreadsheet software programs are utilized to aggregate monthly data and generate year-to-date totals.

Monthly statistical workload reports are completed by the end of the first week of the following month. Reports are from county to county and allow for comparative data. CFMG will provide additional categories of information based on county requests in a local use section.

### III.6. Policy and Procedure

Our Policies and Procedures Manual adheres to all applicable federal, state, and local guidelines, including Title 15. All on-site health services staff must review the manual as a part of the orientation process and annually thereafter. All policy and procedure changes or revisions will continue to be communicated to all on-site staff at the time of the revision in the required format.

### III.7. Quality Assurance Programs

Through the quality assurance program, Wellpath evaluates the quality, effectiveness and consistency of services. Our Continuous Quality Improvement process complies with CMA-IMQ guidelines and Title 15 standards. Our quarterly medical peer review process consists of regularly scheduled internal auditing, weekly service monitoring, documented reporting of all findings, development and implementation of correction action plans and re-evaluation.

Our approach to Continuous Quality Improvement (CQI) is best described in the Four Tenets of Continuous Quality Improvement:

- Most problems are found in processes, not people; CQI does not seek to blame but rather to improve services.
- Unintended variation in process = unwanted variation in outcomes; the goal is to reduce or eliminate unwanted variation
- It is possible to achieve continual improvement through small, incremental changes using the scientific method-finding the root cause.
- Continuous quality improvement is most effective when it becomes a natural part of the way everyday work is done. It is done as part of the work, not in addition to the work



The CQI program focuses on medical outcomes or interventions that have been shown through evidence-based medicine to favorably change clinical outcomes.



## ***Quality Assurance Committee Meetings***

Wellpath holds quarterly meetings of a Quality Assurance Committee in each of its County partner sites, including in Lassen County. These are different from traditional quality or MAC meetings in that we typically invite and seek input from key members of the local health and medical community, including public health, community mental health, and other key stakeholders. In Lassen County, we have had participation by many representatives of the Lassen County community, including, for example, the STD Clinic, Foster Care, and Rady Children's Wellness Team. This assembly of disciplines is unique to Wellpath, and fosters trust and transparency with the key stakeholders in the community.

The Quality Assurance Committee comprises a multi-disciplinary forum for addressing the delivery of on-site services, operational issues which may impact custody administration as well as inpatient, public health and mental health services. The Committee establishes process for identifying inappropriateness, deficiencies and/or problems in health services delivery; developing a corrective action plan and scheduled follow-up evaluation and reporting.

The Quality Assurance agenda includes, but is not limited to, reports by medical staff, community programs, public health, dental and pharmacy services; review of the incidence of infectious disease cases; any reports regarding concerns from Lassen County; as well as internal audit result reports and weekly monitoring activities. Wellpath will document all committee deliberations and findings in the meeting minutes, which are provided to all committee members.

Wellpath also participates in external reviews, inspections, and audits as requested. We will provide written response to any findings or inquiries resulting from the County's audit processes and promptly develop and implement corrective actions as indicated. We will cooperate fully with all audit inspection activities initiated by the County.

The Medical Director will ensure that any corrective action recommended by the Committee is implemented and completed within 30 days of the report making such recommendations, unless there are extenuating circumstances preventing implementation and completion within such timeframe in which case it shall occur as soon as reasonably practical.

## ***Wellpath Continuous Quality Improvement Program***

Wellpath continually focuses on maintaining a high quality of care for our patients. We use proven performance monitoring techniques at the Jail and Juvenile Hall, including our Continuous Quality Improvement Program (CQIP), which includes audit and medical chart review procedures to ensure compliance with contract requirements, as well as NCCHC, ACA, and Title 15 standards. We also conduct regular Medical Audit Committee (MAC) meetings to evaluate the Lassen County medical program.

Wellpath uses established policies and procedures and our data-driven CQIP to ensure the continued quality of the Lassen County medical program. The goal of the CQIP, which operates under the authority of our Chief Clinical Officer, Dr. Carl Keldie, is to ensure systems and programs guarantee that our patients receive quality health care services. The CQIP ensures that clinical care delivery at the Jail and Juvenile Hall is conducted in accordance with our high expectations, as well as NCCHC, ACA, and Title 15 standards.



Wellpath has developed a site-specific Quality Improvement (QI) plan based on the scope of care provided at the Jail and Juvenile Hall. The QI plan addresses health care services provided both on and off site for quality, appropriateness, and continuity. We use the QI plan to review and define the scope of care provided within the system, as well as the QI review process and meeting format.

### Quality Improvement Committee

A multidisciplinary Quality Improvement Committee (QIC) directs all Quality Improvement activities. The QIC is led by Dr. Meadows and includes Ms. Blacka, the site's designated mental health representative, site Safety Coordinator, and appropriate Lassen County representative(s). The QIC is responsible for performing monitoring activities, discussing the results, and implementing corrective actions as indicated.

The QIC meets quarterly to review significant issues and changes and provide feedback for the purpose of improving processes or correcting any deficiencies or improving processes. Wellpath marks all CQIP activity records as confidential; discussions, data collection, meeting minutes, problem monitoring, peer review, and information collected as a result of the CQIP are not for duplication or outside review.

### Scope of CQIP

Wellpath conducts CQI studies to ensure that all services at the Jail and Juvenile Hall meet established minimum thresholds. We are responsible for monitoring relevant areas for quality improvement, including accreditations, credentialing, environmental inspections, emergency drills, nursing, intake, medication management, special housing, and ancillary services.

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 Jail and Juvenile Hall.

Wellpath completes monthly CQI screens as outlined in the CQI Calendar, plus at least one ad hoc screen per 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 Hospital
- Prenatal and Postpartum Care – HEDIS and Outcome Study
- Asthma Outcome Study

Please see the following sample CQI Calendar, with monthly CQI screens broken out by responsible party.



Sample CQI Calendar			
Month	Nursing	Site Medical Director	Mental Health
<b>Jan.</b>	1. Continuity of Care 2. Pregnancy Care		
<b>Feb.</b>	1. Site-specific Study 2. CQI Meeting	1. Scheduled & Unscheduled Off-site Care	1. Suicide Prevention
<b>March</b>	1. Medication Administration 2. Copy of Narcotics Logs		
<b>April</b>	1. Alcohol/Benzodiazepine Withdrawal 2. Opiate Withdrawal		1. Segregation
<b>May</b>	1. CQI Meeting 2. Patient Safety (review Q1)	1. Physician Chart Review	1. Suicide Prevention
<b>June</b>	1. Emergency Services 2. Sick Call		
<b>July</b>	1. Receiving Screen & Med Verification	1. HIV	1. Psychiatric Services
<b>Aug.</b>	1. Site-specific Study 2. CQI Meeting		
<b>Sept.</b>	1. Ancillary Services 2. Dental Care 3. Dietary Services		1. Suicide Prevention
<b>Oct.</b>	1. Alcohol/Benzodiazepine Withdrawal 2. Diabetes-HEDIS		1. MH Special Needs & Treatment Planning
<b>Nov.</b>	1. CQI Meeting 2. Patient Safety (review Q2 & Q3)	1. Infirmary Care	
<b>Dec.</b>	1. Annual Review of CQI Program		1. Suicide Prevention



## High-Risk Items

The CQIP addresses many forms of risk management, including clinical and environmental risk management tools that work to identify and reduce variability, as well as reducing liability when adverse events occur. The QIC addresses the following risk management items:

- **Critical Clinical Event (CCE) Reviews** – The QIC monitors, reviews, and reports on the health care staff's response to critical incidents. The committee uses the root cause analysis problem solving methodology to review the CCE.
- **Emergency Drill Reviews** – The QIC monitors, reviews, and reports on the health care staff's response to emergency drills.
- **Environmental Inspection Reports** – Wellpath participates in monthly facility environmental inspections to ensure that inmates/wards live, work, recreate, and eat in a safe and healthy environment.
- **Resolution Tracking** – The QIC tracks deficiencies identified during routine environmental inspections through resolution.
- **Utilization Management** – Wellpath monitors the provision of care to ensure that medically necessary health care services are provided in the most appropriate setting.
- **Grievances** – The Wellpath grievance process is consistent with national standards and internal client policies. The QIC reviews and categorizes grievances to identify potential issues and determine if patterns exist or develop. Patient satisfaction surveys are administered on topics relevant to the inmate population.
- **Pharmacy** – Wellpath ensures quality pharmacy programming through regularly scheduled on-site inspections performed by a consulting state-licensed pharmacist. We document inspection reports and maintain them on file, and the consulting pharmacist provides a summary of these discussions and actions to the QIC.
- **Pharmacy Reports** – Wellpath uses pharmacy reports to identify outliers and trends, then evaluate and address all outliers. The Regional Medical Director reviews pharmacy utilization data on a regular basis.

## Medical Audit Committee

Wellpath has established a Medical Audit Committee (MAC) to oversee all health care functions at the Jail and Juvenile Hall. The MAC meets on a monthly basis with distributed agendas. The purpose of the MAC meetings is to evaluate the medical program, ensuring that high-quality medical, dental, and mental health services are available to the entire inmate/ward population.

Discussions include monthly health services statistics by category of care, current status of the medical program, costs of services, coordination between security and health services, and identified issues and program needs. The MAC also reviews and categorizes grievances to identify potential issues and to determine whether patterns exist or develop. Wellpath will continue to hold MAC meetings in coordination with facility administration to discuss health care services. Meeting minutes are documented, distributed, and maintained for reference.





Wellpath also provides monthly and quarterly reports regarding the clinical operation of the Lassen County medical program, in accordance with applicable requirements of the NCCHC, ACA, and Title 15. We regularly confer with facility administration regarding any issues deemed appropriate, including existing procedures and any proposed changes to procedure.

The MAC typically includes:

- HSA – Jessica Blacka
- Medical Director – Hal Meadows, MD
- Psychiatrist – Michael Salib, MD
- Designated Lassen County representative(s)

### III.8. Other Title 15 Requirements

Our medical program and procedures for Lassen County comply with Title 15 of the California Code of Regulations and will meet California Medical Association's Accreditation Standards for adult detention. Wellpath has successfully achieved and maintained CMA/IMQ accreditation in more California correctional facilities than all other providers (private or governmental) combined.

### III.9. Transition Planning

Wellpath has provided comprehensive health care services for Lassen County for more than four years, giving us a unique understanding of the scope of services and first-hand knowledge of what it takes to run a successful medical program inside the Jail and the Juvenile Hall. Extending our partnership ensures continuity of care for your inmate and juvenile populations, and there will be no change in the high-quality service and support you have come to expect from us.

Wellpath guarantees our ability to deliver the required services beginning no later than July 1, 2019. As your incumbent provider, we are the *only* bidder who can guarantee that services will be *fully operational* immediately following contract award. **Choosing Wellpath as your continued partner guarantees a seamless transition to the new contract.**

Because Wellpath is your current medical provider, there will be no disruption of services at the Jail and the Juvenile Hall due to transition activities. Operations will continue as normal without interruption. A new contract with Wellpath will eliminate the disruption of transitioning to a new provider, thereby eliminating the inevitable challenges that any new provider would experience. While any other company will need time to recruit and hire new staff, implement new processes, and forge new relationships with community hospitals and providers, **Wellpath already has all of these crucial items in place.** Additionally, there will be no start-up costs passed on to Lassen County with Wellpath as your continued partner.

Change under any circumstance is a challenge, and in this case, it is unnecessary. You already have the right partner in place, and we look forward to extending our well-established partnership. Although a full transition of services will not be necessary with Wellpath as your continued provider, we have provided the following *sample* transition timeline to be compliant with the RFP.



Sample Transition Timeline (90 days)	
Date	Activity
<b>Day 1 (Contract Award)</b>	<ul style="list-style-type: none"> <li>Wellpath notified of contract award</li> </ul>
<b>Week 1</b>	<ul style="list-style-type: none"> <li>Wellpath on site to meet with facility administration and current health care staff</li> <li>Wellpath begins recruiting current health care staff</li> </ul>
<b>Weeks 2-4</b>	<ul style="list-style-type: none"> <li>Issue first implementation plan with all items to be completed, expected due dates, and person(s) responsible; this plan is a working document and will be provided weekly to appropriate facility staff</li> <li>Begin development of site-specific Policies and Procedures manual</li> <li>Human Resources will process all staff paperwork</li> </ul>
<b>Weeks 4-6</b>	<ul style="list-style-type: none"> <li>Operations team will have finalized travel schedules and will begin creating all binders and training materials</li> <li>Begin recruiting process for any new positions or expected openings</li> <li>Network Development will solidify all agreements with vendors and outside providers; this list will include medical waste, mobile X-ray, lab services, etc.</li> <li>IT ensures connectivity; time clocks, computers, printers, and copiers are ordered</li> <li>Offer letters will be delivered</li> <li>Any declination letters will be delivered in person and in private; this list will be discussed with facility staff prior to ensure no issues</li> </ul>
<b>Weeks 6-8</b>	<ul style="list-style-type: none"> <li>Orientation schedule will be posted and sign-up will begin</li> <li>Updated implementation plan will be provided to facility staff, many items will be marked as complete, and travel schedule for Wellpath Senior Management Team will be provided</li> </ul>
<b>Weeks 9-12</b>	<ul style="list-style-type: none"> <li>Work schedule will be completed with any potential openings identified</li> <li>In-person benefit enrollment sessions (BENEFITS BEGIN DAY ONE)</li> <li>Clinical team will review all offenders with scheduled off-site appointments, and will review all scheduled chronic care clinics</li> <li>All pharmacy orders reviewed to ensure continuity at start-up and accuracy of MARs</li> <li>Multiple people on site to ensure a smooth start-up and begin laying out specific responsibilities for all employees on all shifts; Wellpath start-up team mobilizes</li> <li>Orientation will occur for all employees, covering Wellpath policies, culture, and expectations; orientation will occur outside of work schedule and all staff will be paid for these hours on first Wellpath paycheck; orientation is conducted by members of Senior Management and any facility staff members are welcome to attend</li> <li>Vendor orientation will occur just prior to or during the first few days for lab services, pharmacy, etc.</li> </ul>
<b>Contract Start</b>	<ul style="list-style-type: none"> <li>Wellpath takes over operations and is on site at 12:00 a.m.</li> <li>Computers, copiers, lab equipment, pharmacy carts, etc. are all delivered and inventoried</li> </ul>
<b>Month 1 of Contract</b>	<ul style="list-style-type: none"> <li>Monthly reporting begins</li> <li>Process improvements are identified</li> </ul>





Sample Transition Timeline (90 days)	
Date	Activity
Month 2 of Contract	<ul style="list-style-type: none"><li>• Process improvements are implemented</li><li>• CQIP meetings begin</li><li>• Monthly Infection Control meetings begin</li><li>• Policies and Procedures are developed and approved</li></ul>

### III.10. Exceptions

Wellpath acknowledges each of the terms and conditions listed in the RFP and will continue to meet or exceed the functional and technical requirements specified therein. We respectfully request the opportunity to discuss the following during contract negotiations:

- **RFP p. 13, section 8; p. 18, section 8; and p. 11, Transportation:** Wellpath respectfully takes exception and requests that the off-site exposure be limited to \$10,000 per off-site episode and/or to negotiate the terms in more detail. Wellpath also requests that the emergency helicopter transportation of up to three times per year be limited to the same off-site episode cap of \$10,000.
- **RFP p. 33, Attachment III, section 5. Ownership:** Wellpath respectfully takes exception to section 5 to the extent this provision would jeopardize the ownership or protected status of any of Wellpath's trade secret, proprietary, or otherwise confidential information.



## IV. SERVICES TO BE PROVIDED

Wellpath will continue to provide comprehensive health care services that meet or exceed the needs and operational requirements of Lassen County, in compliance with NCCHC Accreditation Standards for detention facilities, as well as Title 15 and Title 24 of the California Code of Regulations, California Medical Association's Accreditation Standards for Adult and Juvenile Detention Facilities. We will continue to perform our obligations hereunder in compliance with all applicable local, state, or federal laws, rules, regulations, and orders.

Wellpath will continue to provide all required services, including but not limited to:

- Receiving and Screening of Persons – discussed in sections [IV\(A\).1](#) and [IV\(B\).1](#)
- Health Inventory and Communicable Disease Screening – discussed in sections [IV\(A\).2](#) and [IV\(B\).2](#)
- Communicable Disease Testing (P.C. 7500) – discussed in sections [IV\(A\).3](#) and [IV\(B\).3](#)
- Daily Triage – discussed in sections [IV\(A\).4](#) and [IV\(B\).4](#)
- Sick Call – discussed in sections [IV\(A\).5](#) and [IV\(B\).5](#)
- Emergency Services – discussed in sections [IV\(A\).6](#) and [IV\(B\).6](#)
- Detoxification – discussed in sections [IV\(A\).7](#) and [IV\(B\).7](#)
- Off-Site Services – discussed in sections [IV\(A\).8](#) and [IV\(B\).8](#)
- Specialty Care and Ancillary Services – discussed in sections [IV\(A\).9](#) and [IV\(B\).9](#)
- Dental Services – discussed in sections [IV\(A\).10](#) and [IV\(B\).10](#)
- Vision Services – discussed in sections [IV\(A\).11](#) and [IV\(B\).11](#)
- Psychiatric Services – discussed in sections [IV\(A\).12](#) and [IV\(B\).12](#)
- Pre-placement Physical Examinations – discussed in sections [IV\(A\).16](#) and [IV\(B\).13](#)
- Management of Pharmaceuticals and Distribution of Medications – discussed in sections [IV\(A\).13](#) and [IV\(B\).14](#)
- Medical Records – discussed in sections [IV\(A\).14](#) and [IV\(B\).15](#)
- Medical Diets – discussed in sections [IV\(A\).15](#) and [IV\(B\).16](#)
- Policy and Procedure – discussed in sections [II.5.a](#) and [III.6](#)
- Quality Assurance Programs – discussed in section [III.7](#)
- Other California Code of Regulations (CCR) Title 15 Requirements – discussed in section [III.8](#)
- Transportation – discussed in this section
- Equipment, Furnishings, and Supplies – discussed in this section
- Responding to Complaints and Inquiries – discussed in this section
- Officer Testing – discussed in this section

### ***Emergency Response and First Aid***

Wellpath will provide emergency medical treatment and first aid to stabilize any staff, visitors, employees, or subcontractors of the detention facilities who become ill or injured and require emergency care while on the premises. Once the individual's condition is stabilized, he or she will be referred to a personal physician or to a local hospital. Wellpath staff will document any services provided.



## Officer Testing and Training

Wellpath will continue to provide Hepatitis B and TB testing for County staff working at the correctional institutions, to include the required labor, materials, and documentation of results. We will continue to coordinate scheduling in conjunction with the County, who will maintain administrative record keeping.

Wellpath will continue to provide up to six hours of annual training for custody staff at the Jail concerning various health care issues in the facilities, to be scheduled at mutual convenience. Wellpath will continue to provide at least six hours of annual training to juvenile custody staff concerning mental illness and substance abuse (to include training surrounding withdrawal symptoms and care), safe medication delivery and documentation techniques, common side effects of medications, and suicide prevention. We will work with the Juvenile Hall Manager to arrange any other training as requested.

## Health Training for Correctional Officers

Wellpath routinely educates custody staff on the importance of recognizing and responding to specific medical and mental health concerns. Custody staff are a vital part of the process for delivering health care to inmates. Because correctional officers are often the first to respond to problems, Wellpath offers training for custody staff on responding to potential emergency situations, handling life-threatening situations, and their responsibility for the early detection of illness and injury.

Wellpath has developed a Health Training for Correctional Officers manual that complies with the requirements of NCCHC Standard J-C-04. [The manual can be offered as a supplement to facility-provided education.](#) It is comprised of 16 training modules addressing the essential information that custody staff must understand when presented with potentially urgent or emergent situations.

Each training module includes a topic-specific slideshow presentation, a curriculum outline for the presenter/trainer, and handouts for custody staff. Wellpath staff present the training topics, which are based on our *7 Minutes to Save* Rapid Response Series and are designed to be presented in a brief amount of time (average 7-15 minutes). Training topics for custody staff include:

- Alcohol & Benzodiazepine Withdrawal
- Altered Mental Status
- Basic First Aid
- Chest Pain
- Diabetes
- Head Trauma
- Health Associated Infections
- Heat Related Illness
- Ingestions
- Opiate Withdrawal
- Recognizing Signs of Mental Illness
- Respiratory Distress
- Rhabdomyolysis
- Seizures
- Serious Medication Reactions
- Suicide Prevention

Wellpath can collaborate with Lassen County to develop additional training topics specific to the Jail and Juvenile Hall as needed. The frequency of training is typically based on accreditation standards and/or facility policy; however, we recommend a minimum of monthly training. Training sessions would be scheduled in coordination with facility administration, and the HSA or designee would maintain documentation of completed training sessions.



## ***Transportation***

Wellpath staff will continue to coordinate with custody staff to arrange emergency transport and ambulance services when needed. Health care staff work cooperatively with custody staff to ensure that transportation services are provided in a timely and safe manner. Wellpath is responsible for emergency ambulance transportation, while the County is responsible for routine transportation to off-site health care services.

## ***Equipment, Furnishings, and Supplies***

Wellpath acknowledges that the County will continue to provide the space, furniture, fixtures, utilities, housekeeping, telephone (excluding toll charges), security, and other similar items necessary for the operation of inmate/ward health services. The County will also provide and maintain photocopy equipment for use by the medical staff. Wellpath staff will continue to follow Lassen County Computer Policies.

Wellpath will maintain responsibility for all other office and operational supplies, forms, instruments, uniforms, tools, and equipment necessary to carry out the services outlined in the RFP and our contract with Lassen County. We have par level ordering guidelines and will order the supplies necessary to ensure the continuation of proper care at the Jail and the Juvenile Hall.

## ***Contaminated Waste Disposal***

Wellpath will also maintain responsibility for disposal of contaminated waste. We will continue to make provisions for the collection, storage, and removal of all infectious waste and sharps containers in accordance with state and federal regulations. Wellpath has a national contract with Stericycle for the disposal of all bio-hazardous and infectious waste.

Biomedical waste disposal at the Jail and the Juvenile Hall is governed by policy and procedure and includes the proper containment, housing, and disposal of waste. Stericycle provides red biohazard bags for waste disposal and biohazard boxes for bundling and disposal. Proper disposal of sharps is controlled through the purchase of sharps disposal containers through the medical supplier.

Pickup frequency is typically based on volume and the space available for housing; the scheduling and frequency of the removal is approved by the facility. Pickup manifest tracking forms are maintained on site by the HSA. Health care staff follow standard precautions to minimize the risk of exposure to blood and body fluids of potentially infected patients.

## ***Responding to Complaints and Inquiries***

Wellpath staff will continue to review, evaluate, and respond to inmate inquiries and parental inquiries for detained minors, as well as writs, complaints, and grievances, in a professional and productive manner, in accordance with established detention policy and procedure. We recognize that our first responsibility is to our patients, to allow them access to care and treatment sufficient to meet their medical needs, and we train and expect our staff to operate efficiently and appropriately while respecting those needs. Our excellent litigation history and our record of reduced grievances are indicative of the exemplary care our team members provide. All Wellpath personnel receive grievance resolution training, which teaches them to address concerns at the point of contact prior to the inmate initiating a grievance.





Wellpath will also continue to submit a monthly report identifying inmate/ward grievances, along with copies of all medical grievance requests and their resolutions, to the facility administration. Wellpath categorizes all grievances received and provides grievance statistics as a part of the monthly health services statistical report, with data including but not limited to:

- Number of inmates with grievances
- Dissatisfied with medical care
- Dissatisfied with dental care
- Dissatisfied with mental health care
- Dissatisfied with staff conduct
- Dissatisfied with delay in health care
- Problems with meds
- Request to be seen

Wellpath will continue to provide written reports and responses to administrative inquiries about incidents, an inmate/ward's medical status or condition, or medical or dental service delivery issues as requested by the County. We acknowledge that our staff may also be required to testify in court concerning writs of habeas corpus filed by inmates.





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## IV(A). JAIL

### IV(A).1. Receiving and Screening of Personnel

Wellpath staff will continue to perform a receiving screening on all inmates upon their arrival at the Jail to ensure that emergent and urgent health needs are met. Wellpath receiving screenings emphasize the identification, referral, and treatment of inmates with acute and chronic health care conditions, including behavioral health disorders, suicide risk, detoxification, and dental issues, as well as inmates who require medication, isolation, or close observation. The receiving screening sets the course for the inmate's medical care throughout their entire stay; early identification of problems using a systematic intake evaluation prevents more serious and costly problems from developing later.

Wellpath understands the importance of maintaining a timely and proper booking and admission screening process to ensure the well-being of all inmates and of the overall facility operations. We ensure adequate staffing to allow for the timely evaluation of intake orders and inmates in need of further evaluation so those with medical and mental health issues can be stabilized as quickly as possible and medications can be initiated. We will continue to allocate properly trained and authorized health care staff to conduct receiving screenings 16 hours a day, 7 days a week, including holidays.

Receiving screenings are conducted in accordance with NCCHC, ACA, and Title 15 standards, as well as Jail operating procedures, and include:

#### Inquiry 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 substance abuse treatment
- Tobacco use
- For women, current or recent pregnancy, birth control use, date of last menstrual cycle, current gynecological problems, and methadone use
- Any current pain
- Notation of personal physician and any medical risks

#### Testing and initial assessments:

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



Visual observation of inmate:

- Abnormal appearance (e.g., sweating, tremors, anxious, 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, passive or timid appearance)

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 medication use
- History of hospitalization and/or outpatient mental health treatment
- Current mental health status

Information sharing and education:

- Explain right to health care and how to access medical, dental, and mental health services during incarceration
- PREA screening and education regarding sexual assault
- Inform the inmate of the grievance process
- Oral health and hygiene education
- Information on how to access medical, dental, and mental health services, provided both verbally and in writing in a language that the inmate understands
- Documentation of informed consent

Verification and referrals:

- Verification of current medications in a timely manner (a clinician may be notified to assess the patient's need for any non-formulary medications, which may be provided for up to 30 days until an expedited physical can occur)
- Verification of medically necessary special diets
- Current health insurance coverage, if any
- Referral for mental health evaluation as indicated
- Referral for emergency, specialty, or dental care as indicated
- Referral for placement/housing, including general population, medical observation, mental health lockdown, suicide watch, etc.
- For inmates with physical handicaps or disabilities, the responsible physician will determine the need for any medical treatment



Wellpath staff notify custody staff of any inmates requiring extraordinary oversight, treatment, or management, or those with critical conditions, including but not limited to:

- Need of emergency room referral
- Urgent need for medication
- Suicidal thoughts or behavior
- Potential for detox/withdrawal
- Diabetes
- Heart conditions
- Seizures
- New or recent injuries
- Mental conditions or personality disorders (potential for violence)
- Any contagious illness or disease that would be considered an immediate threat to the inmate population or custody staff
- Any other issues deemed urgent or emergent

### ***Receiving Screening Guidelines***

Wellpath has established physician-approved Receiving Screening guidelines to guide the assessment, treatment, and referral process of inmates admitted with health care needs. Wellpath nurses follow these guidelines to determine the appropriate intervention based on various conditions presented at intake. Health care staff are trained by the responsible physician or designee in the early recognition of medical or mental health conditions requiring clinical attention. Training includes instructions on completing the Receiving Screening form and when to contact medical staff to determine appropriate disposition of the patient.

### ***Admission Deferrals***

Admission to the Jail is dependent upon clearance for any injuries or medical problems. Health care staff performing the receiving screening may identify inmates whose clinical status suggests a need for immediate health services beyond the scope of care immediately available at the Jail. In such cases, patients are referred immediately for care to a local emergency room or approved hospital. The inmate's subsequent admission to the Jail is predicated on written medical clearance from the hospital.

Most jurisdictions have established a practice of requiring medical clearance from an outside agency when such patients are identified. Reasons for admission deferrals include but are not limited to:

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



Wellpath performs Quality Improvement reviews on all admission deferrals to identify any additional staff training needs, as well as a utilization review on all emergency room and hospital-direct admissions/pre-booking injuries/illnesses, to ensure that inmates return to the Jail as soon as clinically indicated.

### ***Medication Verification***

When it is determined that an inmate received medical or mental health care prior to incarceration, nursing staff attempt to obtain treatment information and verify medications from community providers to facilitate continuity of care. Individuals who report medication use at intake are asked to complete a Release of Information (ROI) form so the medication verification process can begin. Verified medications are reviewed by a prescribing clinician and continued as clinically indicated.

If the medication verified is not considered a formulary medication, the medication order is bridged for up to 30 days to ensure no break in care while allowing time for a clinician to review the clinical necessity of the medication. Given the nature of jails as short-stay facilities, verified medications (whether formulary or not) are typically continued throughout the duration of an individual's placement unless the individual reports side effects, poor response to the regimen, or a different medication is considered more clinically appropriate for the individual's current symptom constellation.

If a non-formulary medication is to be continued after the initial bridge order, the prescribing clinician will request continuation of the medication, to include a brief clinical rationale for the medication, through the Wellpath Non-Formulary Medication Request process, which is described in section **IV(A).13. Management of Pharmaceuticals and Distribution of Medications.**

Medications for life-threatening or serious chronic diseases will not be delayed upon admission. If there is an immediate need to initiate medication, the medication will be obtained from the backup pharmacy.

### **IV(A).2. Health Inventory and Communicable Disease Screening**

Wellpath staff will continue to conduct a comprehensive health appraisal, including a complete medical history and physical examination, for all inmates within 14 days of intake, unless there is a clinically indicated need to conduct the health appraisal sooner. We typically target day 10 for health appraisals to ensure their completion within the 14-day period required by NCCHC standards. This also allows health care staff to identify any medical needs or conditions the inmate may have failed to disclose during the receiving screening, and to initiate timely and appropriate treatment that may avoid a later need for emergent treatment or hospitalization.

A properly trained nurse conducts inmate health appraisals in accordance with local regulations. Prior to performing health appraisals, nurses must complete physical exam training provided or approved by Dr. Meadows or his designee. Nurses must pass a written test and successfully demonstrate an exam for the physician, who will sign off on their competency to complete the task. The training is documented in the nurse's training record and is repeated annually. The physician or mid-level designee reviews, signs, and dates any assessments completed by nursing staff.





Comprehensive health appraisals, which comply with applicable requirements of the NCCHC, ACA, and Title 15, minimally include:

- A review of the receiving screening
- Recording of vital signs, height, and weight
- Immunization history and initiation of any needed immunizations and therapy
- PPD test for tuberculosis (if not previously administered)
- Laboratory and/or diagnostic tests when clinically indicated or judicially mandated
- Vision and hearing screenings
- Physical examination (including breast, rectal, and testicular exams as indicated by the patient's gender, age, and risk factors)
- Pap testing for female inmates as medically indicated
- Dental screening and hygiene education
- Mental health assessment, including suicide potential screening and psychiatric screening
- Review of health history and gathering of any additional data needed to complete the medical, dental, and mental health histories
- Documentation of allergies
- Other tests and examinations as appropriate, required, and indicated (diagnostic panel, urinalysis, EKG, etc.)

The nurse conducting the health appraisal records their findings on the form approved by the facility administrator, which also includes the individual's title and signature, as well as the date and time of the assessment. Wellpath staff also record the number of inmates who refuse physicals, as well as the reasons for refusal.

### ***Communicable Disease Screening***

As part of the receiving screening process, Wellpath staff inquire into any past history of tuberculosis and other communicable diseases. We will continue to administer a Tuberculin Skin Test (TST) as part of the health appraisal. If documentation of a positive test is in the record or if the inmate indicates such, Wellpath staff follow CDC guidelines of annual symptom screening and perform a chest X-ray if symptoms indicate the clinical necessity. The results of TSTs are read and documented within 48-72 hours.

### **Management of Communicable Diseases**

Wellpath will continue to provide communicable disease management services that meet professional standards consistent with NCCHC and Title 15 standards, CDC guidelines, OSHA regulations, and local public health requirements. We have a written infection control policy to promote the creation and maintenance of a safe and healthy environment for the inmates, staff, and visitors of the Jail. The policy includes recommendations from the CDC as they relate to infectious disease diagnosis and treatment. Oversight includes medical care to those with communicable diseases, as well as monitoring and case management of inmates.



The primary drivers of effective infection control policies, procedures, and guidelines include: **Identification, Prevention, Diagnosis, and Treatment**. The Wellpath Infection Control Program aims to effectively control the occurrence and spread of communicable diseases by maintaining compliance with universal precaution procedures. The program ensures the provision of appropriate cleaning and personal protective equipment, and includes training on general sanitation issues and preventing the transmission of blood borne pathogens.

The goals of the Wellpath Infection Control Program are:

- To identify those individuals who are at risk for infectious diseases
- To monitor and report the incidence of infectious diseases among staff and inmates
- To promote a safe and healthy environment through the use of regular inspections, education, communication, and role modeling
- To survey patients from the time of their entry into the facility
- To provide timely, effective treatment when an infectious disease is identified
- To administer vaccinations to minimize the spread of infectious diseases
- To protect the health and safety of staff and inmates by use of appropriate isolation precautions
- To establish effective decontamination techniques for cleaning of medical equipment and contaminated reusable items
- To provide safe means of disposing of biohazardous waste and used needles and sharps
- To implement and use strict Standard Precautions to minimize the risk of exposure to blood and bodily fluids
- To file required reports in a manner that is consistent with local, state, and federal laws and regulations
- To establish and maintain a good working relationship with the Health Department, the community, and the facility in matters that relate to the prevention of infectious diseases
- To train staff during their orientation and on an ongoing basis regarding each facet of the Infection Control Program
- To monitor the effectiveness of the Infection Control Program through ongoing Quality Improvement data collection and statistical reporting

It is our expectation to reach these goals through a commitment to early identification from surveillance of potential and actual occurrences of infectious disease. As part of the receiving screening process, Wellpath staff inquire into any past history of infectious or communicable diseases, and ensure complete clearance for the inmate's assignment to general population. Those at risk for spreading a communicable disease are segregated from the general population.

For specific diseases, Wellpath staff consult UpToDate and CDC guidelines for the latest protocols and coordinate with the Health Department as needed. The Wellpath Clinical Team addresses the control of all infectious diseases. Wellpath provides training and education to health care and custody staff on the latest standard precautions to be utilized when handling inmates with communicable diseases.



## **Communicable Disease Reporting**

Wellpath immediately reports all highly infectious communicable diseases to the Health Department, in accordance with local regulations. We will continue to work with the Health Department concerning communicable disease screening, continuing medical surveillance, case management, reporting, and inmate referral in the community. Ms. Blacka or her designee is responsible for reporting incidents to public health officials; however, all Wellpath staff are trained on the notification process to ensure timely reporting in cases of unexpected absence or scheduled time off.

Wellpath uses our Care Management system to customize a monthly report of all inmates diagnosed with an infectious disease for Lassen County. Data includes each patient's name and identification number, the date of service, the patient's disposition, and the infectious disease diagnosis. All clinic logs and statistical data are stored electronically on the Wellpath intranet. All appointments are scheduled and completed in the Care Management system.

Our on-site health care team closely monitors and promptly transmits to Lassen County, the Health Department, and necessary outside hospitals and health care delivery facilities information regarding the presence or incidence of communicable diseases in a patient that was recently treated or will be treated at their location. Ms. Blacka or her designee is responsible for managing, reporting, and recording these cases and implementing appropriate educational programs to prevent future occurrences of these incidents.

### **IV(A).3. Communicable Disease Testing (P.C. 7500)**

Wellpath staff will continue to collect blood samples from inmates in compliance with Penal Code Section 7500, "et al," as requested by the County Health Officer and with the inmate's consent. Health care staff do not participate in involuntary specimen collection. Public Health will continue to be responsible for pre- and post-counseling services.

### **IV(A).4. Daily Triage**

Wellpath staff will continue to process and address medical complaints on a daily basis. The Wellpath sick call process ensures that inmates have access to medically necessary health care services, and uses a combination of nurses, mid-level providers, and physicians for sick call services as defined within their scope of practice. We will continue to allocate sufficient health care staff for the sick call process to allow all inmates to be seen in a timely manner in accordance with NCCHC, ACA, and Title 15 standards.

During the receiving screening process, Wellpath staff advise all inmates of their right to access care and the process for requesting health care services. Information regarding access to health care is communicated both verbally and in writing in a language the inmate comprehends upon arrival at the Jail. Provisions are made to ensure that non-English speaking inmates understand how to obtain health care. Custody staff can also make referrals if they have concerns for the health status of an inmate.

Inmates have immediate access to health care request forms that meet all standards and guidelines. Qualified nursing personnel triage health care requests at least once daily, seven days a week, including holidays. Following the collection of health care request forms, nursing staff triage requests within 24 hours of receipt.



Sick call requests are assigned a disposition of Routine, Urgent, or Emergent and are addressed within the appropriate timeframe. All medical complaints are recorded, along with a recommended intervention and referral to appropriate health care staff as required.

#### **IV(A).5. Sick Call**

Wellpath will continue to conduct sick call daily for inmates in need of health care, regardless of housing assignment and in accordance with NCCHC, ACA, and Title 15 standards. Inmates have unimpeded access to both emergency and routine care, regardless of their location, custody level, or status, at all times. Inmates in segregation will be brought to the clinic for sick call as required. However, if an inmate is unable to attend a sick call session due to custody status or as a result of physical condition, Wellpath staff will arrange to conduct sick call services at the inmate's cell.

Following the triage of sick call requests, inmates receive a face-to-face consultation at the next scheduled nurse sick call, which takes place seven days per week. Should the need arise outside the scheduled sick call, inmates who require urgent or emergent medical attention are seen on the same day they request such services.

At the time of triage, the nurse initiates referrals for patients in need of consultation with the medical provider. If multiple areas of interest (i.e., medical, dental, and/or mental health) are requested, additional referrals are sent to the area of request. The nurse documents the area of interest on the request form and signs, dates, and times the form.

#### ***Nursing Documentation Pathways***

Wellpath nurses conduct sick call using Nursing Documentation Pathways (NDPs), which represent a standard of care to be provided to patients in a variety of situations. The NDPs were developed by Wellpath physicians to assist nurses with diagnoses and to ensure consistency of care.

The NDPs 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 provide facts and information regarding specific health conditions or complaints and, thereby, facilitate the nurse's ability to draw logical conclusions from observations, then provide appropriate intervention and follow-up for a particular health condition. In its simplest form, a Nursing Documentation Pathway is a decision-tree process for nurses to follow, which also improves ease of training and **maximizes practitioners' time**. All Wellpath nursing staff are trained in the use of the NDPs.

The Wellpath Nursing Documentation Pathways manual for the Jail is subject to approval by facility administration. The manual is reviewed annually by Dr. Meadows or his designee and is updated as required by the Wellpath Nursing Department. As part of the annual review process, the HSA instructs all nursing staff on revised NDPs as applicable.

#### ***Provider Clinics***

Patients referred for provider consultation are seen during the next scheduled provider clinic. Provider clinics are conducted by a physician or mid-level provider and scheduled with a frequency and duration sufficient to meet the health needs of the patient population. A physician or mid-level provider is also available on call 24/7 for emergencies.



During the provider sick call clinic, the physician or mid-level provider assesses the inmate 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.

#### **IV(A).6. Emergency Services**

When medical staff are present at the Jail, they will provide emergency medical services for any person accepted into the custody of Lassen County pursuant to California State law. Correctional health care personnel are trained to respond to emergencies within four minutes. A Wellpath staff member responds to emergencies upon notification by reporting to the area of the emergency with necessary emergency equipment and supplies. By training our nurses in emergency response and offering on-call physician services, we are often able to reduce off-site/ER trips and hospital stays for our clients.

Wellpath staff determine if a patient needs to be transported to a local emergency room for treatment. The patient is stabilized on site, then transferred to an appropriate medical facility if necessary. Wellpath will continue to coordinate with Banner Lassen Medical Center as appropriate in emergency situations, and will coordinate emergency transport and ambulance services with custody staff and SEMSA ambulance services as needed. Wellpath is responsible for the first \$10,000 of every emergency room visit for each inmate sent to the emergency department at the hospital.

On-site health care staff may make emergency off-site referrals based on established guidelines and their professional interpretation of a patient's need. The on-call physician is notified as soon as the situation allows. Dr. Meadows or his designee conducts a retrospective review following an ER referral to ensure that the action was appropriate and to identify any additional staff training needed.

Wellpath will continue to customize monthly reports of emergency room visits, with data including each patient's name and identification number, the date of emergency service, the patient's disposition, and the emergency treatment received.





## ER Trips Report – Care Management System

**ER Trips Report**  
10/5 - 10/6 8:01:31 AM  
Page 1 of 1

Displays all ER Trips between the Start Date and End Date.  
Inmate Type: N=None, S=State, F=Federal, CMP=Inmate Compact, ICE=ICE/INS  
Observation(OBS): \*N=Observation, \*W=Was Observation  
Hospital Name: \*\*ER To Inpatient Conversion

Site Name	Site Department	Name (Last,First)	Prison Number	DOB	Arrest Date	ICE	Reg Inmate On to	Custody Date	Admit Date	Days From Custody	Discharge Date	Discharge Status	Diagnosis
City of Las Vegas	LV Detention Center		8018818	7/5/1979	1979871		10/5/2014	10/4/2014	10/5/2014	1		University Medical Center	Presenting Problem: S45.9 Epilepsy Not Otherwise Specified
Oakland County Detention Centers	Oakland County High Point Det		828188	2/5/1991	1974872		10/6/2014	9/22/2014	10/5/2014	13		Novos Clinic	Presenting Problem: S50.9 Injury of Head Not Otherwise Specified
Marion Co Sheriff's Dept	Marion Co Main Jail (M)		000000683908	7/9/1987	1974982		10/6/2014	10/2/2014	10/5/2014	3		External	Presenting Problem: S44.137 Treatment of Injury Not Otherwise Specified
Marion Co Sheriff's Dept	Marion Co Main Jail (M)		000000644025	1/29/1985	1975000		10/6/2014	10/5/2014	10/5/2014	1		External	Presenting Problem: S44.137 Treatment of Injury Not Otherwise Specified
Oakland County Jail	Oakland County Jail		295131	11/4/1977	1974813		10/6/2014	10/4/2014	10/5/2014	1	10/5/2014	Internal	Presenting Problem: S44.137 Treatment of Injury Not Otherwise Specified
Shelby County Jail	Shelby Correctional S-CO		429216	4/13/1990	1974912		10/6/2014	1/29/2014	10/5/2014	249	10/6/2014	Regional One	Presenting Problem: S25.9 Dental Disorder Not Otherwise Specified
Walsh County	Walsh County DOC		222412	5/7/1994	1974814		10/6/2014	9/18/2014	10/5/2014	17	10/6/2014	Home	Presenting Problem: S78.9 Open Wound of Multiple and Unspecified Sites
Wyandotte Detention Center	Wyandotte County (WOC)		188476	10/5/2014	1974204		10/5/2014	10/5/2014	10/5/2014	0		KU Medical Center	Presenting Problem: S44.9 Injury of Head Not Otherwise Specified
Kentucky Department of Corrections	Kentucky State Penitentiary		748465	5/11/1990	1974829	*	10/6/2014	11/16/2011	10/5/2014	1032	10/6/2014	Regional Hospital La Grange	Presenting Problem: S00.19 Head Trauma Diagnosed Elsewhere
Kentucky Department of Corrections	Kentucky Correctional Institute		261397	7/11/1992	1974740	*	10/6/2014	1/14/2014	10/6/2014	285		U of L	Presenting Problem: V70.9 General Medical Exam Not Otherwise Specified
Kentucky Department of Corrections	Kentucky Correctional Institute		208741	7/9/1984	1974713		10/6/2014	1/15/2014	10/6/2014	207		*** By per Health La Grange	Presenting Problem: V22.2 Pregnant State residents
Pinellas County Department of Corrections	SO Coast Township		713815	12/8/1979	1974952		10/6/2014	5/25/2011	10/5/2014	1230	10/5/2014	Osinger-Strauman	Presenting Problem: S99.01 Head Injury Not Otherwise Specified

### IV(A).7. Sobering

Wellpath staff will continue to assess inmates upon being admitted to and prior to being released from a sobering cell. Wellpath staff check on inmates in sobering cells a minimum of every six hours and any time when requested by custody staff. All prolonged sobering services are performed under medical supervision.

### Medically Supervised Withdrawal Management

Wellpath will continue to provide medically supervised on-site withdrawal management services in accordance with all applicable standards of treatment. When medically indicated, inmates will undergo a complete withdrawal management program, minimizing risk of adverse symptoms and the need for off-site treatment. Wellpath ensures that all health care and custody staff are trained to recognize the signs and symptoms of withdrawal and to take the proper next steps to safely manage patients experiencing these symptoms.

All Wellpath facilities that are eligible under state law have Narcan (naloxone) stocked with their emergency response supplies. Narcan is used in the event of an emergency for at-risk patients or anyone who is suspected of having an opiate/opioid overdose. Specifically, any patient found to be unresponsive with unknown cause, or pulseless or apneic, should be given Narcan early on as part of the resuscitative process. Wellpath nursing staff are trained in Narcan administration and are encouraged and empowered in its use in order to save lives. Since we started using Narcan in 2015, our staff have saved more than 300 patients from overdosing, **including two patients in Lassen County.**



### A Life Saved – Vigilant Wellpath Nurse Administers Narcan

Early on a Friday morning, one of our nurses at the Oakland County, Michigan jail was called to intake to evaluate a newly admitted patient. When the nurse arrived, the patient was extremely sluggish with low blood pressure, heart rate, and respirations. The nurse was able to ascertain that the patient may have ingested multiple substances, including heroin.

Based on the patient's level of consciousness, decreased vital signs, and suspected drug use, the nurse informed custody staff that the patient needed to go to the emergency room. Not wanting to delay life-saving treatment, the nurse administered a dose of Narcan, the antidote to heroin overdose. The patient showed only minimal improvement after the drug was given. Approximately five minutes later, the nurse administered a second dose of Narcan. The patient's vital signs improved dramatically and his level of consciousness improved to the point that he was able to speak with the nurse. When the ambulance arrived, he had improved so much that he was able to walk. ***The recognition of a possible opioid overdose and administration of Narcan by this nurse (following the Wellpath Narcan administration policy) led to a life-saving outcome.***

The Wellpath Narcan administration policy outlines the guidelines for use of Narcan in our facilities. When used in a suspected opioid overdose, as in this case, it can save lives. All Wellpath facilities that are eligible under state law have vials of Narcan in their emergency supplies, along with the appropriate supplies for administration. Whether it is a known or suspected opioid overdose, our nursing staff are trained in Narcan administration and are encouraged and empowered in its use in order to save lives.

The Wellpath Withdrawal Management Program and Policies incorporate the following:

- **Receiving Screening** – Proactive identification of those at risk
- **Observation and Monitoring** – Monitoring and assessment tools utilized to ensure patients receive treatment as indicated and do not progress to a critical state
- **Treatment** – Using American Society of Addiction Medicine (ASAM) national practice guidelines

### Receiving Screening

Many individuals arrive in the correctional setting under the influence of drugs or alcohol. Significant histories of substance abuse increase the possibility that they will experience some degree of withdrawal. Therefore, the Wellpath receiving screening includes questions regarding types of substances used, time of last usage, frequency and amount of usage, length of time using, and side effects experienced when ceasing use in the past. During the receiving screening, Wellpath staff use a standardized form to evaluate all inmates for signs and symptoms of withdrawal, including:

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



Inmates who report alcohol and/or drug dependence or who are 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 – Alcohol (CIWA-Ar) and/or the Clinical Opioid Withdrawal Scale (COWS).

These tools have been researched and shown to be viable methods for assessing the severity of withdrawal symptoms based on observation of the inmate's behavior or the inmate's response to questioning. Wellpath medical personnel also use the CIWA-Ar/COWS tools to determine the responses of our inmates to medications given to ameliorate withdrawal symptoms.

### Observation and Monitoring

Inmates determined to be at risk for alcohol or drug withdrawal undergo withdrawal monitoring. Nursing staff contact the physician/mid-level provider on duty or on call when inmates are identified as high risk for withdrawal. Based on the clinical presentation of the inmate, the provider may recommend placing them in observation.

Inmates experiencing withdrawal from alcohol, opiates, or benzodiazepines are monitored for at least five days or longer if deemed necessary by the provider. Inmates undergoing withdrawal monitoring are assessed by medical personnel three times daily and anytime requested by facility staff. Assessments include CIWA/COWS checks to determine the patient's level of withdrawal.

During each assessment, the inmate undergoes a short mental health screen that assesses current thoughts of suicidality, hopelessness, or recent bad news. A positive answer to any of these questions results in the inmate being placed on suicide watch and the mental health provider being called. Withdrawal can be uncomfortable and is a risk factor for suicides and suicide attempts, so we prefer to take this proactive approach.

The image shows two medical assessment forms. The top form is the 'COWS SCORE SHEET Opiate Withdrawal' and the bottom form is the 'CIWA-Ar SCORE SHEET Alcohol and Benzodiazepine Withdrawal'. Both forms include sections for patient information, vital signs, and a grid for recording scores over time. The CIWA-Ar form also includes a 'Mental Health Screen' section at the bottom.

The image shows a 'Substance Withdrawal - Exam Form'. It includes sections for 'List Types of Withdrawal', 'SUBJECTIVE' (thoughts of self-harm, hopelessness, recent bad news), 'PHYSICAL EXAM' (vital signs, skin, heart, lungs, etc.), and 'ASSESSMENT' (CIWA/COWS scores, physical exam, etc.). It also has a section for 'Mental Health Screen' at the bottom.



## Treatment

The Wellpath physician establishes an individualized treatment plan immediately upon identifying an inmate as being at risk for withdrawal from alcohol or sedative-hypnotics. The treatment plan is based on the physician's assessment of the patient's condition and may include prescribed pharmaceutical therapy, as indicated. Our Senior Regional Medical Director, Dr. Herr, orients clinicians regarding effective management of care based on specific criteria.

Wellpath has established a best practice for determining the medications to be used, the frequency of use, and the starting dose of these medications. This best practice has been translated into an order sheet used by practitioners to manage and treat the symptoms of withdrawal. This document dictates the minimum amount of medication that should be used to treat inmates going through withdrawal, thus allowing for immediate use for most patients. Individual treatment plans are developed for those who do not respond as expected.

## IV(A).8. Off-site Services

Wellpath will continue to provide as many on-site medical services as possible, as described in section [IV\(A\).9. Specialty Care and Ancillary Services](#). Our goal is to limit the number of patients who must be transported off site, while ensuring that inmates receive medically necessary health care services in the most appropriate setting.

When an inmate requires specialty services that cannot be provided on site, Wellpath authorizes, schedules, and coordinates the provision of such services with local providers. Wellpath staff use the Care Management system to initiate referrals for off-site treatment, which are limited to the chief complaint(s) indicated through a referral form and/or medical consultation. Referrals are approved based on appropriateness and necessity.

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

**Patient Eligibility:**

Requesting Provider:

☒ Pre-Sentenced ☐ Sentenced

☒ Pre-Booking ☐ Probable Inmate Violence ☐ Worker's Compensation ☒ Self-Harm  
☒ Pre-Booking ☒ Confirmed Inmate Violence ☒ Invol Financially Liable ☒ Medication  
☐ Other Insurance

**Referral Type:** Select Referral Type: Off Site Services

**Reviewer Type:** Select Reviewer Type:

**Service Details:**

**Treatment Type:**  **Specialty Type:**  **Place of Service:**    
**Related Diagnosis:**   
**Diagnosis:**    
**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:**   
**Other:**   
**Transport To:**





## Submitted Requests View – Care Management System

Service Date	Service Type	Specialty	Patient ID	Name	Status	User
07/23/2018	Outpatient		100118	Lina, Dorotea	Submitted	Johnny, Clea
06/08/2018	Outpatient		100626	Yonhaci, Amy	Submitted	Dean, Rieger
06/04/2018	Outpatient	Psychiatry	100225/10111	Robby, Robby	Submitted	Dean, Rieger
06/04/2018	Outpatient	Neurology	100225/10111	Robby, Robby	Submitted	Dean, Rieger
06/04/2018	Outpatient	General Surgery	100225/10111	Robby, Robby	Submitted	Dean, Rieger
06/04/2018	Outpatient	Transcendental Radiology	100225/10111	Robby, Robby	Submitted	Dean, Rieger
06/04/2018	Outpatient		146238	Nicole, Nicole	Submitted	Dean, Rieger
06/04/2018	Outpatient		146238	Nicole, Nicole	Submitted	Dean, Rieger
06/04/2018	Outpatient		146238	Nicole, Nicole	Submitted	Dean, Rieger
06/04/2018	Outpatient	Path. CP88	1012231	Patric, Patric	Submitted	Dean, Rieger
06/04/2018	Outpatient	Physical Therapy	11187	Patric, Patric	Submitted	Dean, Rieger
06/04/2018	Outpatient		11187	Patric, Patric	Submitted	Dean, Rieger
06/04/2018	Outpatient		11187	Patric, Patric	Submitted	Dean, Rieger

## Evaluation of Medical Necessity

Wellpath has the strongest utilization management program in the industry to manage inmate care. The Wellpath Care Management Program uses evidence-based guidelines to determine medical necessity as part of our approval process. Our Care Management Program is clinically overseen by Medical Director of Care Management, Dr. Donald Rhodes, and is operationally managed by Vice President of Care Management, Pablo Viteri. Dr. Rhodes and the Care Management team will work together with Senior Regional Medical Director, Dr. Herr, and on-site medical personnel to ensure that inmates receive medically necessary health care services in the most appropriate setting.

Following is a summary of the Wellpath Care Management process.

1. When an on-site provider determines that an inmate may need community-based services, the provider uses the Care Management system to document and communicate the Consultation Request.
2. On a daily basis, our Corporate and/or Regional Medical Director will access the Care Management system to review requests and take one of the following actions:
  - Authorize a specific diagnostic or therapeutic modality
  - Recommend an alternative treatment plan
  - Request additional information

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 being made.





3. If it is determined that the requested service is medically necessary, the request is approved and an authorization number is established in the Care Management system, which automatically sends the authorization number to the site and to the Wellpath Claims Department.
4. Once the site receives an authorization number, an appointment can be scheduled within the system. Authorization numbers are only valid for a specific period. Wellpath will communicate service approval to the community provider and will require pre-approval in order to assume financial responsibility for services rendered. We will also verify that all invoiced charges are appropriate. Since the system sends the authorization number to our claims department, they are able to review every invoice to ensure that Lassen County is only billed for the approved services.
5. If an inmate is released from custody prior to a scheduled appointment, Wellpath will notify the community provider that Lassen County is no longer financially responsible, and remove the pending appointment from the system.
6. The site Medical Director will review and address discharge summaries and medical recommendations that the community provider makes.

### ***Appointment Scheduling***

Once the referral is approved, Wellpath staff schedule an appointment through our Care Management system, which allows health care personnel to easily schedule appointments for both on- and off-site specialty services. Appointment scheduling through the Care Management system is a valuable tool for medical staff as they prioritize 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
- Queues show missed appointments (due to security, court appearances, etc.) and allow for rescheduling

Wellpath staff coordinate with custody staff to arrange transportation and security for all off-site specialty care. Inmates are not informed of scheduled appointment dates, times, or the location of outside providers.



## Appointment Scheduling – Care Management System

Scheduling For Referral

Click here to watch the scheduling training videos!

**Create Appointments** Referral #: 3305846

Site Department: Ops Training Ops Correctional Facility

Patient: [Enter Johns PMSB]

Patient's Scheduled Appointments: This patient has no scheduled appointments

Date: 3/18/2016 Time: 08:30 AM Recurrence: [None] Service: Off Site Services Treatment: CHURCH VISITS Assign to: [None]

Scheduled Appointments on this day/time: 2

Associated Problem / Diagnosis: This patient has no active problems

Medical Notes System Notes

Added Date Added By Note

Click the "+" button to add a new note

Add To Summary

Appointment Summary

Date/Time	Recurring	Service	Treatment	Assigned To
-----------	-----------	---------	-----------	-------------

Save Cancel

## Sample Scheduled Appointments List (On Site)

Scheduling For Site Departments

Click here to watch the scheduling training videos!

Site Department: Multiple Departments Selected

Appointments: Today or 8/4/2014 to 10/2/2014

View	Off Site	Date	Site Department	First Name	Last Name	Patient #	Booking #	Location	Service	Status
		08/05/2014 03:00 AM	Demonstration Facility	JAMES	CROCE	229783pa	591918	CIC-TNXY-M-2-18	Chronic C	Scheduled
		08/16/2014 01:30 AM	Demonstration Facility	VONDA	BAKER	181400-PA		CIC-TNXY-M-2-10	Outpatient	Scheduled
		08/16/2014 01:30 AM	Demonstration Facility	Joe	Cain	419724pa	591950	CIC-TNXY-M-2-6	Outpatient	Rescheduled
		08/16/2014 03:00 AM	Demonstration Facility	Joe	Cain	419724pa	591950	CIC-TNXY-M-2-6	Mental H	Rescheduled
		08/26/2014 10:00 AM	Demonstration Facility	JAMES	CROCE	229783pa	591918	CIC-TNXY-M-2-18	Outpatient	Scheduled
		08/27/2014 10:30 AM	Demonstration Facility	JAMES	CROCE	229783pa	591918	CIC-TNXY-M-2-18	Outpatient	Scheduled
		08/27/2014 05:00 PM	Demonstration Facility	JESSE	BAKER	348660-PA	591772	CIC-TNXY-M-1-10	Medical	Scheduled
		09/09/2014 07:00 AM	Demonstration Facility	JAMES	CROCE	229783pa	591918	CIC-TNXY-M-2-18	Chronic C	Scheduled
		09/09/2014 07:30 AM	Demonstration Facility	JAMES	KELLY	464616pa	33223423	CIC-TNXY-M-1-8	Medical	Scheduled
		09/09/2014 08:00 AM	Demonstration Facility	JAMES	SHARBER	464046-PA	591821	CIC-1-A-1-37	Sick Cal	Scheduled
		09/09/2014 09:00 AM	Demonstration Facility	Patrick	Jones	778547	00025852	E Pod	Medical	Scheduled
		09/09/2014 01:00 PM	Demonstration Facility	JAMES	KELLY	464616pa	33223423	CIC-TNXY-M-1-8	On Site S	Scheduled
		09/10/2014 01:00 PM	Demonstration Facility	JAMES	KELLY	464616pa	33223423	CIC-TNXY-M-1-8	On Site S	Scheduled
		09/11/2014 01:00 PM	Demonstration Facility	JAMES	KELLY	464616pa	33223423	CIC-TNXY-M-1-8	On Site S	Scheduled

21 appointments on 2 page(s)

Scheduling Change Password Logout



## 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 09:30 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					6

## Hospitalization

In the event that an inmate requires hospitalization, Wellpath authorizes, schedules, and coordinates the provision of all inpatient services. Wellpath staff make referrals for inpatient care through the Care Management system. Any hospitalizations are authorized by Dr. Meadows or his designee.

Wellpath staff arrange inpatient care when an acute care setting is deemed necessary or in emergency situations, coordinating with hospital administration as needed. We will continue to utilize Banner Lassen Medical Center whenever possible for inpatient care. Emergency psychiatric hospitalization is coordinated through Lassen County Behavioral Health staff and custody staff through established Penal Code and Welfare & Institution Code protocols. Wellpath staff coordinate such hospitalizations with custody staff so arrangement can be made for temporary release, hospital guards, etc.





### Prospective Review (Prior Authorization)

Wellpath requires prior review and authorization of all non-urgent or non-emergent care. Our clinicians follow NCCHC standards and correctional guidelines to review and approve services. Dr. Meadows will initiate a second review if standards are not clearly met. Alternative treatment is only 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 requires prior authorization.

### Length of Stay Management

The Wellpath Regional Care Manager will continue to manage all off-site, inpatient care on a daily basis through contact with the hospital. The Wellpath Care Management team is notified of inpatient admissions at the time of admission. Our Regional Care Managers and Regional Medical Directors follow NCCHC standards, InterQual Criteria, and correctional guidelines to review inpatient services daily.

### Concurrent Review

The Wellpath Medical Director of Care Management holds clinical rounds via telephone twice weekly to ensure inpatient stays are appropriate and meet national guidelines (InterQual Criteria) for continued inpatient stay. The site Medical Director, Regional Medical Director, and Regional Care Manager attend the clinical rounds discussion. As a result of this multidisciplinary approach, Wellpath ensures that inpatient stays are well-managed and appropriate transitions of care are completed with improved accuracy.

InterQual Criteria provide evidence-based clinical decision support guidelines to ensure that care is provided in the most appropriate setting. InterQual helps providers determine the most appropriate level of care based on severity of illness and intensity of care required.

### Retrospective Review

The Wellpath Care Management Department and site leadership retrospectively review emergency care. Wellpath uses a retrospective review process to resolve claims issues, determine appropriateness of care post-delivery, and perform focused reviews. We will also perform focused reviews at the request of the provider.

### Discharge Planning

Wellpath manages a robust hospital discharge planning process, which begins at inpatient admission. Our Regional Care Manager works 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 Jail.





## **Documentation and Follow-up**

Wellpath staff see patients returning from an off-site medical appointment or hospital stay for follow-up during the next provider sick call clinic, and document the follow-up in the patient's health record. All information and documentation returned with the patient from an off-site provider becomes part of the patient's health record. This includes a disposition and instruction sheet to indicate actions taken, orders written, findings from consults, treatments performed, and a detailed discharge summary for patients returning from an inpatient hospitalization.

## **Financial Responsibility**

Wellpath will not refer or be responsible for elective procedures that can safely be provided when an inmate is released from custody. Any request for elective care requested by an inmate shall be approved by the facility commander for security reasons and shall be the financial responsibility of the inmate.

Wellpath will continue to provide outside providers with other third party payer information when available, as described in section **III.3. Third Party Billing**.

When requested by Lassen County, Wellpath will provide information on our financial liability for medical/surgical inpatient episodes that exceed the dollar threshold as agreed upon in the executed contract. The information will be provided in accordance with all HIPPA regulations.

## **Utilization Review**

Wellpath uses an established review process to ensure that off-site referrals are medically necessary, and that payments made are appropriate. We will continue to coordinate, validate, and track off-site care and invoicing through the Care Management system, which generates reports that allow us to analyze the utilization of off-site services on behalf of Lassen County.

Wellpath uses this data to assess the need for additional on-site and off-site services. We continuously evaluate both the number of cases as well as the costs associated with transporting inmates in determining which clinics are held on site. Constant evaluation of specialty services ensures the most cost-effective solution for clinics.

## **Utilization Statistics**

Wellpath will use our Care Management system to ensure accurate reports for Lassen County. Designated facility administration will be able to log into the Care Management system in order to access management information and monitor off-site scheduling and inpatient status. With our robust Care Management system, Wellpath provides a level of automation and accuracy in reporting that *none* of our competitors can match.

Our Care Management system produces reports containing detailed cost data for purposes of cost analysis and cost containment. These reports include information related to all medical and dental services and associated costs, including laboratory, radiology, and other ancillary services; specialty services; pharmaceuticals; and medical supplies. We will continue to analyze utilization statistics and evaluate the potential benefits of establishing additional on-site clinics. Services brought on site create cost savings as a result of clinic (rather than per patient) rates and decreased officer transportation expenditures.



The Wellpath Care Management system is a powerful tool for tracking and analyzing utilization data. The system's visual dashboards allow the County to compare historical data and trends in patient care. Operational and outcome trending is provided on:

- Admits per 100/1000
- Admits by diagnosis
- Re-admission rates
- ER visits per 100/1000
- ER visits by diagnosis
- ER conversion rates
- Infection rates
- Non-formulary utilization trends
- Non-formulary lab trends
- Prior authorization turnaround times
- Prior authorization outcome rates
- Standard vs. expedited authorization requests

### Sample Dashboards – Off-site Referrals & Inpatient Events





## IV(A).9. Specialty Care and Ancillary Services

Wellpath will continue to ensure appropriate and timely access to specialty care, and will schedule referrals for specialty care providers according to clinical priority. We strive to ensure that specialty services with urgent priorities occur as quickly as possible within 7 days of referral; routine specialty services occur as soon as possible within 30 days of referral. If services do not occur within this timeframe, the medical practitioner re-evaluates the patient to determine and document the level of need.

Wellpath staff schedule appointments for specialty services through our powerful Care Management system, which allows us to track and prioritize specialty appointments to ensure they take place within the required timeframe. In the event that a patient requires specialty services that cannot be provided on site, Wellpath authorizes, schedules, and coordinates the provision of such services with local providers, as described in section [IV\(A\).8. Off-site Services](#).

### *On-site Services*

Wellpath will continue to provide as many on-site medical services as possible in order to limit the number of patients who must be transported off site, while ensuring that inmates receive medically necessary health care services in the most appropriate setting. We understand our role as a steward of the taxpayers' dollars, and we are dedicated to reducing unnecessary costs and community risk associated with off-site care.

We have successfully established many on-site programs and specialty care clinics for our clients. We evaluate statistics regarding off-site specialist consultations to determine what services could be more cost effectively provided on site. Services brought on site typically result in cost savings as a result of clinic (rather than per patient) rates and decreased officer transportation expenditures.

Wellpath will evaluate the potential benefits of the following on-site clinics and will implement them as appropriate:

- |                 |                    |                            |
|-----------------|--------------------|----------------------------|
| • OB/GYN        | • Physical Therapy | • Neurology                |
| • Cardiology    | • Dialysis         | • General Surgery          |
| • Orthopedics   | • Dermatology      | • Urology                  |
| • Ophthalmology | • ENT              | • Other services as needed |
| • Oral Surgery  | • Gastroenterology |                            |

In addition to maximizing on-site medical services, Wellpath also prevents unnecessary use of outpatient/off-site care and inpatient hospitalizations by using our advanced utilization management techniques. The Wellpath Care Management System creates more clinical control and cost efficiencies for both on-site and off-site medical activities. For additional information, please see section [IV\(A\).8. Off-site Services](#).



## **Diagnostic Services**

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

Consistent with the Wellpath care philosophy, diagnostic services are provided on site to the extent possible. We ensure that the Jail has the necessary staff and supplies to provide on-site care and treatment of the inmate population, including but not limited to medical and laboratory supplies. We have par level ordering guidelines and will order the supplies necessary to ensure the continuation of proper care at the Jail.

## **Laboratory Services**

Wellpath will continue to provide on-site laboratory services through BioReference. The laboratory program for the Jail includes necessary supplies and a dedicated printer, timely pickup and delivery, and accurate reporting within 24 hours on most labs. Wellpath ensures that all qualified health care personnel are trained in the collection and preparation of laboratory specimens. The majority of all phlebotomy and 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 all laboratory results, which are reported via a dedicated printer. If test results indicate a critical value, the provider also receives an alert via telephone. All laboratory results are reviewed within 24-48 hours (72 hours for weekends and holidays); the provider is notified immediately to review all STAT lab reports and any abnormal test results. Where preliminary results are available, they are also presented for medical review.

The laboratory program for the Jail complies with all standards set forth by the American College of Pathology and State of California requirements for medical pathology, specimen handling, testing, and reporting. On-site services are performed in accordance with the Clinical Laboratories Inspection Act (CLIA) and comply with the Clinical Laboratory Improvement Amendments of 1988.

Wellpath trains all on-site staff on our laboratory policies and provides a diagnostic procedure manual that includes reporting on STAT and critical values. All diagnostic laboratory reports and any resulting plans for follow-up care become part of the inmate's health record.



## **X-ray Services**

Wellpath will continue working with Banner Lassen Medical Center to provide radiology services, including:

- X-rays
- Ultrasounds
- Sonograms
- Doppler studies
- Holter monitor studies

Results are received electronically, via fax, or manually on paper. Wellpath maintains a log to document the type and number of X-rays completed and the results received. Medical personnel review the log on a daily basis to determine if any test results are outstanding. This process ensures that test results are reported in a timely manner.

All X-rays and radiology special studies are read by a board-certified radiologist, who provides a typed and/or automated report within 24 hours. The radiologist calls the institution if a report necessitates immediate intervention. Dr. Meadows or his designee is notified of all abnormal radiology results and reviews, initials, and dates all X-ray reports within five working days.

Wellpath staff document and store radiology reports in the inmate's health record. Dr. Meadows or his designee meets with the inmate to discuss their results and establishes a plan of care as appropriate. Any follow-up with the patient is also noted in the health record.

## **Prostheses**

Wellpath will continue to ensure the timely provision of medical and dental prostheses, auditory aids, and corrective eyeglasses as appropriate. Inmates in need of prostheses or other aids to impairment may be identified during the receiving screening or at any time while they are incarcerated. Necessary referrals are made for provider evaluation. Results of the evaluation and subsequent plan of care are documented in the inmate's health record, and written provider recommendations are sent to the HSA for follow-up.

Any urgent health care need necessary to maintain daily living activities is expedited to avoid further impairment for the inmate. Those requiring special services, supplies, and prosthetic devices receive such services and supplies when deemed a medical necessity. Assistive devices, such as crutches and wheelchairs, are supplied when the health of the patient would be adversely affected, or as necessary for criminal defendants to assist in their own criminal defense as directed by the responsible physician, and subject to approval by facility administration as not posing any danger to others.

## **IV(A).10. Dental Services**

Wellpath will continue to provide dental services to satisfy the dental care needs of the inmate population in accordance with NCCHC, ACA, and Title 15 standards. We take the dental needs of our patients very seriously, as dental health can have a serious impact on the overall physical health of a patient. Neglect of dental needs can lead to serious infection, affecting both the health of the patient and cost of treatment.





The Wellpath dental program includes screening and examination, triage, emergency and urgent care, restorative care, preventive care, and education for inmates regarding oral hygiene and preventive practices. The primary emphasis of the dental program is the elimination of acute infection, the reduction of dental decay/caries, the reduction of the inflammatory processes of gingival and periodontal disease, the relief of acute pain, and the restoration of function to allow for adequate mastication. In all cases, preventive measures will prevail, utilizing restorative practices when possible, to minimize extractions.

Inmates presenting with dental complaints are triaged and prioritized, and referred to Dr. Raymond White at Susanville Dental Care for off-site dental services. Inmates requiring oral surgery that cannot safely be delayed until release from custody are referred to an outside specialist.

### ***Dental Screening and Examination***

During the receiving screening, nursing staff conduct an oral screening and identify any complaints needing referral. Inmates receive a more in-depth oral screening during their health appraisal to identify additional dental needs or required referrals. A qualified health care professional performs the screening and instructs the inmate on maintaining proper oral hygiene.

Health care staff receive documented training from a dental professional on performing dental screenings, including questions to ask and what to look for, and are tested on their competency. The dental 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

### ***Prioritizing Response to Dental Needs***

Inmates can request dental services through the sick call process. If it is determined that non-treatment would compromise the inmate's health, the appropriate dental services are provided as soon as possible through Dr. White. The Classification and Priority Treatment program gives priority scheduling to:

- Inmates who need emergency dental treatment, including but not limited to those with abscessed teeth, trauma, and facial swelling
- Inmates who have 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 in accordance with dental emergency protocols and refer the patient to an off-site emergency or dental provider if clinically appropriate. Wellpath staff arrange transportation to off-site facilities with custody staff if necessary.



A medical practitioner evaluates patients in need of emergency dental care, with appropriate intervention until the patient can be transferred to an off-site emergency or dental provider as indicated. Dental needs are categorized as Emergent or Urgent: Emergent intervention is provided within 4 hours; Urgent intervention is provided within 48 hours by a medical practitioner.

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 tooth abscess</li><li>• Uncontrollable bleeding</li><li>• Acute cellulites 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 facial/cheek/jaw swelling without compromise to airway</li></ul>

#### **IV(A).11. Vision Services**

Wellpath staff assess vision at the time of the health appraisal and will provide eye care to inmates when it is deemed necessary for their health and well-being. Inmates who are unable to read printed material due to presbyopia or hyperopia, and those with visual acuity of 20/40 or less, will be referred to an optometrist for a more in-depth visual screening.

#### **IV(A).12. Behavioral Health Services**

Wellpath will continue to provide a comprehensive mental health program for the evaluation, treatment, and/or referral of mentally ill inmates, to include all requirements outlined in the RFP and in our current contract.

The Wellpath Mental Health Program, which emphasizes identification, referral, and treatment, is based on established policies, procedures, and protocols that provide consistency of care for each patient. These policies and procedures address the provision of mental health services, including inmate assessment and evaluation, suicide prevention, special needs treatment plans, referrals for care, ongoing care, and discharge planning.

#### ***Identification of Mental Health Needs***

Wellpath staff will continue to identify inmates with serious mental health issues that may impact their ability to function independently while incarcerated. Our mental health professionals are trained to work with patients entering the system who present as naïve to the correctional environment or particularly vulnerable based on stature, mental illness, or developmental disability. They provide assessments, treatment, education, case management, and discharge planning services for these individuals. Inmates with serious mental health issues receive an individualized treatment plan and appropriate mental health services designed to achieve stability as quickly as possible.



As part of the Wellpath Mental Health Program, Wellpath staff obtain community records, verify psychotropic medication regimens, and ensure continuity of care. They initiate referrals for the appropriate services identified as part of the mental health evaluation, which can include psychiatry services, Special Needs Program enrollment, placement in identified mental health units, group programming (including substance abuse treatment services as indicated), discharge planning services, or transfer to more intensive mental health programs if the individual presents with mental health issues beyond what can be safely addressed in a correctional setting.

### **Mental Health Screening and Evaluation**

Early identification of mental health issues is a hallmark of the Wellpath Mental Health Program. All parties benefit when a proactive plan of care is started as soon as possible after admission to a facility, but the most benefit is for the patient.

Admission to a correctional setting can be an overwhelming and distressing event. Establishing contact and rapport with a mental health provider quickly can serve to assuage many concerns and fears while helping the patient realize there are caring providers who will work with them to establish and/or maintain stability throughout the duration of their incarceration.

The early identification process begins at intake to ensure that emergent and urgent mental health needs are met. The Wellpath receiving screening form includes questions regarding:

- Suicide potential
- History of or current psychotropic medication use
- History of psychiatric hospitalization
- History of outpatient mental health treatment
- Current mental status

The mental health component of the receiving screening ensures that mental health clearance takes place as inmates enter the facility. Inmates who are mentally unstable, suicidal, or otherwise urgently in need of clinical attention are referred immediately to mental health staff for further evaluation, or to an outside facility if acute care is needed. Those with non-emergent mental health needs receive a routine referral and are seen by mental health staff within the appropriate timeframe.

In addition to the mental health portion of the receiving screening, a post-admission mental health screening (also referred to as an initial mental health assessment in NCCHC standard MH-E-04) is performed by a properly trained qualified health care professional. Mental health screenings take place as soon as possible, but no later than 7 calendar days after admission. Wellpath prioritizes mental health screenings for patients reporting current mental health treatment in the community upon intake.

Wellpath mental health screenings comply with NCCHC standards J-E-05 and MH-E-04, and include a structured interview with inquiries into:



- A history of:
  - Psychiatric hospitalization and outpatient treatment
  - Substance use hospitalization
  - Withdrawal seizures
  - Detoxification and outpatient treatment
  - Suicidal behavior
  - Violent behavior
  - Victimization
  - Special education placement
  - Cerebral trauma
  - Sexual abuse
  - Sex offenses
- The status of:
  - Psychotropic medications
  - Suicidal ideation
  - Drug or alcohol use
  - Drug or alcohol withdrawal or intoxication
  - Orientation to person, place, and time
- Emotional response to incarceration
- Screening for intellectual functioning

Results of the mental health screening are documented in the inmate's health record. Inmates who screen positive for mental health problems are referred to a qualified mental health professional (QMHP) for additional evaluation, which is scheduled based on the urgency of the referral. Wellpath ensures that any inmate displaying acute symptoms (e.g., appearing psychotic or suicidal) is referred immediately for an emergency evaluation by a QMHP, and that steps are taken to ensure the inmate's safety pending evaluation.

The mental health evaluation builds upon the baseline assessment established in the mental health screening, with more in-depth questions regarding:

- History of outpatient and inpatient mental health treatment
- Current psychotropic medication
- Suicide risk, including history of suicidal behavior
- Emotional response to incarceration
- History of substance use and treatment
- Educational, employment, military, legal, and social history
- Availability of family/social support
- History of violent behavior
- History of sexual offenses
- History of victimization
- History of cerebral trauma or seizures



The mental health evaluation also includes a risk assessment and a formal mental status examination. If the mental health evaluation indicates that ongoing evaluation and treatment are required, the QMHP establishes a treatment plan, schedules the inmate's next session, and makes the appropriate referral if a medical or psychiatric provider's services are required. For inmates determined to be at risk of self-harm, the QMHP completes a Suicide Watch Initial Assessment and starts suicide precautions. Those with acute mental illness requiring mental health services beyond the facility scope are transferred to an appropriate facility.

### ***Crisis Intervention***

Wellpath staff play an active role in managing mental health emergencies. Inmates demonstrating self-injurious behaviors and increased suicide risk are placed on constant observation until a comprehensive mental health evaluation can be completed and an appropriate disposition determined. Designated housing is used as a protective environment for inmates exhibiting behaviors that require close monitoring.

When inmates are in crisis, they receive regular visits from mental health staff in order to provide support and evaluate their risk. Providing supportive and diagnostic services to inmates when they are in crisis will:

- Provide needed support to the inmate
- Manage utilization of medical services (research has demonstrated that many people in crisis seek medical attention when their needs are more psychological) and provide a point of collaboration with the psychiatric provider if a medication adjustment or re-assessment is needed

Mental health staff perform scheduled rounds and evaluations when inmates are placed in observation or isolation. Inmates are cleared from close observation and suicide watch only by qualified mental health professionals.

Mental health staff will continue to meet daily with custody staff to share relevant information, to review the status of inmates on constant observation, and to make determinations regarding continued observation or return of inmates to general population. The psychiatrist or designee will determine when an inmate can be returned to general population, with documentation in the inmate's health record regarding the decision.

### ***Triage of Mental Health Referrals***

Mental health referrals can occur at any time during the inmate's incarceration. Wellpath mental health staff review and triage referrals daily and respond to them in accordance with their clinical judgment and applicable standards. Wellpath will continue to provide adequate staffing to allow for timely mental health evaluations so that inmates with mental health issues can be stabilized as quickly as possible and medications can be initiated. Urgent referrals are managed by mental health staff without delay, with follow-up by the Wellpath psychiatric provider as needed. Medical staff address urgent referrals received after hours and contact the on-call provider as needed.





## ***Treatment Planning***

Once safety and stability issues have been addressed, the focus of the Mental Health Program can shift to treatment planning and programming designed to move beyond maintenance and address risk factors for recidivism. Key elements to address include cognitive thinking patterns that are supportive of criminal behavior, trauma histories, and lack of adequate community support (e.g., housing and other resources).

Wellpath uses an individualized approach to treatment planning to ensure that each patient's needs are addressed in the most effective manner possible during their incarceration. Treatment plans include the care to be provided, the roles of the members of the treatment team, and discharge planning as needed.

Wellpath understands the importance of proactive treatment planning and has learned that the delivery of proactive patient care in the correctional setting produces several long-term benefits, including:

- **Fostering patient trust** – Our patients will feel important and heard. The Wellpath team will provide care with the respect and understanding that these patients deserve. This includes knowledge of each patient's specific situation and needs, including communication with previous care providers as necessary to ensure the continuation of patient-specific treatment programs that provide the best possible care while fostering patient trust.
- **Reducing patient emergencies** – We will understand our patients. We will not wait for an emergency to occur. Instead, we will actively treat each patient to ensure that their needs are understood and met. Proactive treatment planning and care will reduce emergencies that typically result from the provision of reactive patient care.
- **Identifying relevant trends** – We will implement CQI audits to evaluate our programs and to help us anticipate issues before they occur. We systematically review the quality of our mental health services throughout the year and take actions to improve processes and outcomes based on these reviews.
- **Improving the level of services being offered** – We will continue to work closely with Lassen County to develop site-specific improvements where possible.

## ***Counseling Services***

Wellpath staff may refer inmates to a program of individual and/or group counseling services designed to address the mental health needs of the Jail's inmate population. As part of the mental health evaluation, inmates identified as having significant mental health needs are evaluated by a member of the mental health staff for enrollment in individual or group counseling services.

Wellpath views incarceration as an opportunity for individuals to pursue life skills development and sobriety. Various group topics may include Batterer's Treatment, Anger Management, Parenting, and Socialization. Wellpath group therapy programs are offered in addition to the other fundamental aspects of the Wellpath Mental Health Program, including crisis management, special needs programming, intake evaluations, and suicide prevention. We also educate inmates on identifying, navigating, and applying for community services upon release.



## Continuity of Care

Wellpath mental health staff serve as the primary liaison between incarcerated persons and the Lassen County Behavioral Health Department and other behavioral health service providers in Lassen County. We will continue to work with outside providers to ensure continuity of care for incarcerated persons in preparation for release in an effort to ensure continuing behavioral health and related re-entry services upon release from custody and return to the community. All newly incarcerated individuals are observed and queried for signs or presence and history of mental illness.

## Community Linkage

Wellpath focuses on care coordination for inmates with mental health needs, from incarceration to release. We view ourselves as part of the community mental health continuum, and we are dedicated to working with community providers when their clients are admitted to the jail setting.

Wellpath partners with community providers to enhance continuity of care for the Jail's inmate population. We are committed to being active in connecting our programs with community efforts, which allows us to obtain information regarding community treatment regimens and refer patients before release to appropriate community programming. We will maintain relationships with community organizations to obtain previous treatment information, including medical and mental health records, to ensure continuity of care for all inmates.

## Re-entry Services

Discharge planning must start on Day One in order to be effective, and Wellpath has policies in place regarding discharge planning for released inmates. During initial contact with the clinical provider, inmates are informed about community resources available upon discharge. Wellpath works with local providers to ensure continuity of care for discharged patients, especially those with dual diagnoses of mental illnesses and substance abuse. We strive to enhance these patients' state of health and **reduce the likelihood of recidivism** by providing them with as many resources as possible to continue their treatment plans.

When an inmate is discharged from the Jail, Wellpath assists in creating discharge plans that detail the needed post-release care. We medically clear inmates for discharge and secure a medical necessity form signed by the practitioner for any discharge medications. Within 48 hours of notification of an inmate's pending release into the community, Wellpath staff perform a discharge screening to determine the need for post-release medications and medical assistance.

Wellpath staff will continue to make appropriate post-release referrals for continuing care. If immediate post-release care is needed, we coordinate with community providers to secure post-release placement. We also assess the need for medical assistance and assist with the completion of necessary paperwork.

## Accessing Health Care

During incarceration, Wellpath works hard to provide each inmate with the medical care needed to live a healthy life. Outside of jail, obtaining quality health care services can be daunting for offenders. Wellpath understands this and works with each inmate to ensure that continuity of care from jail to community is intact and that no medical needs go unaddressed. Through private or public health care services, we help to build a plan with each patient and provide the right tools for them to obtain health care benefits, including Medi-Cal enrollment as applicable.



Our discharge planning program includes connectivity to services in the community to address medical and mental health care, substance use treatment, and housing needs for released inmates. Linkage for inmates with serious mental illness (SMI), substance use disorder (SUD), and/or significant medical health issues typically includes housing assistance, scheduling appointments, transportation arrangements, and the exchange/release of health-relevant information, when release date is known.

### **Mental Health Referrals**

Mental health presents a challenge for most jails and a great opportunity to make a significant impact on the community. Wellpath mental health professionals coordinate discharge planning and reintegration services in order to bridge the gap in care when re-entering the community.

Most patients require long-term or repeated episodes of care to achieve sustained abstinence and recovery. Therefore, establishing community connections is an integral component to the Wellpath Mental Health Program. We will continue to coordinate with community providers to arrange post-release treatment to enhance continuity of care and reduce recidivism.

### **Substance Abuse Services**

Substance abuse treatment is another integral component for many released patients. Because addiction is typically a chronic disease, people cannot simply stop using drugs for a few days and be cured. Most patients require long-term or repeated episodes of care to achieve the ultimate goal of sustained abstinence and recovery of their lives. Attempting to navigate free world demands while also attempting to maintain sobriety in the absence of community treatment resources is not likely to be successful. Therefore, we will continue to coordinate appropriate substance abuse treatment services upon release.

### **Linkage to Community Resources**

An effective discharge planning process begins at intake and extends continuity of care for our patients by helping to connect them with community resources. Most offenders are under our care for a limited time, so they must be made aware of available services, and know how to access them for support long after they are released from custody. Our goal is to educate inmates about all resources available to them to help meet the challenges faced in sustaining a healthy and crime-free lifestyle. Wellpath works hard to provide as many community resources as possible to enable discharged patients to continue their treatment plans, with the goal of enhancing their physical and mental health and reducing the likelihood of recidivism.

Linkage to community services is a critical component of any re-entry plan. Wellpath has a long history of establishing connections with local resources so they are ready and willing to accept clients re-entering the community from incarcerated settings. Connectivity with community providers greatly enhances the discharge planning services offered to our clients. We also educate inmates on identifying, navigating, and applying for community services upon release.

### **Psychiatric Screenings**

Wellpath will continue to conduct psychiatric screenings at intake, during triage, and at daily sick call. Medication assessments, including maintenance of approved current prescriptions and initiation of appropriate and necessary voluntary medication, are available on a daily basis. Qualified nursing intervention is available for sub-acute psychiatric problems.

Wellpath staff will maintain a collaborative relationship with LCBH Forensic Services, but will retain the authority and responsibility for the implementation, modification, and continuation of all psychiatric treatment in the Jail. Wellpath staff will also continue to collaborate with Lassen County Behavioral Health Services via a mutual psychiatric Release of Information (ROI) form and will provide for access to the psychiatric portion of inmates' health records as appropriate, with provisions for consultation documentation.

### ***Mental Health Staffing***

Licensed mental health professionals will continue to provide psychiatric care, including crisis evaluations, psychiatric assessments and referrals, medication and side effects monitoring, and any required follow-up or discharge planning. A licensed psychiatrist, Michael Salib, MD, provides coverage for the Jail on a regularly scheduled basis; on-call coverage is provided by Aligned.

A mental health professional provides on-site assessment and treatment of patients with clinical symptoms. Wellpath also provides on-call mental health services.

### ***Telepsychiatry***

Wellpath will continue to supplement the Jail's on-site behavioral health coverage by using telepsychiatry as appropriate for assessments and consultations, and will provide appropriate personnel to be present during telepsychiatry sessions.

### ***Forensic Drug Screens***

Wellpath will continue to provide confidential urine drug screens as requested by Lassen County Behavioral Health forensic services for psychiatric/dual diagnostic purposes.

## **IV(A).13. Management of Pharmaceuticals and Distribution of Medications**

Wellpath will continue to provide pharmaceutical services in accordance with all applicable laws, guidelines, policies and procedures, and accepted community standards. Our pharmaceutical management program includes formulary and non-formulary oversight; prescribing, filling, and administering of medications; record keeping; appropriate licensure; DEA management; and the secure and proper storage of all medications.



Wellpath will continue to partner with Correct Rx Pharmacy Services, Inc. in Lassen County. Correct Rx offers professional comprehensive

pharmaceutical services for all prescription, non-prescription, and intravenous solutions as ordered by all prescribers, as well as clinical management and technology solutions. As our pharmacy vendor, Correct Rx maintains all pharmaceutical licenses in accordance with state and federal regulations.



Our pharmaceutical program and medication management processes follow all applicable federal, state, and local guidelines, including NCCHC, ACA, and Title 15 standards.



Correct Rx will continue to ensure:

- Continuity of patient care
- Technicians and support personnel that have established relationships with facility staff
- A reliable delivery model
- The commitment to work hard every day to exceed your expectations

Wellpath has a well-established relationship and a national contract with Correct Rx, utilizing their services at many of our contracted facilities across the country. Our strong partnership with Correct Rx allows us to receive and pass on to Lassen County **cost-effective and competitive pricing** for pharmaceutical services. Additionally, the Wellpath program with Correct Rx offers the ability to receive credit on returns.

### **Medication Administration**

Wellpath provides written systems and processes for the ordering and administration of medications at the Jail. We tailor medication pass for the Jail to ensure the timeliness and accuracy of the process, coordinating with security staffing and meal times to ensure accurate and effective medication administration.

All medications, including over-the-counter medications, are administered by personnel appropriately licensed in California. The Wellpath staffing plan includes nursing coverage to conduct medication pass, per physician's orders, at least twice daily for inmates in general population, and more frequently as needed for inmates in medical housing or observation, or as medically indicated.



Nurses distribute medications generally twice per day, with additional medication passes for patients requiring TID (3x/day) or QID (4x/day) medications.

Wellpath staff receive orientation training in addition to a mandatory CEU regarding medication administration and the prevention of medication errors. Nursing staff always observe patients taking medications, especially when Direct Observation Therapy is required by physician's order. Wellpath staff are also trained to provide Direct Observation Therapy for medications subject to abuse, psychotropic medications, and those related to the treatment of communicable and infectious diseases.

### **Medication Administration Records**

Wellpath staff document medication administration and missed doses in a patient-specific Medication Administration Record (MAR), which becomes a permanent part of the inmate's health record. All information relative to a patient's prescription is recorded in the MAR, which includes instructions, injection site codes, and result codes, as well as non-administered medication reason codes. In the event that an inmate misses or refuses doses on three consecutive days, or if a pattern is noted, the inmate is referred to the prescribing clinician and each medication refusal is documented.





CorEMR includes a pharmacy module for ordering, making med pass assignments, and scheduling refills. The system houses Lassen County's formulary and identifies formulary medications. It also allows the filtering of the drug list by name, analgesic category, form, and other criteria. Wellpath staff use the CorEMR electronic Medication Administration Record (eMAR) to document medication administration. The eMAR configures med pass times by day and generates med pass prep lists accordingly. These lists can be grouped by housing unit or alphabetically by last name. Each patient's acceptance or refusal of each dose is recorded in the eMAR; graphical and detailed MAR reports can be viewed at any time.

Additionally, the system automatically highlights medication expiration dates and refill notifications. Medications received from the pharmacy are shown on an inventory check-in screen. CorEMR can also generate reports showing all prescriptions by drug name or by patient; prescriptions ordered by date range; medication compliance, refusal, and dosing summary reports; missed doses, and more.

#### **IV(A).14. Medical Records**

Wellpath will continue to maintain up-to-date health records at all times, consistent with facility policies and procedures; community standards of practice; and all federal, state, and local laws. All records are maintained in accordance with the NCCHC, ACA, and Title 15 standards, as well as the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Health Information Technology for Economic and Clinical Health (HITECH) amendment to HIPAA. Compliance training for HIPAA and HITECH is a mandatory part of Wellpath's new employee orientation and is also required annually for all Wellpath employees.

Wellpath staff will continue to document all health care contacts and encounters in the inmate's health record in the proper format. Each record contains an accurate account of the inmate's health status at the time of admission, patient-provider encounters, and on-site and off-site services provided. Following the receiving screening, health care staff initiate a comprehensive health record that is the single source of medical, dental, and mental health information for each inmate. Wellpath staff will continue to coordinate with Lassen County Behavioral Health to ensure accessibility to and completeness of the records.

Wellpath will continue to manage the security and accessibility of health records in compliance with state and federal privacy regulations. Dr. Meadows approves health record policies and procedures, and defines the format and handling of health records. Ms. Blacka controls access to health records to ensure patient confidentiality. Each inmate's health record is kept separate from the confinement record. Custody staff have access to any information deemed necessary in determining an inmate's security rating, housing assignment, job suitability, etc.

#### ***Transfer Summaries***

Pertinent medical information is prepared to accompany all inmates when traveling off site to a specialty appointment or emergency room, or when transferring to another detention/correctional facility. Upon transfer to another facility, the inmate is accompanied by a medical summary containing all necessary information required for the continuation of treatment.



### ***Release of Information***

Wellpath will continue to ensure that all medical information about inmates is treated as confidential and is not shared with entities outside the Jail, except as provided by facility policy, a court order, or in accordance with applicable law.

### ***Electronic Health Records***

Wellpath will continue to maintain electronic health records using the current CorEMR system. We have considerable experience with CorEMR and will continue to support this EHR platform in Lassen County.



Upon conclusion of the contract, health records would remain the property of the County, and Wellpath would work to ensure a smooth transition of records. Wellpath would make the software and records available to the County at no cost.

### ***IV(A).15. Medical Diets***

Wellpath staff will continue to make recommendations regarding any special dietary needs based on the patient's medical history and physical evaluation. The special needs screening performed at intake will include verification of medically necessary special diets. Wellpath only prescribes therapeutic and not preferential diets. We will continue to work closely with the Jail's Food Services Supervisor to communicate special dietary needs and to ensure that any documented food allergies are medically indicated.

Wellpath staff will continue to review inmates with special dietary needs every 90 days. If, after a review, it is determined that a special diet is no longer required, we will notify the patient and the Food Services Supervisor. Patients have the right to refuse this aspect of care, consistent with their options for participation in care within the community. If a patient refuses a special diet, Wellpath staff will document the refusal in the patient's health record.

### ***IV(A).16. Pre-placement Physical Examination***

Wellpath will continue to provide an assessment of an inmate's ability to perform the physical requirements of certain work crew assignments, within five days of the request of custody staff. We will continue to provide medical screening for inmate workers prior to their assignment to kitchen duty, coordinating clearances within five working days.



## IV(B). JUVENILE HALL

Wellpath will continue to provide high-quality, standards-compliant medical services to wards in the Lassen County Juvenile Hall.

### IV(B).1. Receiving and Screening

Wellpath understands that intake to the Juvenile Hall is dependent upon a clearance for injury, medical or behavioral health emergent issues, and that our responsibility begins at intake and ends upon discharge. We understand that any costs associated with medical or behavioral health care provided prior to intake during the booking process will not be Wellpath's responsibility, unless the ward is booked during an inpatient stay at the hospital, in which case the ward's inpatient medical costs will become Wellpath's responsibility after completion of the booking process at the hospital (i.e., booking by proxy).

The receiving screening provides a critical foundation for early detection and initiation of proper treatment for wards requiring medical care and establishes medical clearance before admittance to the Juvenile Hall. Identifying wards with immediate and long-term health care needs helps the County to avoid unnecessary legal and financial risks. The receiving screening as a valuable tool for addressing immediate medical needs and assisting with housing decisions or special needs for wards. Wellpath provides extensive training to the RNs who work this area, including a two-day course to train and test ability for conducting an assessment.

When on duty, a nurse conducts receiving screenings upon booking, using a County-approved screening tool that is valid and reliable. Timely receiving screenings allow health care staff to identify and address any urgent health needs; identify individuals who may be contagious and require isolation; determine any known or identifiable health needs that require attention prior to a health appraisal; and identify individuals who may pose a potential threat to themselves or others. The basic components of the receiving screening include inquiries into a wide range of current and past health issues, such as:

- current or past health condition or illnesses
- recent symptoms of communicable disease
- alcohol/other drug use
- mental health problems including any suicidal thoughts or risk
- assessment of suicidal risk
- medications and dosages
- routine medical treatments
- special health requirements (including dietary needs or restrictions)
- history of trauma and/or abuse/sexual assault
- history of hospitalizations
- dental issues/problems
- allergies
- current or recent pregnancy (as applicable)
- health insurance coverage
- cognitive or physical impairments
- screening for tuberculosis, as appropriate



The screening also includes a review of any available behavioral health information, collection of various vital signs (temperature, pulse, blood pressure, height, weight and SpO<sub>2</sub> measurement), capillary blood glucose testing for persons with diabetes, peak expiratory flow rate for persons with asthma, oxygen saturation for persons with emphysema, and pertinent observations (behavior, body deformities, ease of movement, persistent cough or lethargy, and skin condition). Upon admission, wards who are under the influence of alcohol or drugs or those suspected of infectious diseases, are separated from the general population and kept under close observation. Wellpath ensures proper management of any ward requiring segregation due to drugs, alcohol, or infectious disease.

#### **IV(B).2. Health Inventory and Communicable Disease Screening**

Wellpath will continue to perform a health inventory/appraisal and communicable disease screening, including a complete medical history and physical examination, for all wards prior to their being in custody for seven days, in accordance with NCCHC standards. The health inventory and screening is completed by a physician, mid-level provider, or properly trained nurse in accordance with CCR Title 15 Section 1432.

Communicable disease screening include, at a minimum, screening for tuberculosis and other diseases in accordance with the findings of the health inventory. Sexually active minors are screened for Chlamydia and Gonorrhea. All minors are asked if they are sexually active as part of the health inventory, and if they answer in the affirmative, they are tested for Chlamydia and Gonorrhea. The completed health inventory form is reviewed with the ward by a qualified health services professional.

Positive findings are recorded on the ward's problem list. A follow-up plan of action is developed and documented in the ward's health record. Positive findings and conditions requiring further evaluation and/or treatment are referred to the appropriate medical provider. Active TB and other communicable diseases that are identified are immediately referred to the Lassen County Health Department.

#### **IV(B).3. Communicable Disease Testing (P.C. 7500)**

Wellpath staff will continue to blood samples from wards in compliance with Penal Code Section 7500, "et al," as requested by the County Health Officer and with the ward's consent. Health care staff do not participate in involuntary specimen collection. Public Health will continue to be responsible for pre- and post-counseling services.

#### **IV(B).4. Daily Triage**

Wards' written health complaints and requests are collected and triaged daily by qualified health services staff. Urgent requests are seen by the medical provider or nursing staff. Emergency requests are seen immediately, with the ward transported off site as required. All sick call requests have the following notations: date and time reviewed, signature of the health services staff, and disposition (i.e., scheduled for sick call, referred to mental health provider, transferred to off-site treatment facility). All sick call requests are filed in the ward's health record.

Dr. Meadows will continue to oversee the triage system in the Juvenile Hall. Wellpath has specific triage guidelines to assist nursing staff in responding to a variety of medical complaints (i.e., dental pain, alcohol withdrawal, pregnancy, diabetes, seizures). To ensure that employees are adequately trained to perform these tasks, Wellpath provides a comprehensive orientation program.



All nurses attend a regional certified physical assessment course designed for correctional nurses. These regional programs are sponsored by Wellpath.

#### IV(B).5. Sick Call

Our correctional health delivery system follows a strong, routine sick call process to ensure the swift delivery of medical care. Wellpath has implemented and maintains a timely formal sick call procedure to address all non-emergency illness or injury issues. Our sick call processes follow all applicable federal, state, and local guidelines, including NCCHC, ACA, and Title 15 standards, and guidelines established by the County. Our sick call system includes:

- medical requests submitted by wards and collected only by health care staff at least twice daily. For wards in lockdown units, medical requests will be collected during medication passes twice a day.
- daily triage by trained Registered Nurses, including a review of medical charts for the ward
- direct resolution of inquiries or time sensitive matters
- documentation for scheduling and tracking
- scheduling of appropriate sick call visits
- clinic triage and screening

Wellpath nurses record the following sick call information at the time of triage:

- ward name, ID number, and location
- date of triage
- description of problem
- disposition of request

Nursing personnel then schedule the ward for a sick call appointment, to take place immediately for emergent concerns, within 24 hours for urgent concerns, and within 48 hours (72 hours on weekends) for routine requests. During the sick call visit, Wellpath team members take vital signs and explain the nature of the problem and its treatment.

If a nurse determines that clinician follow-up is necessary, a physician or mid-level provider referral is made immediately for emergent concerns, within 24 hours (up to 72 hours on weekends or holidays) for urgent concerns, and within 14 days for all other concerns.

Wards have the opportunity to request health care services at least twice daily, and we enforce the timely follow-up of care. We document all requests and review them for immediacy of need/required intervention and prioritize them for the daily schedule. Our health care specialists monitor sick call as part of our continuous quality improvement programs. All wards, regardless of housing assignments, have access to regularly scheduled sick call. Ongoing training and internal monitoring of this process is a key to our success.





Requests for mental health services are reviewed by a health care staff member who coordinates the intervention recommended by the primary care provider. If the health care professional deems the sick call request to be urgent/emergent and mental health team members are not available at the time of receipt, health care staff notify the on-call mental health provider to review and provide orders regarding the sick call concern. We record all telephone orders in the ward's health record.

For wards who do not attend their scheduled appointments, the health care team follows up with the ward and reschedules the appointment to coincide with the next available sick call. They document the reason for the missed appointment or no-show in the ward's health record and in the call log. If a ward refuses his/her allotted sick call, Wellpath staff complete a refusal form that is included in the ward's health record.

Additionally, Dr. Meadows or his designee conducts an evaluation of the triage skills of those performing this function as part of an internal CQI and professional peer review. This involves the provision of a physical assessment course and is evaluated annually at a minimum. This course is provided by a third party who tailors the training to correctional nurses. We have also developed an in-house course which includes a number of our medical providers who have provided training throughout our system.

### ***Segregation Rounds***

All wards have access to health care services (including sick call) regardless of their housing location. Should a ward's custody status preclude his/her attendance at sick call, we arrange to provide sick call services in the unit of the confined ward. Wellpath health care team members provide the same level of care (as directed by our program and treatment protocols) to wards in a segregation unit as wards housed in any other unit. Our nursing team members and/or mid-level provider team members make daily rounds for all segregation unit wards.

All contact with health care staff, no matter the ward's placement, is documented in the ward's health record to ensure health care consistency and accuracy.

### **IV(B).6. Emergency Services**

Emergency services are available 16 hours per day when health care staff are on site at the Jail, with the on-call provider available after hours. Wards requiring emergency services beyond the on-site capacity of the Juvenile Hall as determined by the on-call provider are transferred to the local hospital or other appropriate acute care facility. Dr. Meadows or his designee will monitor the status of the patient on a daily basis by communicating with the attending physician.

### **IV(B).7. Sobering**

Wellpath manages detoxification services for patients withdrawing from drugs and/or alcohol in a cell that allows for frequent monitoring and observation by both custody and medical staff. We take the management of drug and alcohol withdrawal very seriously. We understand the high-risk nature of this medical issue and continually review and revise our policies and protocols as advances are made to this area of medicine.

Wards identified by self or deputies as substance abusers are evaluated by health services staff to determine medical status. After medical status is determined, Wellpath staff provide an evaluation, treatment, and referral to be carried out in accordance with direct physician orders, or approved Wellpath protocol/standardized procedures.

Disorders associated with alcohol and drug problems (e.g., HIV, liver disease) are recognized and treated. All evaluation, treatment, and referral data is recorded in the ward's health record. Wards who have been treated for chemical dependency during their incarceration are counseled and referred to community resources upon release from the facility.

Wellpath has used proven, evidence-based withdrawal protocols, aligned with NCCHC, ACA, and Title 15 standards and ASAM protocols, that address detoxification from all commonly abused substances found in detained populations. We believe that our proven withdrawal protocols allow for improved and safer withdrawal care. Our guiding principles and goals for the safe withdrawal from drugs of abuse are as follows:



- Early identification of wards likely to need withdrawal treatment and identifying those wards who may be at higher risk for complications from withdrawal
- Early provider engagement in the management of care
- Early treatment of withdrawal symptoms
- Early Identification, and referral to a hospital, for wards needing a higher level of care

Individuals booked into the facility who are intoxicated, a threat to their own safety, or the safety of others, are placed in the protective environment of a sobering cell where they are under close observation by custody and health services staff. Wellpath provides continuing observation and assessment at a minimum of every four hours thereafter, documented on the custody monitoring log posted on the door and the Wellpath Alcohol Withdrawal Syndrome Assessment (CIWA) or Clinical Opiate Withdrawal Scale (COWS) form. Wards remaining in sobering cells longer than four hours are seen by the physician or mid-level provider during regularly scheduled sick call and at any time when requested by custody staff.

Withdrawal from alcohol and drug intoxication, when performed inside the facility, is under medical supervision in accordance with direct orders from the responsible medical provider and/or approved protocols/standardized procedures. All protocols were developed using the work of experts in the field of addiction medicine, and use the CIWA and COWS assessment tools for alcohol and opioid withdrawal.

The responsible provider is called and/or the ward sent to the local Emergency Department for all wards meeting the following criteria: non-improving CIWA/COWS scores in response to medication after 6 hours; seizures; severe, profound confusion; and/or temperature greater than 101 degrees. If the physician cannot be reached, the ward is transferred to the local Emergency Department.



Wellpath conducts annual training on withdrawal timelines, signs, and symptoms to a variety of substances common and uncommon to the local population.

#### **IV(B).8. Off-site Services**

Wards requiring acute hospital services such as critical and intensive care/monitoring and general surgery are referred to Banner Lassen Medical Center. Wellpath is financially responsible for wards' care from the time of clearance and physical placement into the Juvenile Hall (subject to catastrophic limitations). No referrals are made to any facility without the approval of the physician or on-call medical provider. Dr. Meadows is responsible to liaison with hospital staff to transfer wards back to custody as soon as medically feasible.

Wellpath will continue to coordinate emergency psychiatric hospitalization with the Lassen County Behavioral Health forensic staff and custody staff through established Penal Code and welfare and Institution code protocols. We will continue to coordinate hospitalizations with custody staff so that arrangements can be made for temporary release hospital guards, etc. All off-site care is approved and referred by our staff using the approved Wellpath request forms.

Wellpath is not responsible for elective procedures that can be safely delayed. Wards will continue to have access to their private physicians at their own expense, and health services staff will continue to coordinate with Probation staff to schedule these appointments. To facilitate appropriate billing of third party insurers, Wellpath gives outside providers third-party payer information when available.

#### **IV(B).9. Specialty Care and Ancillary Services**

Wellpath will continue to provide as many on-site medical services as possible in order to limit the number of wards who must be transported off site, while ensuring that wards receive medically necessary health care services in the most appropriate setting.

When a ward requires specialty services that cannot be provided on site, Wellpath authorizes, schedules, and coordinates the provision of such services with local providers. Referrals for off-site treatment are limited to the chief complaint(s) indicated through a referral form and/or medical consultation. Referrals are approved based on appropriateness and necessity.

#### ***Diagnostic Services***

Wellpath will continue to provide diagnostic services and procedure, including laboratory, x-ray, and other ancillary services, as medically indicated. Laboratory services will continue to be provided by BioReference.

Consistent with the Wellpath care philosophy, diagnostic services are provided on site to the extent possible. We ensure that the Juvenile Hall has the necessary staff and supplies to provide on-site care and treatment of wards, including but not limited to medical, laboratory, and radiology supplies. Wellpath will continue to provide on-site laboratory services through BioReference.



## **Prostheses**

Wellpath will continue to ensure the timely provision of medical and dental prostheses, auditory aids, and corrective eyeglasses as appropriate. Wards in need of prostheses or other aids to impairment may be identified during the receiving screening or at any time while they are incarcerated.

Necessary referrals are made for provider evaluation. Results of the evaluation and subsequent plan of care are documented in the ward's health record, and written provider recommendations are sent to the HSA for follow-up.

Any urgent health care need necessary to maintain daily living activities is expedited to avoid further impairment for the ward. Those requiring special services, supplies, and prosthetic devices receive such services and supplies when deemed a medical necessity. Assistive devices, such as crutches and wheelchairs, are supplied when the health of the patient would be adversely affected, as directed by the responsible physician, and subject to approval by facility administration as not posing any danger to others.

## **IV(B).10. Dental Services**

Our health care personnel typically perform dental screening at the time of the health appraisal. Instruction in proper oral hygiene and preventive oral education are available to wards upon request and/or within one month of admission.

Wellpath arranges for dental services in a manner consistent with community standards of care. Health care personnel triage, prioritize, and schedule wards to see the off-site dentist if required. If the ward's dental requirements are emergent, they are scheduled to see the dentist as soon as possible. Referrals for emergency services are also available 24 hours per day. If transportation to off-site facilities is necessary, Wellpath arranges such with Probation staff. A record of dental treatment is maintained in each ward's health record.

## **IV(B).11. Vision Services**

Wellpath staff conduct a vision screening as part of the initial health appraisal, and refer the ward for an eye exam if indicated. Optometry services are provided off site by a licensed optometrist as medically indicated. Services include evaluation, diagnosis and treatment of eye conditions, and examinations. Eyeglasses are provided as medically indicated. If an ophthalmologist's services are necessary, we will coordinate transportation with Probation staff.

## **IV(B).12. Behavioral Health Services**

Wellpath will continue to provide a comprehensive mental health program for the evaluation, treatment, and/or referral of mentally ill wards, to include all requirements outlined in the RFP and in our current contract.

The Wellpath Mental Health Program, which emphasizes identification, referral, and treatment, is based on established policies, procedures, and protocols that provide consistency of care for each patient. These policies and procedures address the provision of mental health services, including assessment and evaluation, suicide prevention, special needs treatment plans, referrals for care, ongoing care, and discharge planning.





### ***Mental Health Staffing***

Wellpath will continue to provide a psychiatrist's services one hour each week via telepsychiatry. A licensed psychiatrist, Michael Salib, MD, is also available five days a week to initiate intervention and treatment (medications) as necessary.

### ***Psychiatric Screenings***

Wellpath will maintain a collaborative relationship with LCBH employees and Behavioral Health Clinicians contracted with the Probation Department who assess, evaluate, and counsel minors. Additionally, we will continue to provide a licensed mental health clinician or a nurse with psychiatric training as needed each week to provide assessments, counseling, and intervention for minors who express suicidal ideation, are taking psychotropic medications, or are referred for psychiatric review. This individual interfaces between the minor and the psychiatrist and is available on call.

### ***Forensic Drug Screens***

Wellpath will continue to provide confidential urine drug screens as requested by Lassen County Behavioral Health forensic services for psychiatric/dual diagnostic purposes. The collection of forensic evidence from wards is conducted in accordance with Title 15, Article 9, section 1452.

### ***Information Sharing***

Wellpath will continue to collaborate with Lassen County Behavioral Health Services via a mutual psychiatric Release of Information (ROI) form and will provide for access to the psychiatric portion of wards' health records as appropriate, with provisions for consultation documentation.

## **IV(B).13. Pre-placement Physical Examination**

When directed by Juvenile Hall staff, Wellpath will continue to conduct and complete physical examinations on wards prior to their placement to certain outside camps, ranches, or other such facilities, if such facilities have established criteria for admission. We understand that information that is available from the initial physical screening has generally been sufficient.

## **IV(B).14. Management of Pharmaceuticals and Distribution of Medications**

The Wellpath pharmaceutical program and medication management processes follow all applicable federal, state, and local guidelines, including NCCHC, ACA, and Title 15 standards, as well as guidelines established by Lassen County to provide and distribute medications. Wellpath will continue to manage the procurement, payment, inventory control, dispensing and disposal of all pharmaceuticals, including psychotropic medications.

Wellpath ensures that all patients placed on medication are evaluated for side effects and blood level monitoring for signs of toxicity and other blood testing as clinically indicated. Vitals and medical indicators will be checked on a regular basis and drug levels will be monitored where appropriate. All health care documentation will be recorded in the ward's file.





Under our pharmaceutical program, we will continue to:

- maintain inventory, cost, and ordering records for all pharmaceuticals including all over-the-counter medications dispensed by the pharmacy
- generate non-formulary requests electronically (i.e. computerized ordering and tracking in a system)
- keep current patient drug profiles
- identify potential interactions for all ordered drugs
- generate monthly electronic reports which summarize all the monthly medication administration records
- identify any ward who is enrolled in a chronic care clinic
- generate lists of wards whose medications are within seven days of expiration
- generate a monthly report of the most frequently prescribed drugs and the most expensive drugs prescribed
- develop and implement a Continuous Quality Improvement (CQI) program for the pharmacy program demonstrating a knowledge and focus on outcome measures and indicators
- develop a Pharmacy and Therapeutics Committee

Wellpath's pharmaceutical program is properly operated in accordance with all applicable federal and state laws, and follows all regulations regarding prescribing, storing, dispensing, and administering medications. Under our program, only professional staff with designated privileges may prescribe medications as medically applicable, including:

- physicians
- dentists
- psychiatrists
- designated (mid-level) clinicians

Our pharmacy provider, Correct Rx, specializes in servicing correctional facilities. Correct Rx provides pharmaceuticals within 24 hours, with provisions for on-site deliveries five days a week and contracts with local pharmacies for STAT orders. We have STAT dose capabilities for emergencies and emergency drug kits stocked with medications mutually approved by facility administration. We will continue to work with the local Rite Aid as our back-up pharmacy to ensure emergency medications are received within eight hours of prescription.

Our partnership with Correct Rx allows us to effectively manage the packaging and delivery of medications and helps us control costs for our clients. Pharmaceuticals are stored, controlled, dispensed, and administered in accordance with state pharmaceutical guidelines.

Wellpath maintains a 30-day or 90-day supply of each patient-specific medication, depending on the medication and expected length of stay. Some "very short-stay" patients might have a little as a seven-day supply delivered to the Juvenile Hall, which prevents having excessive unused medications. Whenever possible, Wellpath returns all unused medications to the pharmacy. We document all perpetual inventory and remove all discontinued or abandoned medications from the Juvenile Hall on a regular basis.



## ***Pharmacy Security and DEA-Controlled Medications***

Wellpath secures all DEA-controlled medications by storing them in a double-locked cabinet within the medical unit. In addition, we store all syringes, needles and surgical instruments in secured cabinets to ensure the safety of our staff, custody staff, and wards. Our health care team inventories and manages all DEA-controlled medications according to federal and state regulations. We will continue to work with facility administration to ensure our storage procedures comply with County safety guidelines.

## ***Discharged Wards***

Wellpath nurses maintain a log of discharge medications provided to wards upon release and/or prescriptions called in to the local pharmacy. This applies to all necessary medical medications. Wards with medical prescriptions receive an adequate supply of medications prior to release to ensure that a medication lapse does not occur prior to the ward being able to see their outside provider.

## ***Medication Pass (Pill Call)***

Wellpath nurses employ a safe medication delivery system that includes tracking, accountability, and ease of transporting and administering medications. The patient-specific packaging and barcode labels prepared by Correct Rx are used to deploy multiple safety and tracking opportunities during the entire medication administration process. Wellpath's standard procedures ensure that only properly trained medical personnel, such as LVNs and RNs, administer prescribed medications.

After a medication is prescribed by a duly licensed provider, Wellpath staff enter the order into an electronic Medication Administration Record (eMAR) and notify the pharmacy of the order. Every effort is made to start new medication prescriptions within 24 hours or less of an order being placed or as directed by the provider for a later start date. All new medications that are ordered from the pharmacy are administered at the next medication pass once received. For orders that are identified as stat or immediate, we obtain the medication from our local backup pharmacy.

## ***Distribution Frequency***

Wellpath nurses distribute medications generally twice per day, with additional medication passes for patients requiring TID (three times a day) or QID (four times a day) medications. We will continue to work with Probation to avoid ward routine disruption. Medications are administered seven days per week.

## ***Direct Observed Therapy (DOT)***

Medication will not be left for the ward to take on his or her own. Licensed nurses will watch the ward from the time each pill is given to the time the ward swallows it to ensure the medication is taken. Each time Direct Observed Therapy (DOT) is delivered, Wellpath nurses verify the ward's identity and medication dosage. If this cannot be confirmed, the drugs are not given to the ward. If this occurs, the physician or mid-level provider is informed.

## ***Documentation***

All medications must be taken in the presence of the medication administrator. If a ward displays any side effects after medication administration, the nurse treats and documents the effect in the medication administration record.



In cases where medication is not administered in a timely manner, the nurse documents details regarding why the medication was not administered. Any refusal of medication is documented in the ward's health record and the ward is required to sign a Refusal of Treatment form. After three refusals, Dr. Meadows will counsel the ward regarding the effects.

### ***Segregation Units***

Wellpath will continue to ensure that all wards, including those housed in segregation units, receive medication in a timely fashion.

### ***Formulary (Preferred Drug/Medication List)***

Wellpath uses our standard formulary to ensure that selected medications are safe, effective, and cost-efficient. Our formulary includes items commonly used in the correctional setting. Wards who come into the facility on non-formulary items have their medications reviewed by the on-site physician as outlined in Wellpath's Formulary Exception Request process.

Our policies and procedures address consideration for medications not on our formulary. Dr. Meadows or Dr. Salib may request a non-formulary medication when the medication is:

- medically indicated to assure optimal treatment of the ward
- less likely to result in side effects and/or complications
- the only drug in its class to stabilize and maintain the historical safety of the ward
- necessary when a ward returns to the Juvenile Hall as trial competent on non-formulary medication

Dr. Meadows and Wellpath's Chief Medical Officer monitor medication usage to ensure adherence to the formulary and ensure facility administration are informed on formulary decisions. Additionally, we use a pharmacist to audit and oversee our pharmacy program. Wellpath tracks the use of all non-formulary medication for current medical efficacy and possible future inclusion on our formulary. The formulary is reviewed regularly by our Pharmacy and Therapeutics (P&T) Committee.

### **IV(B).15. Medical Records**

Wellpath will continue to maintain up-to-date health records at all times, consistent with facility policies and procedures; community standards of practice; and all federal, state, and local laws. All records are maintained in accordance with the NCCHC, ACA, and Title 15 standards, as well as the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Health Information Technology for Economic and Clinical Health (HITECH) amendment to HIPAA. Compliance training for HIPAA and HITECH is a mandatory part of Wellpath's new employee orientation and is also required annually for all Wellpath employees.

Wellpath staff will continue to document all health care contacts and encounters in the ward's health record in the proper format. Each record contains an accurate account of the ward's health status at the time of admission, patient-provider encounters, and on-site and off-site services provided. Following the receiving screening, health care staff initiate a comprehensive health record that is the single source of medical, dental, and mental health information for each ward. Wellpath staff will continue to coordinate with Lassen County Behavioral Health to ensure accessibility to and completeness of the records.



Wellpath will continue to manage the security and accessibility of health records in compliance with state and federal privacy regulations. Dr. Meadows approves health record policies and procedures, and defines the format and handling of health records. Ms. Blacka controls access to health records to ensure patient confidentiality. Each ward's health record is kept separate from the confinement record. Custody staff have access to any information deemed necessary in determining a ward's security rating, housing assignment, job suitability, etc.

### ***Transfer Summaries***

Pertinent medical information is prepared to accompany all wards when traveling off site to a specialty appointment or emergency room, or when transferring to another detention/correctional facility. Upon transfer to another facility, the ward is accompanied by a medical summary containing all necessary information required for the continuation of treatment.

### ***Release of Information***

Wellpath will continue to ensure that all medical information about wards is treated as confidential and is not shared with entities outside the Juvenile Hall, except as provided by facility policy, a court order, or in accordance with applicable law.

### ***Electronic Health Records***

Wellpath will continue to maintain electronic health records using the current CorEMR system. We have considerable experience with CorEMR and will continue to support this EHR platform in Lassen County. Upon conclusion of the contract, health records would remain the property of the County, and Wellpath would work to ensure a smooth transition of records. Wellpath would make the software and records available to the County at no cost.

## **IV(B).16. Medical Diets**

To address certain wards' clinical conditions and promote health, Wellpath recommends a proper therapeutic diet, and has developed detailed procedures for the ordering of medical diets in coordination with the County's Food Service Coordinator. Dietary services in the Juvenile Hall adhere to NCCHC, ACA, and Title 15 standards, as well as Lassen County guidelines.

In general, the County's Food Service Coordinator is directed to offer a sufficient variety of meals, allowing individuals with specific dietary restrictions to meet their nutritional needs in an appropriate fashion. Diets to be considered by the facilities' Food Service Coordinator include, but are not limited to:

- restricted calorie
- low sodium
- low fat
- pureed
- soft
- liquid (full or clear)
- nutritional supplementation diets (diabetic, pregnancy)

Our medical staff will provide simple instructions to the wards to ensure their menu selection meets their dietary requirements.



## V. STAFFING PLAN

Wellpath has developed a comprehensive staffing plan for Lassen County based on the requirements of the RFP, a review of the current staffing levels, the information provided to us during the pre-bid tour, and our expertise in this facility as well as in California and the nation. The Wellpath proposed staffing takes into consideration the staffing pattern specified in the RFP, specific needs of the inmate and ward populations, capabilities of the facility staff, details of the physical plant, and a recommended level of providers to perform all necessary duties and functions.

Wellpath is proposing a staffing plan consisting of 5.05 FTEs, which represents an increase of 0.25 FTEs over the current contracted staffing. This increase is based on the addition of 10 hours per week of LVN coverage to the evening shift, which provides additional preparation and support for the physician and psychiatrist clinics. These hours and services are currently being provided to Lassen County and are above the current contracted staffing.

Health care staff will be shared between the Jail and the Juvenile Hall. There will be no dedicated staff for the Juvenile Hall; Wellpath staff assigned to the Jail will provide services as necessary at the Juvenile Hall.

Wellpath Proposed Staffing									
Day Shift									
Position	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Hrs/Wk	FTE
Health Services Administrator (RN)	8	8	8	8	8			40	1.00
RN/LVN	8	8	8	8	8	8	8	56	1.40
Physician/Medical Director*	1	2			1			4	0.10
LCSW/MFT/Psych RN	8	8	8	8				32	0.80
Psychiatrist*				4				4	0.10
<b>Total Hours/FTE – Day</b>								<b>136</b>	<b>3.40</b>
Night Shift									
RN/LVN	8	8	8	8	8	8	8	56	1.40
LVN		5		5				10	0.25
<b>Total Hours/FTE – Night</b>								<b>66</b>	<b>1.65</b>
Weekly Total									
<b>Total Hours/FTE per week</b>								<b>202</b>	<b>5.05</b>

*\*May substitute one hour of physician time for two hours of mid-level practitioner time, or two hours of mid-level practitioner time for one hour of physician time, as necessary and with client approval.*

Our proposed staffing plan provides enhancements to the current staffing by allowing flexibility to use LVNs and RNs interchangeably within their respective licensure. This allows access to a larger pool of qualified applicants to ensure full staffing according to current market conditions. Wellpath will reconcile the cost difference between an RN and an LVN, minus any offsets for operational costs such as RN call or training.

Wellpath has kept the LCSW/MFT/Psychiatric RN position on the staffing plan with the understanding that we will reimburse Lassen County for unfilled hours in accordance with current practice.





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## VI. COST

Wellpath appreciates this opportunity to build on what has become a strong and productive relationship with Lassen County. The relationship is strong and the medical program continues to evolve. We would be honored to continue down this path of service that meets your needs by delivering quality and cost-efficient care to an underserved segment of society. We will always search for ways to work together with you to deliver quality care at the most responsible cost.

Wellpath is pleased to provide our comprehensive cost proposal for the consideration of Lassen County. We are proposing the following solutions to continue to best meet the County's specific needs. Wellpath welcomes the opportunity to discuss all aspects of our proposal in order to provide the optimal medical program for the Jail and the Juvenile Hall, now and in the future.

The following table shows the annual price for Years 1 – 5 of a new contract with Lassen County. For annual renewals beyond the initial 12-month contract period, Wellpath proposes an annual increase of 3% for each subsequent contract year.

Year 1	Year 2	Year 3	Year 4	Year 5
\$1,402,233	\$1,444,143	\$1,487,311	\$1,531,774	\$1,577,570

### Summary of Services

Wellpath will continue to provide Lassen County with a wide-ranging on-site medical program consisting of 5.05 FTEs. We will also continue to provide a full suite of off-site offerings, including ambulance, hospitalization, and other off-site and specialty services as described in this proposal.

Wellpath will also continue to provide the County with health care policies and procedures, 24-hour on-call services, medical and office supplies, medical waste disposal, comprehensive medical malpractice insurance, and corporate management and oversight.

The following table provides an at-a-glance review of our proposal:

Staffing and Services Overview for Lassen County		
Cost Proposal for July 1, 2019 to June 30, 2020		
Average Daily Population - 124		
Professional Staffing (Hours per Week)		On Call
Physician/Medical Director	0.10	✓
Health Services Administrator (RN)	1.00	
Psychiatrist	0.10	
RN/LVN	2.80	✓
LVN	0.25	
LCSW/MFT/Psych RN	0.80	✓
<b>Total Equivalent Full-Time Employees (FTEs)</b>	<b>5.05</b>	
Professional On-site Services	Included	Cap
Medical Services	✓	
Mental Health Services	✓	
On-call 24/7	✓	



Policies and Procedures	✓	
Laboratory Services	✓	
X-ray Services	✓	
Disposable Medical Supplies	✓	
Medical Waste Disposal	✓	
Basic Medical Training - Jail Staff	✓	
TB Testing for Custody Staff	✓	
Hepatitis B vaccines for staff	✓	
Comprehensive Medical Malpractice Insurance	✓	
Corporate Management and Oversight	✓	
<b>Professional Off-site Services</b>		<b>Cap</b>
Ambulance Services	✓	2
Hospitalization	✓	1
Laboratory Services	✓	1
X-ray Services	✓	1
Dental Services	✓	1
Specialty Services	✓	1
Care Management	✓	
<b>Pharmacy Services</b>		<b>Cap</b>
Complete Pharmaceutical Management	✓	
Pharmaceuticals: Over-the-Counter	✓	
Pharmaceuticals: Prescriptions	✓	
Pharmaceuticals: Mental Health/Psychotropic	✓	
Pharmaceuticals: HIV/Aids, Hepatitis, Biologicals	excluded	
<b>Caps</b>		
(1) Per Inmate Cap	\$10,000	
(2) Coverage limit of three (3) air transports per year		
<b>Annual Cost (First Year of Contract)</b>	<b>\$1,402,233</b>	

### Staffing Considerations

Our proposed staffing plan provides enhancements to the current staffing by allowing flexibility to use LVNs and RNs interchangeably within their respective licensure. This allows access to a larger pool of qualified applicants to ensure full staffing according to current market conditions. Wellpath will reconcile the cost difference between an RN and an LVN, minus any offsets for operational costs such as RN call or training.

Wellpath has kept the LCSW/MFT/Psychiatric RN position on the staffing plan with the understanding that we will reimburse Lassen County for unfilled hours in accordance with current practice.

### Population Adjustments

This proposal is based on a base average daily population (ADP) of 124 total patients. If, in any calendar month, the ADP exceeds 124, the County will pay Wellpath a per diem of \$6.27 per patient to be reconciled quarterly. This per diem is intended to cover additional costs in those instances where short-term changes in the patient population result in higher utilizations of routine supplies and services. However, the per diem is not intended to provide for any additional fixed costs, such as new staffing positions, which might prove necessary if the patient population grows significantly and if the population increase is sustained.



In such cases, Wellpath reserves the right to negotiate for a contract price increase to maintain the same high quality of care for the increased population. If the County experiences a sustained decrease in the population, Wellpath is open to discussing changes in staffing levels to better reflect the normalized population.

## ***Financial Limitations and Caps***

### **Off-Site Expenses**

Wellpath will pay for all off-site expenses, after an inmate/ward is medically cleared, physically placed, and booked into the Jail or Juvenile Hall, with the only exception being off-site psychiatric inpatient hospitalizations or medical clearances required for psychiatric inpatient hospitalizations. All medical hospital-based or outpatient surgery individual episodes are subject to a \$10,000 catastrophic cap.

### **Pharmacy**

Our proposal includes comprehensive pharmacy services and management, including medication management, prescribing, filling, dispensing, administration, recordkeeping, reporting and invoicing, and quality assurance. Wellpath will maintain responsibility for all pharmaceutical costs, with the exception of certain specialty medications identified in the RFP and in the summary table above.

### **Air Transportation**

Wellpath will maintain responsibility for the cost of emergency ambulance transportation. Emergency helicopter transportation costs to off-site health care providers will be Wellpath's responsibility up to a limit of three trips per contract year.

## ***Contract Length***

Wellpath understands that the initial contract shall be in effect from July 1, 2019 through June 30, 2022. Wellpath requests that there will be mutual options to renew the contract for two additional one-year periods beginning July 1, 2022 through June 30, 2023 and July 1, 2023 through June 30, 2024.

## ***Pricing Assumptions***

The proposed prices reflect the scope of care as outlined in our technical proposal, in the RFP requirements, and based on the current community standard of care with regard to correctional health care 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 increase in costs, coverage of costs related to such changes are not included in this proposal and may need to be negotiated with Lassen County.



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VII. IDENTIFICATION OF SUBCONTRACTORS

Wellpath will continue to partner with the following subcontractors to provide various ancillary services for the Jail and Juvenile Hall:

Subcontractor	Services Provided	Percentage of SOW Performed
Correct Rx	Pharmacy services	3.18%
BioReference	Laboratory services	0.28%
Stericycle	Waste disposal services	0.26%



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## VIII. COUNTY MODEL AGREEMENT AND INSURANCE

Wellpath has reviewed and is prepared to utilize the County's Model Agreement format, save for the items noted in section **III.10. Exceptions**. We will continue to maintain the required insurance coverage for Lassen County.



In accordance with the California Uniform Trade Secrets Act (California Civil Code Section 3426 et seq.) and the California Evidence Code (California Evidence Code Section 1030) concerning trade secret privilege protection and confidential commercial information protection, Wellpath respectfully request that the attachments labeled TRADE SECRET be redacted from any distribution of this proposal pursuant to request under the California Public records Act, or for any other reason.





RFP MEDICAL SCORING SHEET  
(See RFP pages 23-24)

PROPOSAL/FIRM: WELLPATH

REVIEWER: J BRANNING

DATE: 3/7/19

No.	Written Proposal Evaluation, Part A	Rating Scale Low-High	Comments
1	Contractor Experience	0 1 2 3 4 <u>5</u>	4 YEARS IN COUNTY.
2	Service Experience	0 1 2 3 4 <u>5</u>	4 YEARS AT JDF
3	Years providing service in California	0 1 2 3 4 <u>5</u>	
4	Client Satisfaction	0 1 2 3 4 <u>5</u>	DEALING W/ DIFFICULT YOUTH WITH A VARIETY OF NEEDS GREAT
5	Contingent or geography to other vendor operated facilities for purposes of medical	0 1 2 3 4 <u>5</u>	WORKS WELL WITH PARTNERING COUNTIES USING SERVICES
6	Management of Firm	0 1 2 3 <u>4</u> 5	
7	Transition Plan	0 1 2 3 4 5	CURRENT PROVIDER, ON BOARDING WAS GREAT WITH INITIAL CONTRACT
8	Exceptions to RFP	0 1 2 3 <u>4</u> 5	CONSIDERATE OF RURAL COUNTY POPULATION CHANGES
9	Overall Plan to provide services (0 low -10 high-points)	7.5	CONSIDERATE OF UNIQUE NEEDS OF THE POPULATION SERVED
9a	Plan for Jail Services	0 1 2 3 <u>4</u> 5	MEETS REQUIREMENTS
9b	Plan of Juvenile Hall Services	0 1 2 3 <u>4</u> 5	MEETS REQUIREMENTS
10	Staffing Plan	0 1 2 <u>3</u> 4 5	INCREASED FTE AND COST LUN ADDITION
11	Cost (overall)	0 1 2 <u>3</u> 4 5	DOUBLED COST OF PER DIEM YEARLY INCREASE IS HIGH
11a	Cost, Jail	0 1 2 <u>3</u> 4 5	INCREASED W/ NO DATA BACKUP
11b	Cost, Juvenile Hall	0 <u>1</u> 2 3 4 5	WAS NOT BROKEN DOWN BY FACILITY
12	Overall Quality of RFP response (0 low -10 high-points)	9	PROFESSIONAL SERVICES TRANSPARENT
13	Suggested Alternate Proposal(s) (0 low -10 high-points)	7.5	ABILITY TO RENEW 2 YEARS INSTEAD OF RFP.
	<b>TOTAL:</b>	<b>75</b>	MAX of 100 Pts.

\* NEED TO INCLUDE YVONNE SMITH TO SEE IF RURAL HEALTH CARE \$ WILL COVER.



RFP MEDICAL SCORING SHEET  
(See RFP pages 23-24)

PROPOSAL/FIRM: WELLPATH

REVIEWER: J BRANNING

DATE: 3/7/19

Rating		Assessment
0	Not Acceptable	Non-responsive, fails to meet RFP specifications. The approach has no probability of success. For mandatory requirement this score will result in disqualification of proposal.
1	Poor	Below average, falls short of expectations, is substandard to that which is the average or expected norm, has a low probability of success in achieving project objectives per RFP.
2	Fair	Has a reasonable probability of success, however, some objectives may not be met.
3	Average	Acceptable, achieves all objectives in a reasonable fashion per RFP specification. This will be the baseline score for each item with adjustments based on interpretation of proposal by Evaluation Committee members.
4	Above Average/Good	Very good probability of success, better than that which is average or expected as the norm. Achieves all objectives per RFP requirements and expectations.
5	Excellent/Exceptional	Exceeds expectations, very innovative, clearly superior to that which is average or expected as the norm. Excellent probability of success and in achieving all objectives and meeting RFP specification.





**RFP MEDICAL SCORING SHEET**  
(See RFP pages 23-24)

PROPOSAL/FIRM: WELPATH c/o CFMG

REVIEWER: T. SHAW

DATE: 3-6-19

No.	Written Proposal Evaluation, Part A	Rating Scale Low-High	Comments
1	Contractor Experience	0 1 2 3 4 <u>5</u>	4 IN CASSON COUNTY ACCREDITATION DISTRICTS
2	Service Experience	0 1 2 3 4 <u>5</u>	4- IN CASSON CO. 300,000 IN 36 MONTHS 20,000 INMATES 34 COUNTIES
3	Years providing service in California	0 1 2 3 4 <u>5</u>	12 CO FOR 24 YRS 23 FOR 10 YRS
4	Client Satisfaction	0 1 2 3 4 <u>5</u>	DEFER SCORE TO SHERIFF CARE TO REFERENCES
5	Contingent or geography to other vendor operated facilities for purposes of medical	0 1 2 <u>3</u> 4 5	Redding Butte
6	Management of Firm	0 1 2 3 <u>4</u> 5	RECENT COMBINATION OF CCS & CMGC
7	Transition Plan	0 1 2 3 <u>4</u> 5	CURRENT PROVIDER
8	Exceptions to RFP	0 1 2 <u>3</u> 4 5	OPEN TO NEGOTIATE
9	Overall Plan to provide services (0 low -10 high-points)	<u>6</u>	ACKNOWLEDGES WANTING TO PROVIDE "WILL CONTINUE" MEDICAL HEALTH
9a	Plan for Jail Services	0 1 2 <u>3</u> 4 5	SEEMS TO MEET RFP REQ.
9b	Plan of Juvenile Hall Services	0 1 2 <u>3</u> 4 5	SEEMS TO MEET RFP REQ.
10	Staffing Plan	0 1 2 <u>3</u> 4 5	INCREASE 0.25 FTE 10 HRS LUN. How does that work FOR J.U.?
11	Cost (overall) <u>↑ 272K INCREASE</u>	0 1 2 <u>3</u> 4 5	PRICE ASSUMPT MAY BE NEW 3% Adj Annually Seems High
11a	Cost, Jail <u>vs 3.06</u> <u>per diem 6.27 ↑ 3.21 INCREASE</u>	0 1 2 <u>3</u> 4 5	
11b	Cost, Juvenile Hall	<u>0</u> 1 2 3 4 5	NOT PROVIDED?
12	Overall Quality of RFP response (0 low -10 high-points)	<u>9</u>	PROFESSIONAL - PREPARED OPEN BOOK, EASY TO UNDERSTAND INCLUDES CITATIONS FIRST & CLEAR
13	Suggested Alternate Proposal(s) (0 low -10 high-points)	<u>6</u>	OPTION TO RENEW 2 - ONE YEAR
	<b>TOTAL:</b>	<u>70</u>	MAX of 100 Pts.

- ANNUAL COST EXISTING? AOP EXISTING? Per diem > EXISTING?
  - TIMELY, Good Communication, inspections
  - BEHAVIOR & HEALTH? - Litigation in CASSON? 1
- \$1,129,737 Current      AOP 120 \$3.06



RFP MEDICAL SCORING SHEET  
(See RFP pages 23-24)

PROPOSAL/FIRM: WELLPATH

REVIEWER: JOHN MCGARMA

DATE: 3-7-19

No.	Written Proposal Evaluation, Part A	Rating Scale Low-High	Comments
1	Contractor Experience	0 1 2 3 4 <u>5</u>	CCS-2003 - 16 YRS CMCC-1983 - 36 YRS
2	Service Experience	0 1 2 3 4 <u>5</u>	35 YRS IN BUSINESS
3	Years providing service in California	0 1 2 3 <u>4</u> 5	4 IN LASSEN 20+ YRS IN CA.
4	Client Satisfaction	0 1 2 3 <u>4</u> 5	
5	Contingent or geography to other vendor operated facilities for purposes of medical	0 1 2 3 <u>4</u> 5	SHASTA/BUTTE / GLENN
6	Management of Firm	0 1 2 3 <u>4</u> 5	RECENT MERGER + CURRENTLY IN TRANSITION PHASE
7	Transition Plan	0 1 2 3 4 <u>5</u>	CURRENT PROVIDER - NO TRANSITION
8	Exceptions to RFP	0 1 2 <u>3</u> 4 5	\$6.75 PER DIEM IS DOUBLE CURRENT RATE OF \$3.00 PER 'M
9	Overall Plan to provide services (0 low -10 high-points)	<u>7</u>	PROVIDER HAS HIGH TURNOVER RESULTING IN A LACK OF PERSONNEL CONTINUITY
9a	Plan for Jail Services	0 1 2 <u>3</u> 4 5	
9b	Plan of Juvenile Hall Services	0 1 2 <u>3</u> 4 5	
10	Staffing Plan	0 1 2 <u>3</u> 4 5	WHY CHANGE IN LUN HAS? LACK OF RN APPS?
11	Cost (overall)	0 1 2 <u>3</u> 4 5	WHY INCREASE BY 27% + PER DIEM RATE
11a	Cost, Jail	<del>0 1 2 3 4 5</del>	↓
11b	Cost, Juvenile Hall	<del>0 1 2 3 4 5</del>	
12	Overall Quality of RFP response (0 low -10 high-points)	<u>9</u>	WELL ORGANIZED + PREPARED
13	Suggested Alternate Proposal(s) (0 low -10 high-points)	<u>7</u>	3 YR W/ 2 1-YR OPTIONS
	<b>TOTAL:</b>	<u>76</u>	MAX of 100 Pts.

