



 **wellpath**[®]
To hope and healing.

2021 Corporate Responsibility Report





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Chapter 1

Purpose



“One person caring about another represents life’s greatest value.”
– Jim Rohn

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The Path We Are On

As I reflect on the road we have traveled and the road ahead, I am pleased that, when faced with adversity, we remain true to our mission—to provide quality care to every patient with compassion, collaboration, and innovation.

This year I signed the CEO Action for Diversity & Inclusion™. We are proud of our team members who reflect the populations we serve, and of our enthusiasm to continue improving in this area. Ours is an environment where every person is treated with respect, dignity, and compassion.

Providing quality care starts with compassion, which is empathy in action. It requires understanding how everyone's unique circumstances affect their health and quality of life. For that reason, we partnered with Healthify to better understand our patients. Healthify's platform enables us to identify our patients' social needs, find resources, and access social services to assist in their transition from our care. Through our Wellpath Cares Foundation, we are supporting the Morehouse School of Medicine's work to better understand Social Determinants of Health (SDoH) as well as educate the next generation of justice-served public health leaders.

Success in the work we do requires collaboration with community and governmental organizations. When patients need treatment outside of our facilities, they are sent to one of approximately 14,000 community providers in our nationwide network. We partner with government agencies to provide oversight and direction in the delivery of care in our shared environments. In 2021, we welcomed multiple local government agencies and two state departments of corrections (DOCs) as new Wellpath partners. Our performance and alignment around reducing recidivism and providing quality care has earned us the opportunity to continue our partnerships year after year. In fact, 95% of our government partners have worked with us for multiple years.

In 2021, the Delta and Omicron variants presented ongoing challenges, but the development of the coronavirus disease 2019

(COVID-19) vaccine was an example of transformative innovation. We encouraged our people, partners, and patients to get vaccinated, and in September, our team member vaccination rate was 10% higher than the national average. We also continue to recommend and provide a vaccine to all patients when they enter our care.

Among other challenges were the Great Resignation and continued global supply chain issues. As you will see in this year's report, we acted boldly to face these issues head-on. Our solutions build on our foundation and increase our pool of potential healthcare providers while improving our quality of patient care. These include further development of our telehealth platform, the Wellpath Healthcare Cloud, implementation of our Travel Nurse Program and alternative staffing models, use of our central warehouse in St. Louis for distribution of personal protective equipment (PPE), and a \$21.3 million dollar increase in pay for our team members.

As important as the path we are on, are the people with whom we travel. I am proud of our dedicated team members who provide hope and healing to patients. Meeting our nurses, doctors, and support staff is a humbling experience and reveals how each one is motivated by their concern for others. I am proud of the resilience we demonstrated in navigating this journey together, and of the direction we are heading. My thanks go out to each member of the Wellpath family for your incredible work and leadership in challenging times.

To hope and healing.

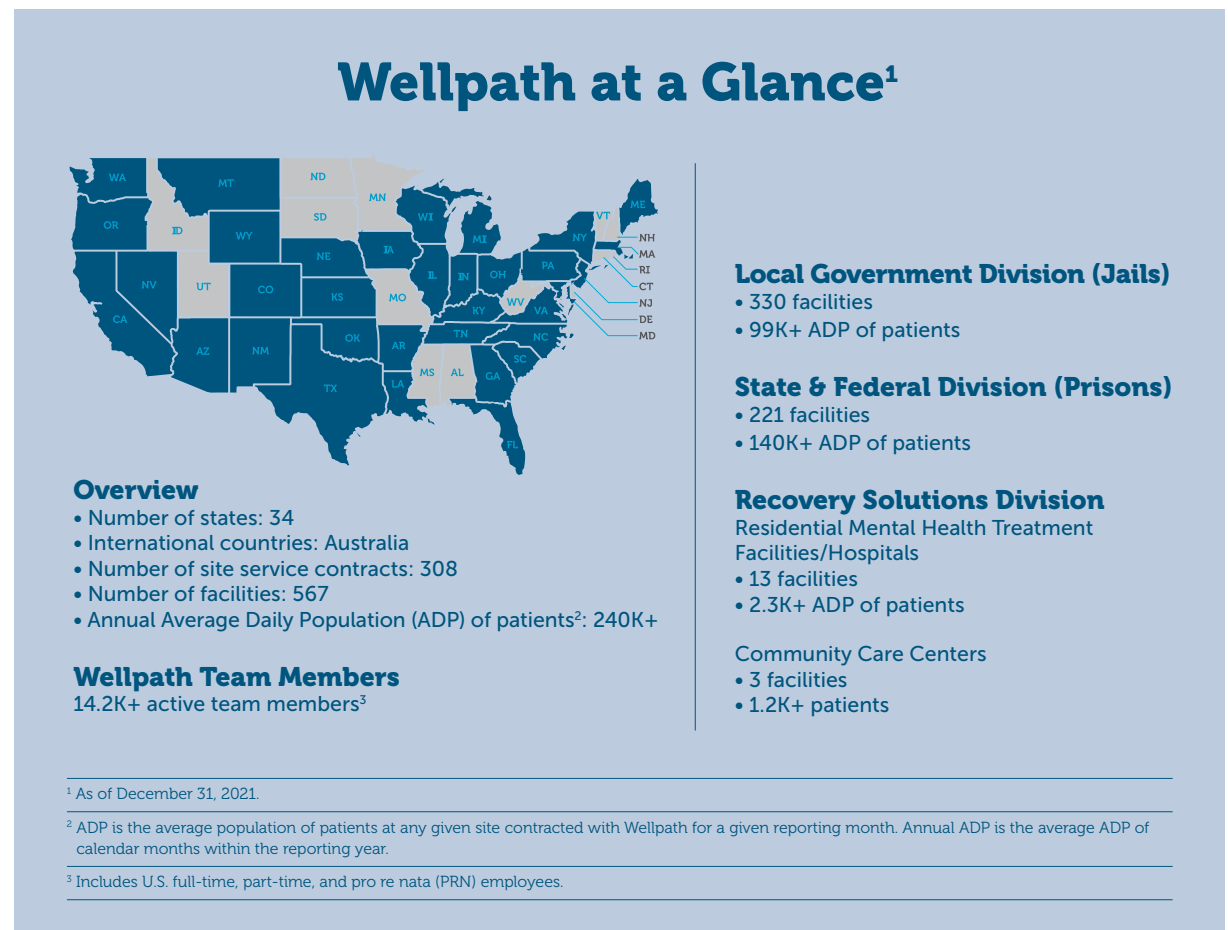
Jorge Dominicus
Chief Executive Officer and Chairman of the Board

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

Where We Provide Care

Wellpath provides care in four primary types of facilities:

- Jails** – Our Local Government division provides healthcare in local county/parish jails and juvenile detention facilities.
- Prisons** – Our State and Federal division provides healthcare in state and federal prisons and juvenile justice residential facilities.
- Residential Mental Health Treatment Facilities** – Our Recovery Solutions division provides care in residential mental health treatment facilities and behavioral health/neuropsychiatric hospitals.
- Community Care Centers** – Our Community Care Centers provide medication-assisted treatment (MAT) for patients challenged with substance use disorder (SUD) and behavioral health disorders.





Nine Things to Know About Wellpath

- 1. Wellpath is exclusively a healthcare services company.** Federal, state, and local legislatures, elected officials, and the judiciary establish criminal justice policy and administer justice. We neither participate in the disposition of criminal justice nor own or operate correctional facilities where we provide healthcare services. Wellpath primarily serves patients that are the responsibility of government agencies. By the end of 2021, our few remaining contracts with private prison operators were terminated.
- 2. Wellpath does not benefit from higher incarceration rates and our profits do not increase as facility incarcerations increase.** Our contracts are generally structured to avoid financial benefit from inmate fluctuations. Reimbursement changes only cover costs that rise or fall with the population, such as supplies, pharmaceuticals, and off-site services. Our contracts often include a modest per diem payment or credit to reflect fluctuating costs. We calculate the per diem amount to approximately equal the increase or decrease in variable cost that accompanies an increase or decrease in the patient population. We prefer contracts that align with patient and societal interests.
- 3. Wellpath always prioritizes patients over profit.** Our business is grounded in providing excellent service to patients and adding value for our government partners. The health of our business rests solely on our patients' health, partner satisfaction, and the belief of our people in our mission. Cutting corners to reduce cost at the expense of any of these hurts Wellpath and increases business risk. Great patient care helps patients and communities, lowers risk, improves partnerships, and supports growth. Poor patient care can lead to opposite outcomes. To demonstrate our commitment to avoid business practices that inappropriately incentivize profit, we annually donate income from operations exceeding 5% of revenue to not-for-profit organizations that address SDoH and health equity.
- 4. Wellpath patients receive the right care in the right place.** A hallmark of our healthcare philosophy is that patients receive the appropriate level of care in the appropriate place, even when that requires sending patients outside of our facilities. In 2021, we worked with more than 38,000 unique providers. More than half of those providers are

PURPOSE

contracted directly with Wellpath or were accessed through a shared network agreement.

5. **Our team members are committed to avoiding unsatisfactory clinical outcomes.** Considering the approximate eight million interactions we have each year with patients who are among the sickest, most fragile in any setting, bad outcomes are rare. Like any large healthcare system, Wellpath comprises over 14,000 people who do difficult work in challenging settings, and unfortunate situations and outcomes sometimes occur. In this, Wellpath is not alone. We strive to provide quality care to every patient and invest in hiring, training, planning, and developing processes, policies, and procedures to achieve our important goal.
6. **Collaboration is not just a part of our mission; it is critical to providing healthcare in a correctional facility.** Wellpath team members are guests in a correctional facility; we rely on close collaboration with corrections staff to do our job. Furthermore, jails and prisons are designed to safely hold incarcerated people; in general, they were not designed primarily for providing healthcare services. In most cases, for our healthcare staff to see a patient, a correctional officer must be available to retrieve and supervise the patient throughout their interaction.
7. **Correctional healthcare is vastly different from community medicine.** The settings we serve are far more challenging than those found in the community, and we serve a patient population far different from typical community healthcare settings. Consider the following:
 - **Mental Health** – One in five adults in the community experiences mental health issues each year¹, whereas about 40% of Wellpath patients in jails and prisons have a history of mental illness². In our

Recovery Solutions facilities, that number rises to 100%. Newly incarcerated patients are uniquely vulnerable and fragile at the time of care and often are in extreme emotional crisis. We offer a range of mental health services from intake to discharge planning to provide short and long-term solutions for those suffering from various mental health issues.

- **SUD and MAT** – An estimated 65% of our patient population has a substance abuse disorder³, compared to 10% of Americans⁴. We offer patients detox, MAT, and substance abuse programs for their addictions. Our WCCCs provide MAT services for continuity of care after discharge.
 - **SDoH** – Having shelter is a major contributor to an individual's overall health. We estimate that 10% of incarcerated patients experience homelessness⁵ That compares to 0.18% for the U.S. population.⁶ Our discharge planning helps connect patients with government programs and healthcare providers to reduce this SDoH.
8. **Wellpath works to hire incumbent staff when it becomes the healthcare provider at a new facility.** When Wellpath enters a new partnership, we intend to retain incumbent staff who are otherwise qualified, and who meet Wellpath's pre-hire requirements. Wellpath works with facility leaders to offer "right of first refusal" interviews to current non-management team members in accordance with this philosophy. We want to retain and retrain as many incumbent staff members as possible with equal or higher pay and we offer benefits on day one.
 9. **Wellpath has positive labor relations.** Wellpath has worked with collective bargaining unions since 1998. We have a positive relationship with current unions, from California to Florida and in Australia. We support fair and consistent practices for all team members.

¹ https://www.nami.org/NAMI/media/NAMI-Media/Infographics/NAMI_2020MH_ByTheNumbers_Adults-r.pdf

² https://www.nami.org/NAMI/media/NAMI-Media/Infographics/NAMI_CriminalJusticeSystem-v5.pdf

³ <https://nida.nih.gov/publications/drugfacts/criminal-justice#:~:text=While%20the%20exact%20rates%20of,population%20has%20an%20active%20SUD.>

⁴ <https://www.nih.gov/news-events/news-releases/10-percent-us-adults-have-drug-use-disorder-some-point-their-lives>

⁵ Council of State Governments, 2016: <https://www.voa.org/homelessness-and-prisoner-reentry>

⁶ <https://www.huduser.gov/portal/sites/default/files/pdf/2020-AHAR-Part-1.pdf>



Leadership in Challenging Times

COVID-19 in 2021

In December 2020, the Federal Drug Administration (FDA) issued an Emergency Use Authorization for the first COVID-19 vaccines. In the early months of 2021, vaccination capacity rapidly increased. By April 2021, any American eligible for the vaccine could easily obtain it.¹ By August 1st, 58% of Americans had received at least one dose of a vaccine.² Unfortunately, vaccinations stalled, and the Delta variant killed more than 130,000 Americans from August through October.

In December, the new Omicron variant reached the United States (U.S.). Highly transmissible, it drove daily case rates to new highs, with a peak of nearly 600,000 by year's end. Its high case count led to a peak daily death rate in excess of 2,000. By December of 2021, the Centers for Disease Control and Prevention (CDC) reported that unvaccinated people were 20 times more likely to die of COVID-19.³

Multiple COVID-19 waves raised the stress level in an already stressed nursing labor pool. An October 2021 survey by the American Nurses Foundation found that 42% of respondents reported an extremely stressful, disturbing, or traumatic experience due to COVID-19.⁴

A Generational Nursing Crisis

During 2021, many nurses and other healthcare workers said, "enough!," joining what's been called the "Great Resignation," and creating the first true decline in working nurses in a generation. Compounding the effect of this, many nurses left the regular workforce to become travel nurses, drawn by temporary compensation sometimes exceeding \$10,000 per week. This was an unintended consequence of the Coronavirus Aid, Relief, and Economic Security (CARES) Act and follow-on legislation, which provided some \$178 billion in funding to hospitals and other providers, but was not made available to healthcare professionals in our environments.

Impact of the CARES Act

The CARES Act allowed hospitals to pay as much as an extra \$95 per hour to employed nurses and uncapped rates to nursing agencies and travel nurses to secure talent. This created a frenzy of hospital temporary nurse wage increases (exacerbated by astronomical sign-on bonuses and shift differentials). As a result, many Wellpath nurses were attracted to work outside the company, further complicating our ability to attract and retain nurses. This crisis didn't just happen; it has been decades in the making. The aging of America has increased demand for nurses, a trend that will continue as the population continues to grow older.

Opioid Epidemic

In the first half of 2021, there were more overdose related deaths than ever before. An increase in drug use, lethal synthetic opioids, and isolation and social distancing restrictions contributed greatly to the problem.⁵ The opioid epidemic is felt by many of our patients. It is estimated that nearly 2/3 of people in jails and prisons are dealing with SUD. While there is momentum from lawmakers and community leaders to increase MAT programs throughout the country, a study from the National Academy of Sciences reported that only 5% of people with opioid use disorder in justice environments received medication treatment.⁶

Kronos Outage

In December, Human Resources (HR) management company Ultimate Kronos Group (UKG) was hit by a ransomware attack that directly affected over 2,000 businesses worldwide that rely on Kronos for issuing paychecks. While the outage did not compromise Wellpath data, it did affect our ability to process payroll, handle time sheets, and manage our workforce.

¹ <https://www.usatoday.com/in-depth/news/health/2021/04/19/covid-vaccine-tracker-available-widely-hesitant-cy/7187382002/>

² <https://usafacts.org/visualizations/covid-vaccine-tracker-states/>

³ <https://www.thedenverchannel.com/news/national/coronavirus/unvaccinated-people-20-times-more-likely-to-die-of-covid-cdc-says>

⁴ <https://www.nursingworld.org/~4aa484/globalassets/docs/ancc/magnet/mh3-written-report-final.pdf>

⁵ <https://www.commonwealthfund.org/blog/2022/overdose-deaths-surged-first-half-2021-underscoring-urgent-need-action>

⁶ <https://nap.nationalacademies.org/catalog/25310/medications-for-opioid-use-disorder-save-lives>

Our Response

Effective Patient Care

Our justice-involved patients have a constitutional right to receive appropriate healthcare. Respectful of this right, and respectful of the special needs of our vulnerable and medically complex populations, we take our responsibility to deliver quality care seriously, even in the face of extreme circumstances. In 2021, our front-line healthcare workers and leaders dug even deeper than in 2020 and delivered care that mirrored community trends in terms of COVID related datapoints. Our ever-improving care, which included vaccinations, testing, medications, quarantine, and isolation, resulted in a 41%¹ reduction in average weekly COVID-19-related hospital admissions from 2020.

Allocated Resources

In 2021, we invested an additional \$21.3M toward our people. This included bonuses, temporary pay increases, and our Financial Outreach to Clinics Under Stress (F.O.C.U.S.) initiative. These bonuses, wage increases, and temporary differentials in cooperation with our custody agency partners supplemented base compensation for nurses in many of our locations. We offered one-time bonuses to site leaders, such as health service administrators (HSAs), directors of nursing, and regional directors of operations (RDOs), to recognize their extraordinary commitment. We created “the new normal” for healthcare employment by adjusting team member wages and moving them into the top quartile for compensation whenever possible. In addition to our other initiatives, our F.O.C.U.S. dollars are specifically targeted to increase pay differentials and bonuses to nurses and other essential team members in our most affected commu-

nities. We distributed \$6.8 million in December 2021 through this initiative, which will continue into 2022.

Alternative Staffing Models

Correctional healthcare providers, like Wellpath, were not eligible for CARES Act funding, and therefore needed to take action to ensure we had the talent necessary to provide quality care to our patients. Wellpath is executing a multi-pronged strategy that includes the development of alternative staffing models. Employing a wide range of care providers to expand service capacity of nursing teams like medication administration, vital sign collection, electrocardiogram (EKG), and phlebotomy, is a key strategy in developing alternative staffing models.

Our alternative staffing models are compliant with state laws and regulations and mirror trends seen in recent years in the medical profession (for instance, the delegation of duties to non-nurse surgical technologists, etc.). When developing these models, we kept a keen focus on patient safety and quality of care while working to expand the pool of employees available to provide care during these extraordinary times. Wellpath is also continuing to develop a “super floater” pool of internal travel nurses to support clinics. We have also expanded the capabilities and use of our Wellpath Healthcare Cloud, reducing the reliance on locally scarce labor where possible. Wellpath Now, which is part of the Wellpath Healthcare Cloud, enables our patients in critical condition to be seen by an emergency department (ED) provider in approximately five minutes.² This wait is drastically less than in a typical ED setting. Combining our telehealth encounters and online specialty referral consults, our remote provider teams conducted more than 480,000 telehealth interactions in 2021.



\$28.7M

invested in COVID-19 relief initiatives

Increasing Access to Treatment

Addiction is a disease, not a crime. For people with opioid use disorder, MAT is a clinically effective treatment which involves a combination of counselling and clinically proven medications such as buprenorphine, methadone, and naltrexone. In 2021, we worked with our partners to begin or expand MAT programs in their facilities. Approximately 50% of our local government partners with MAT capabilities have expanded their programs to allow for the diagnosis and treatment of new patients. Additionally, we prepared to open three new WCCCs in 2022 to be able to seamlessly provide continuity of care and continuation of MAT treatment to our patients after they leave justice-involved facilities.

Kronos Incident Response

In response to the Kronos outage, nearly overnight, a multi-disciplinary team made up of 40+ key Wellpath leaders from HR, Payroll, Information Technology (IT), Legal/Risk and Communications, worked around the clock, foregoing their holiday vacations, to rapidly stand-up alternative, in-house timekeeping and payroll systems to ensure team members received their paychecks. This tremendous team effort enabled us to process approximately 27,000 payments by hand.

¹ Calculated using data from sites managed by our Electronic Records Management Application (ERMA) Care Management (CM), which includes >80% of our ADP.

² Wellpath Now average wait time to be seen by a provider is approximately five minutes.



Reducing Recidivism and Improving Health Equity

Each year, Wellpath engages in approximately eight million interactions with some of the nation's most vulnerable and often overlooked patients. Many of our patients have experienced severe trauma, neglect, and poor living conditions. We set out every day to help those who need it most and to break the cycle of recidivism and improve health equity. Every patient should have the opportunity to be healthy, regardless of social strata. Health inequities are reflected in differences in lifespan; quality of life; rates of disease, disability, and death; severity of disease; and access to treatment. We also focus on SDoH, the conditions in the places where our patients live, learn, work, and play, that affect a range of health risks and outcomes. Our goal is to help our patients improve their health and quality of life so that they will leave, start anew, and never need to return.

Wellpath Cares Foundation

In 2021, our Board of Managers (The Board) authorized the establishment of the Wellpath Cares Foundation. This tax-exempt non-operating independent foundation is affiliated with and funded by Wellpath. The Foundation makes

grants to non-profit charitable organizations which address disparities of care that help reduce the impact of SDoH and improve the lives and healthcare of vulnerable populations. In 2021, Wellpath donated \$1 million and provided substantial in-kind support to the Foundation.

Wellpath donated \$1 million and provided substantial in-kind support to the Foundation.

As of December 31, 2021, the Foundation's Board of Directors approved donations to two programs run by the Morehouse School of Medicine in Georgia, one of four historically Black medical schools in the U.S. The Foundation provided funds to the Master's of Administration in Justice-Involved Care (MAJIC) Program and the

Kennedy-Satcher Center for Mental Health Equity (KSCMHE).

The MAJIC program offers a master's degree in Justice-Involved Care and an affiliated Justice-Involved Life Coach Certification to corrections professionals, which teaches students how to reduce recidivism, promote rehabilitation, and support justice-involved individuals.

The KSCMHE is producing a series of webinars focusing on care of incarcerated individuals and improving mental health, substance abuse, and health equity services to formerly incarcerated individuals to reduce recidivism.





Healthify Partnership

A key to lowering recidivism is the successful discharge transition of our patients to critical community services, such as housing, employment, substance abuse treatment, and mental health services. In 2021, Wellpath proudly partnered with Healthify, a leader in analyzing SDoH patient data, to identify appropriate and accountable community-based organizations and create plans to meet the social needs of our discharged patients. Healthify takes a deep dive into the social service landscape in each community to develop strong relationships with local organizations.

Our goals in partnering with Healthify are to reduce recidivism and improve health equity by:

- Using Healthify assessment tools to establish a baseline of SDoH needs.
- Improving visibility in post-discharge social service utilization and referrals.
- Improving social risk assessments by providing a common assessment tool, with as much integration into our Electronic Health Record (EHR) as possible to streamline assessment workflow.

- Improving navigation to social services by using Healthify’s social service directory of community-based organizations.

Access to Care

Wellpath continues to invest in communities throughout the country to expand access to quality healthcare. Wellpath Community Care Centers (WCCCs) provide evidence-based MAT and SUD programs for individuals struggling with addiction to opioids or other substances, including alcohol, methamphetamine, cocaine, hallucinogens, and tobacco. These services are available to anyone in the community, with a special emphasis on providing continuity of care for justice-served patients after release from jail or prison.

Additionally, in 2021, we broke ground on our first neurobehavioral hospital in Palm Beach, Florida. At this facility, each patient will be provided with holistic behavioral healthcare using a fully integrated interdisciplinary team approach. The team’s goal is to consider the individual complexities of each patient and personalize treatment plans for optimum outcomes. Two hospitals will open in 2022 and serve patients from the community.

About This Report

This report demonstrates our public commitment to our mantra – “Always Do The Right Thing” for our people, patients, partners, and planet. We have organized this year’s report into eight chapters as we did last year. These include Purpose, Pandemic, Patients, People, Partners, Process, Planet, and Performance. We have identified the environmental, social, and governance (ESG) risks and issues most significant to Wellpath and our key stakeholders to create this report and reaffirm our commitment to this process. We will continue our focus on transparency; not only in areas where we excel, but also where we experience challenges, as a way to hold ourselves accountable to our mission and vision.

Our responsibility for patient care almost always includes the direct provision of on-site care (physician, nursing, pharmacy, labs, and testing). This responsibility typically extends to coordinating and managing off-site medical services, including in-patient hospitalizations. For these off-site cases, we develop and manage a network of providers in the community to provide services, manage claims, and process timely payments to providers.

Our Local Government and State and Federal divisions feature correctional healthcare operations consisting of on-site care in residential justice-served facilities, including jails and prisons. This care may include somatic, mental, and dental healthcare. Providing care in these environments requires coordination with custody, food service, maintenance, and other staff that are not Wellpath team members. Wellpath does not own these facilities; we are the partner that delivers and/or facilitates the delivery of health-care treatment to patients.

Our Recovery Solutions division provides care in residential, forensic treatment facilities, government-sponsored civil commitment mental health

facilities, neurobehavioral hospitals, and community care centers. Services can include outpatient substance use disorder treatment, mental health treatment, and patient-centered healthcare navigation support. We provide food service, maintenance, safety, and off-site care as needed.

Our international operations includes Correct Care Australasia which provides care for adult and juvenile offenders at 16 locations in Australia. It has operated for over 20 years.

We established the disclosure topics included in this report by considering material issues defined in the Value Reporting Foundation’s (VRF) Sustainability Accounting Standards Board (SASB) standards for the Health Care Delivery and Managed Care industries and the United Nations Sustainable Development Goals (UNSDGs). We used these standards and frameworks for assessing the material risks and opportunities for our company. While the contents of this report have not been externally assured, they have been reviewed and approved by management and our ESG Steering Committee.



UNSDGs



Our mission also supports the UNSDGs which explicitly call on all businesses to apply their creativity and innovation to solve sustainable development challenges. We have reviewed the 17 goals supporting peace and prosperity for people and for the planet. We are aligned on all and we have found business relevance on six, as illustrated below. Wellpath is committed to prioritizing these and will continue to update in future reports.

<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>Ensure healthy lives and promote well-being for all at all ages</p> <p>Wellpath key issue(s): Team member health and well-being, quality patient care, mental health, patient safety, suicide prevention and awareness, substance abuse and MAT, and COVID-19 response</p>	<p>4 QUALITY EDUCATION</p> 	<p>Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all</p> <p>Wellpath key issue(s): Team member development and engagement, academic affiliations, and philanthropic efforts</p>
<p>5 GENDER EQUALITY</p> 	<p>Achieve gender equality and empower all women and girls</p> <p>Wellpath key issue(s): Diversity and inclusion</p>	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all</p> <p>Wellpath key issue(s): Team member health and well-being, team member development and engagement, talent acquisition and retention, and successful partnerships</p>
<p>10 REDUCED INEQUALITIES</p> 	<p>Reduce inequality within and among countries</p> <p>Wellpath key issue(s): SDoH and recidivism reduction</p>	<p>16 PEACE, JUSTICE AND STRONG INSTITUTIONS</p> 	<p>Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels</p> <p>Wellpath key issue(s): SDoH and recidivism reduction</p>

Material Topics


We identified material ESG topics by understanding the needs and perspectives of our people, patients, partners, and other key stakeholders. We performed a peer benchmarking and industry landscape assessment to establish our universe of material risks and topics for inclusion in this report. This report includes the following ESG pillars:

- **Environment** – Planet
- **Social** – Patients, People, and Partners
- **Governance** – Process


This report accurately reflects the general information and concepts presented. However, it does not convey every criterion of care or patient outcome on a granular level, nor is it an exhaustive listing of our services, commitments, or business operations. We prepared this report utilizing our usual accounting methods, but we do not represent that we utilized generally accepted accounting principals (GAAP) data.

Our materiality matrix depicts a summary of our 2021 materiality assessment. We will continue to engage key stakeholders through patient, team member, and partner surveys, and investor and board dialogue for periodic updates.






74.6%
team member vaccination rate as of September 2021¹



0
data breaches involving patient, people, or partner information



480K+
telehealth interactions



\$1M
donated to the Wellpath Cares Foundation

2021 HIGHLIGHTS




\$202K
distributed to team members through our Dare2Care program



2.5K+
electronic assets recycled




78.1%
of our workforce is female



\$28.7M
invested in COVID-19 relief initiatives




700+
incumbent team members retained from new contracts



41%
reduction in COVID-19 weekly hospital admissions from the previous year²



1K+
internal promotions



105
compliance incident reports investigated and closed



401
patient lives saved with Narcan®

¹ Self-reported as of September 2021 based on a 79.8% participation rate.

² Calculated using data from sites managed by our ERMA CM which includes >80% of our ADP.



COVID-19 Response

2021 Key Milestones and Events

Response at a Glance

Case Study

Chapter 2

Pandemic



“Never give up, for that is just the place and time that the tide will turn.”
– Harriet Beecher Stowe

PADEMIC

The COVID-19 pandemic has been a formidable challenge for the healthcare industry, especially correctional healthcare. We have learned much over the past two years and the learning continues. We understand the importance of testing, social distancing, masking, and protecting our supply chain. The Wellpath strategy has been tested and passed, even through the uncertainties that accompanied the Delta and Omicron variants. We have incorporated this experiential knowledge into our ongoing infectious disease

management procedures. We continue to rely on sustained, informed, and aggressive leadership on our path to protect the health of our patients, partners, and people.

Wellpath follows guidance from the CDC and state governments to maintain a high state of readiness to act while providing the best outcomes for our patients and the resources needed to maintain the highest standards.



COVID-19 Response

In 2021, our COVID-19 response was steadfast. We required and provided N95 masks for our front-line workers, continued to practice social distancing as much as possible in a correctional environment, and maintained close awareness of new and current COVID-19 patients every day. We tested team members and patients in accordance with recommendations from the CDC. We modified quarantine and isolation guidance to keep patients safer and respond to the staffing shortages. Despite occasional outbreaks, our partner facilities, staff, and patients remained safe. Our vigilance has never wavered.

During the pandemic, frontline Wellpath team members continued to sacrifice and overcome personal and family challenges to ensure our patients, partners, and team were as safe as possible. Preventive measures were guided by senior clinical and operational leaders, many with infectious disease experience, who provided clear, calm, and consistent communications to our medical teams.

Our primary goals have not changed. During the pandemic, we continued to provide quality care for all patients, identified infected patients, and prevented the spread of the disease to the best of our ability. In addition, we established emergency procedures, monitored staff and partner exposures, and collaborated with community health officials.

“I would also like to highlight your staff responsiveness during the pandemic. Your staff provided medical guidance and supplies (PPE) during the early stages of the pandemic. Thanks to them, we were able to deal with and handle certain fears and concerns from my staff as well as the offenders.”

**Evan Joseph, Warden,
Richmond County
Correctional Institution,
Augusta, Georgia**



2021 Key Milestones and Events

Throughout the COVID-19 pandemic, Wellpath clinical leaders followed CDC guidelines in our clinical practices and processes. Key milestones from 2021 include:

- Our COVID-19 Executive Task Force monitored and led our response to the pandemic by providing direction and action to patients, partners, and staff.
- Our physician and executive leaders led internal clinical huddles to share information, provide guidance, address emerging issues, and answer questions in real-time.



- We ensured COVID-19 Emergency Preparedness Plans for partner sites were up to date.
- We marshaled PPE and supplies and opened a centralized warehouse in St. Louis to supply seven million PPE items to facilities around the country.

- We overcame the worldwide shortage of N95 masks and turned our attention to overcoming shortages of protective gloves, sharps containers, and hydration drinks.
- We increased the use of telemedicine to provide safe and effective patient care, facilitating more than 480,000 telehealth interactions through our remote care system.
- We provided additional support to our team members including extra sick time, free primary care, free mental health telemedicine, child and eldercare, academic support, and tutoring resources.
- Our senior governmental affairs and operations leaders conducted wide outreach at all levels, from local government to the White House, as well as numerous health and human service departments across the country to raise awareness of the need for PPE, testing, and vaccines in correctional facilities.
- We initiated an email and site level outreach campaign to identify the status of vaccinations for Wellpath personnel. The "Drive to 75" program asked employees to update their vaccination status with the goal of 75% vaccinated. By September, we reported a 74.6% team member vaccination rate¹.

- We implemented measures to comply with county, state and federal health-care worker mandates that were enacted during 2021. County and state mandates impacted 28% of our workforce, while the federal Centers for Medicare & Medicaid (CMS) mandates affected an additional 2% of our workforce as of December 31st. We implemented measures to comply with these mandates, including preparing communication to employees, processing medical and religious exemptions, and anticipating and addressing staffing changes. We will continue to monitor legislation and prepare accordingly.
- Our Chief of Psychiatry, Dr. Cassandra Newkirk, participated in a targeted educational session in 2021 for internal clinical leaders promoting and encouraging COVID-19 immunizations to employees and patients. Our goal was to continue promoting team member and patient vaccinations. We will continue to be vigilant and take a long-term perspective to preserve the health of our patients, health staff, and correctional staff.



Our Chief Psychiatric Officer Cassandra Newkirk, MD, participated in an educational session promoting and encouraging COVID-19 immunizations to employees and patients.

¹ Self-reported as of September 2021 based on a 79.8% participation rate.

Response at a Glance



Clinical outcomes

Due to improved care, as compared with 2020, we had a 56% increase in patient COVID-19 diagnoses, a 34% decrease in patient mortality rate, and a 41% reduction in average weekly COVID-19 related hospital admissions.¹



Vaccinations

Team Member
Vaccination Rate: 74.6%
as of September 2021²



Dollars invested

Our 2021 COVID-19 response to meet patient and team needs: \$28.7M

To ensure the delivery of efficient and effective care in 2021, we conducted more than 480,000 telehealth interactions.



¹ Calculated using data from sites managed by our ERMA CM which includes >80% of our ADP.

² Self-reported as of September 2021 based on a 79.8% participation rate.

Case Study

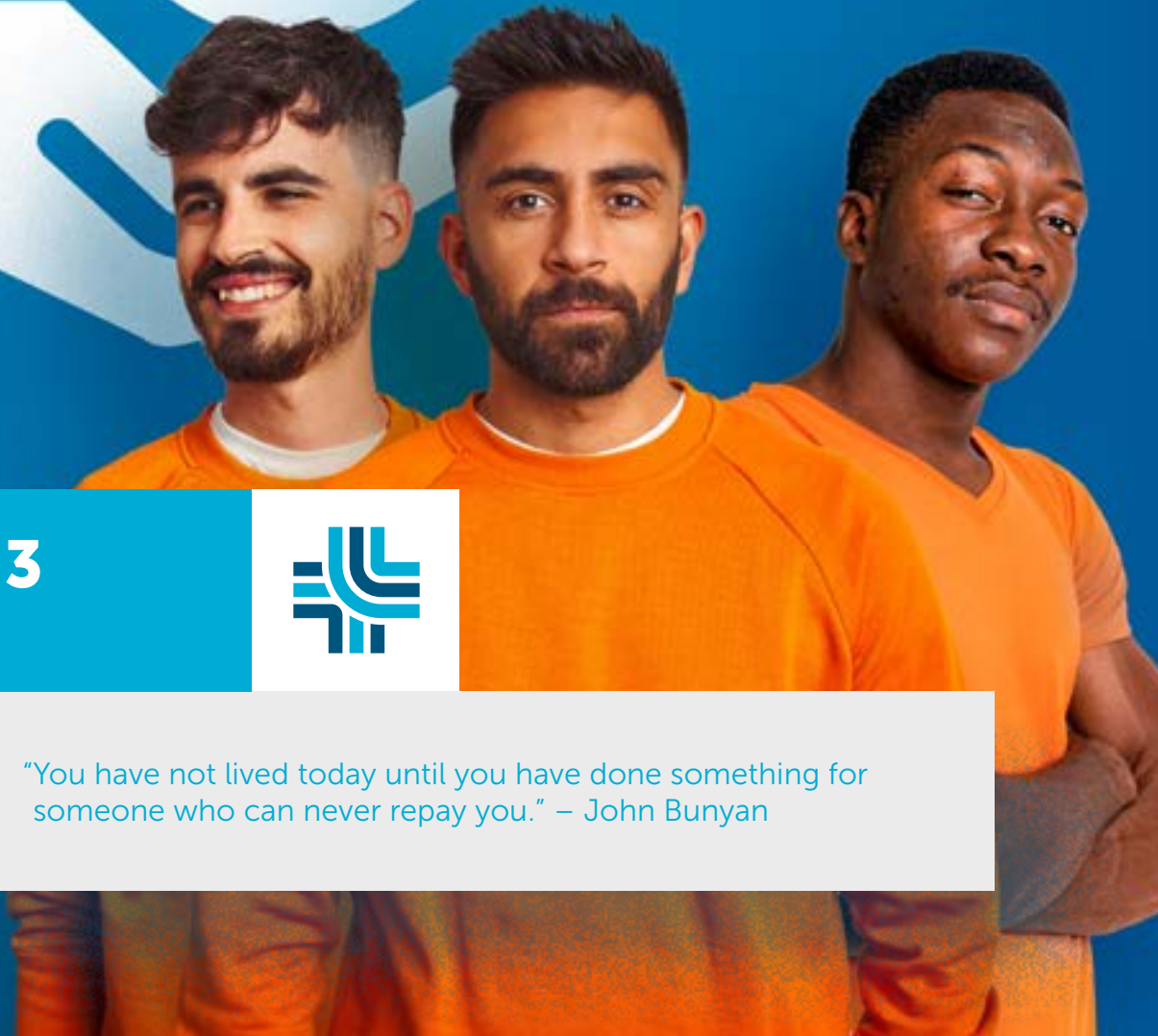
COVID-19 in Alameda County

Wellpath worked diligently to prepare the Alameda County Santa Rita Jail (SRJ) for the arrival of patients and others with COVID-19. We proactively implemented COVID-19 precautions before the pandemic impacted the SRJ. We developed a priority outbreak plan, which mimicked a rapid triage response model. Early planning and intervention with Wellpath, the Alameda County Sheriff's Office (ACSO) and the Public Health Department led to process development and a robust response, which exceeded community standards.

As a result of these efforts, the COVID-19 pandemic has had a minimal impact in this large jail. There have been no negative outcomes in our patients or our people and there have been no COVID deaths at the SRJ to date. Alameda County officials and court experts have lauded the collaborative efforts that led to this successful outcome. Our Master Outbreak Plan for the SRJ has been so successful that other California counties used it to guide their response to the pandemic in their facilities.

Additionally, we collaborated with the Alameda County Public Health Department and the ACSO to publish a manuscript on the epidemiology of coronavirus disease in a county jail. The manuscript is pending publication by the Journal of Public Health.





Chapter 3

Patients



“You have not lived today until you have done something for someone who can never repay you.” – John Bunyan

Everything We Do Is About Taking Care of People



Accreditation



Patient Feedback and Experience Surveys



Clinical Innovations



Mental Health and Psychiatry



Clinical Training



Pharmacy



Safe, Quality Patient Care

At Wellpath, patient care comes first, and everything we do is focused on helping the underserved. Our clinical strategy focuses on quality, the needs of diverse populations, innovation for a range of uniquely vulnerable and medically complex patients, and addresses key challenges of chronic diseases and behavioral health disorders.

Everything We Do Is About Taking Care of People

Patients are our primary stakeholders. They are incarcerated or hospitalized and are vulnerable, fragile, and often overlooked by society. They live in a jail, prison, or residential mental health facility and are neighbors who often need outpatient community care. Whether it is a diabetic who has never been educated on the management of their disease or the importance of monitoring their A1C level regularly, the hypertensive who has not had access to the most basic of generic blood pressure medications, or a patient with behavioral health disorders who has not been able to access the mental health system, we start with an offer of help, and a path to a better and healthier life.

Ours is a true “Culture of Caring.” If there is one unifying characteristic of everyone at Wellpath, it is the deep desire to make a difference by helping our patients



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get well. We approach every day as a distinct honor and show up with non-judgmental compassion to provide hope and healing to those who need it most.

Treating incarcerated patients with short and long-term chronic care issues like heart disease, cancer, diabetes, and serious mental illness is no different than treating patients in the community, except for special considerations of delivering care in an environment that neither the patient, their family members, or the caregivers control. When we meet a patient in a mental health facility, we also think of family members who want safe, compassionate, and constructive options for their loved ones. When we encounter an individual struggling with a SUD in a WCCC, we know it is a critical life-changing moment – a moment when they are ready for change.

We serve a diverse patient population that spans coast to coast and overseas, and includes patients of all ages, genders, races, religions, and socio-economic backgrounds. We care for many patients with Human Immunodeficiency Virus (HIV) and Hepatitis C (HCV) illnesses, which, according to the World Health Organization (WHO) are more prevalent in correctional settings than in the general population¹.

Specialized Patient Care

Our approach focuses on each patient's unique needs and SDoH. The following are a few examples of the specialized patient care we delivered in 2021:

- **COVID-19 Patients** – Wellpath has implemented CDC guidelines, policies, and procedures in different environments with different staffing levels over the past two years. As a result, Wellpath COVID outcomes have mirrored community outcomes, while providing care in vastly more difficult environments than those present in the general population. In 2021, we had a 56% increase in COVID-19 diagnoses, a 34% decrease in patient COVID-19-related mortality, and a 41% decrease in COVID-19 related hospital admissions.² We were an industry leader in developing patient education materials specific to corrections, and we partnered with National Commission on Correctional Health Care (NCCHC) to make these materials available to others in the industry.
- **SUD and MAT** – Wellpath is a national leader in developing and offering MAT services within correctional facilities. We are nationwide experts in the management of withdrawal from substances commonly abused in our patient population. We currently offer MAT programs in over 100 facilities nationwide. Our MAT services use safe, proven, evidence-based medication therapies (methadone,

¹ <https://www.who.int/teams/global-hiv-hepatitis-and-stis-programmes/populations/people-in-prisons>

² Calculated using data from sites managed by our ERMA CM which includes >80% of our ADP.

In-Facility Medication-Assisted Treatment

100+

Facilities offering some version of MAT¹

32

Facilities providing induction of buprenorphine

350+

DEA-X Waivered Providers

78

Facilities that continue MAT at intake

44

Facilities with a vivitrol-only program

2

Licensed OTP² facilities inside jails for induction of methadone

¹ MAT in this context is defined as the use of one, or a combination of medicines vivitrol, buprenorphine, naltrexone, and methadone to treat opioid addiction.

² Opioid treatment program.

buprenorphine, and naltrexone) and treatment protocols informed by the recommendation of the American Society of Addiction Medicine (ASAM).

Our staff treats individuals with co-occurring mental illness and SUDs within our facilities. Correctional programs use evidence-based treatment approaches, including motivational interviewing, cognitive-behavioral treatment, and relapse prevention. Our WCCCs strive to create a seamless transition to the community for individuals with SUDs.

- **Female Patients** – The specialized needs of our female patients include chronic gynecological care and postnatal care. Our team includes specialized women's health nurse practitioners for routine care and appropriate screenings, obstetrician physicians for oversight and complex care, pharmacists handling medication review and education, and mental health providers to treat depression, anxiety, and other psychiatric issues that may arise during pregnancy. Dietitians or nutrition counselors educate patients on a healthy diet and any metabolic issues that may arise during pregnancy. Psychological care

Wellpath treats juvenile patients at more than 80 facilities globally.



is available to all patients, and we offer postnatal psychological care as well. Women separated from older children can also receive counseling services to work through family changes.

- **Juvenile Patients** – While juveniles are a small portion of our patient population, less than 5% of our ADP, Wellpath understands the needs of young patients who are still developing physically, intellectually, and emotionally. Our experience working with this special population includes both ado-

lescent medical and mental healthcare essential to assessing and treating their unique healthcare needs. The treatment team for this young population creates a therapeutic and motivating environment to help young offenders change. Wellpath follows youth-specific NCCHC standards, policies, and procedures. We foster a therapeutic transition back into family, school, and community by providing support and education to the youth and their family or support team on communication, coping, life skills, connecting with community resources, and creating a success plan.

Accreditation

Wellpath currently provides healthcare services for more than 200 facilities accredited by the NCCHC, American Correctional Association (ACA), Joint Commission, or Accreditation Association for Ambulatory Health Care (AAAHC).



The Joint Commission provides accreditation and certifies medical programs and organizations, including hospitals. The accreditation requirements for the Joint Commission exceed the standards of both the NCCHC and ACA.

We have 24 Triple Crown facilities among our partners. The National Sheriffs' Association (NSA) presents its prestigious Triple Crown Award to correctional facilities that achieve accreditation by the NCCHC, ACA, and Commission on Accreditation for Law Enforcement Agencies (CALEA).

24

Local detention Triple Crown facilities

100%

Success rate for partners seeking accreditation

“During the course of our partnership, we have carried out program improvements that include first-time accreditation by the ACA and implementation of technology resources such as [their] ERMA and electronic medication administration record.”

**Director of Health Services
Current Wellpath Partner**

According to the NSA, “Achieving these accreditations individually is a daunting task. Acquiring all three at the same time is an extraordinary feat. The Triple Crown distinction is so rare that since the establishment of the award in 1993, fewer than 100 sheriffs’ offices have qualified.”¹

Wellpath has never failed to obtain medical accreditation at our partner sites, nor have we ever lost accreditation.

Opioid Treatment Program Accreditation

The SRJ in Alameda County, California, recently renewed its NCCHC OTP Accreditation, which means the jail is a fully licensed

opioid treatment program inside of the jail. As a result, they can prescribe and dispense methadone and the other forms of MAT treatment – a rare achievement in the correctional world.

National Committee for Quality Assurance (NCQA) Accreditation

We are working to have our Wellpath Centers of Excellence (COEs), a service of the Wellpath Healthcare Cloud, and disease pathways accredited by the NCQA. This is a widely recognized, evidence-based program dedicated to quality improvement and measurement. We seek Population Health Program Accreditation, which focuses on evaluating the population and delivering person-centered interventions based on individual needs. The NCQA will evaluate Wellpath in key areas, including data integration, population assessment and segmentation, targeted interventions, provider support, and quality improvement. We expect to have this certification in 2022.

¹ <https://www.sheriffs.org/about-nsa/triple-crown-award>

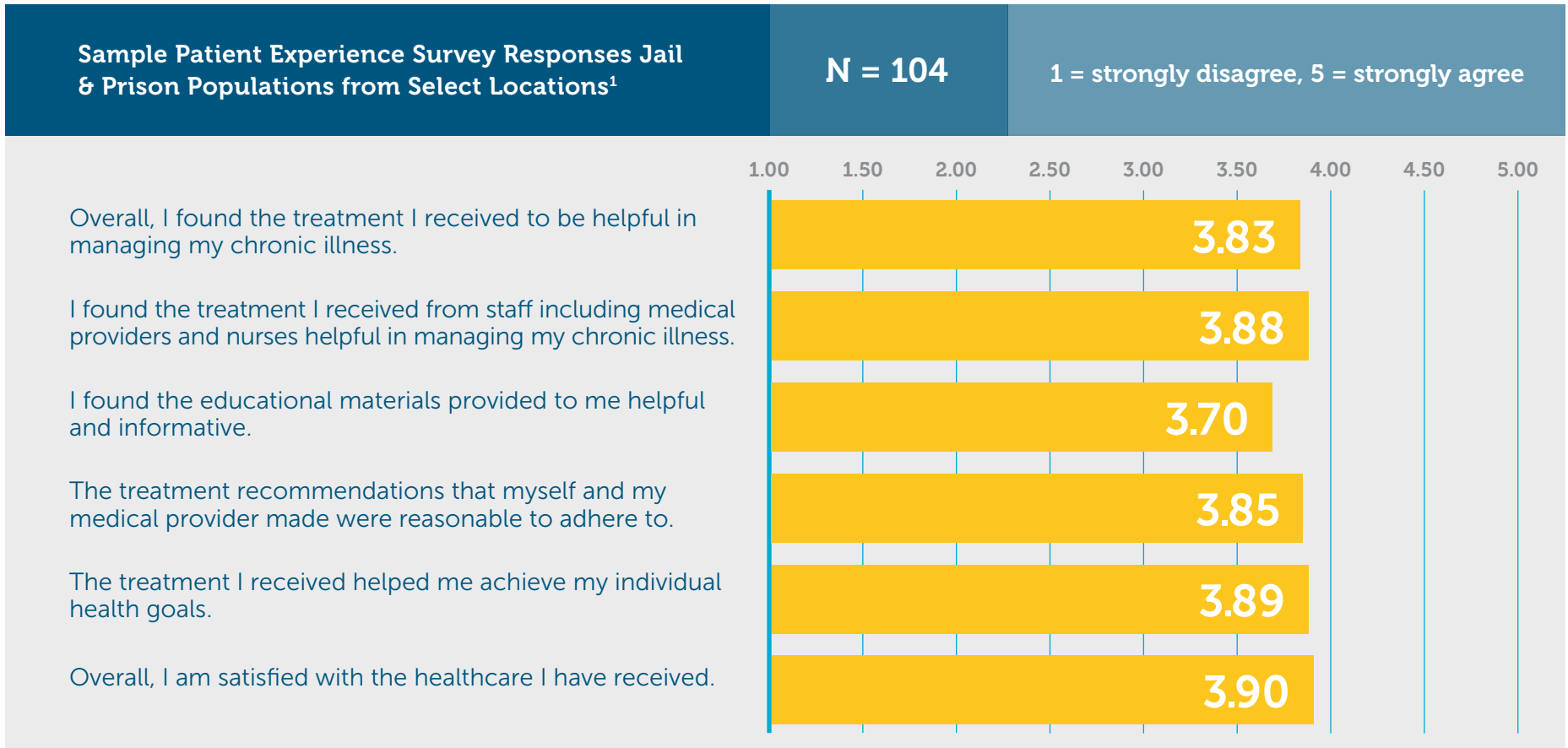
Patient Feedback and Experience Surveys

At Wellpath, our patients come first, and their voices matter. We survey patients to gain feedback about their care and better understand their experience while identifying our strengths and weaknesses.

- **Recovery Solutions** – Our Recovery Solutions division conducts regular patient satisfaction surveys. We received 2,065 survey responses in 2021 regarding their experience of healthcare services.

- **Local Government and State and Federal** – During 2021, we surveyed our prison and jail populations for the first time and will continue to do so annually. See graphic for results from various Massachusetts DOC sites, the Humboldt County Correctional Center, and the Clark County Correctional Center.

- » **Local Government in Clark County Correctional Center, Nevada** – In a survey administered to patients in the Clark County Detention Center in Nevada, our Local Government division and clinical team measured the experiences of men and women with chronic medical and mental health needs. The responses helped us focus on areas where improvements could be useful.



¹ Surveyed locations include various Massachusetts DOC sites, the Humboldt County Correctional Center, and the Clark County Correctional Center.

Clinical Innovations

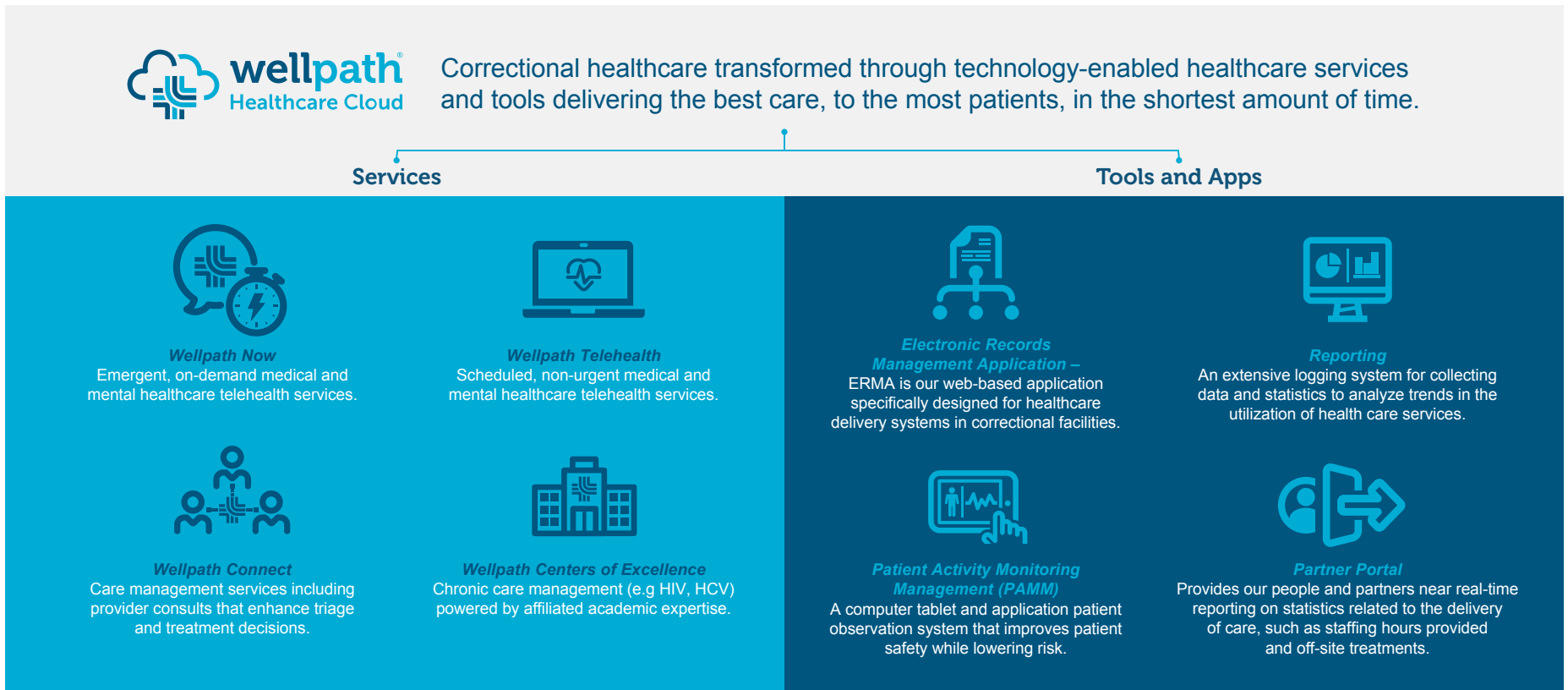
Wellpath has demonstrated success in collaborating with partners in developing innovative solutions for their healthcare programs; for instance, our remote telehealth service is one way to meet the special needs of our incarcerated patient population. Combining our telehealth encounters and online specialty referral consults, our provider teams successfully conducted 482,158 telehealth interactions in 2021.

Wellpath Healthcare Cloud

The Wellpath Healthcare Cloud is a suite of technology-enabled, remote healthcare services and tools allowing us to deliver the appropriate care to the most patients who can benefit from a remote encounter, with the lowest waiting time possible. With a simple click of a button, on-site staff can access expert resources for treatment planning, decision-making, referrals, and long-term care.

Wellpath Healthcare Cloud improves:

- Clinical quality
- Patient and staff safety
- Time to expert emergent and specialty care
- Decision-making for off-site visits
- Care standardization
- Clinical best practices and risk reduction



The Wellpath Healthcare Cloud includes:



- **Wellpath Now** is staffed by emergency medicine providers trained to deliver time-sensitive emergency evaluations and consultations for emergent and urgent on-demand telehealth services. Our Wellpath Now provider response time averages five minutes. On-site nurses, custody staff, and providers have immediate video-enabled access to seasoned providers, bringing emergency department expertise directly to our patients and enhancing our on-site care delivery capabilities. Our client partners have significantly reduced the cost of emergency room transfers by using Wellpath Now, and our patients see the appropriate emergency provider without the delay traditionally experienced in a hospital emergency department.



- **Wellpath Telehealth** is easy to use and powered by Wellpath clinical expertise. This online tool provides a secure single sign-on (SSO) process to improve the user experience and simplify care coordination. In addition, it enables online scheduled patient visits with various primary care and specialty services, such as telepsychiatry. In 2021, we performed more than 184,000 telehealth visits, approximately 73% of which were synchronous. We expect to expand this program to more partners for patient care and operational efficiencies.



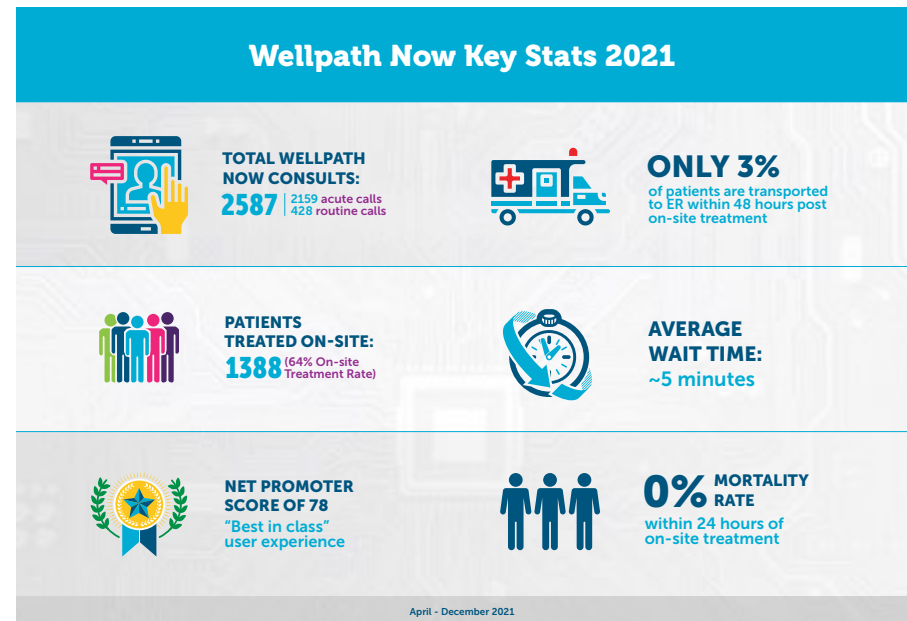
- **Wellpath Connect** offers centralized care management and off-site management services that enhance healthcare triage and treatment decisions. On-site providers gain timely access to specialty care through enhanced remote care coordination and expert clinical consultations via eConsults. Wellpath Connect has significantly reduced unnecessary off-site specialty consults, reduced agency transports, and mitigated avoidable safety risks. Overall, we conducted 297,366 online specialty referral consults in 2021, a 145% increase from 2020. Compared to the traditional model, Wellpath Connect services continue to exceed quality metrics related to improved precision of clinical decision-making.



- **Wellpath COEs** provide best practice chronic care management (e.g., HIV, HCV) powered by academic medicine-affiliated expertise. COEs leverage telehealth to optimize best practice clinical outcomes, implement evidence-based protocols, increase access to subspecialty care, and achieve the highest community standards of care for chronic conditions. Our COEs provide care for almost 100,000 of our patients among our divisions.

We currently have COEs to treat patients with the following diseases:

- » **Infectious Diseases** (HIV, HCV)
- » **Autoimmune/Inflammatory Diseases** (Crohn's, Multiple Sclerosis, Psoriasis/Psoriatic Arthritis, Rheumatoid Arthritis)
- » **Oncology**



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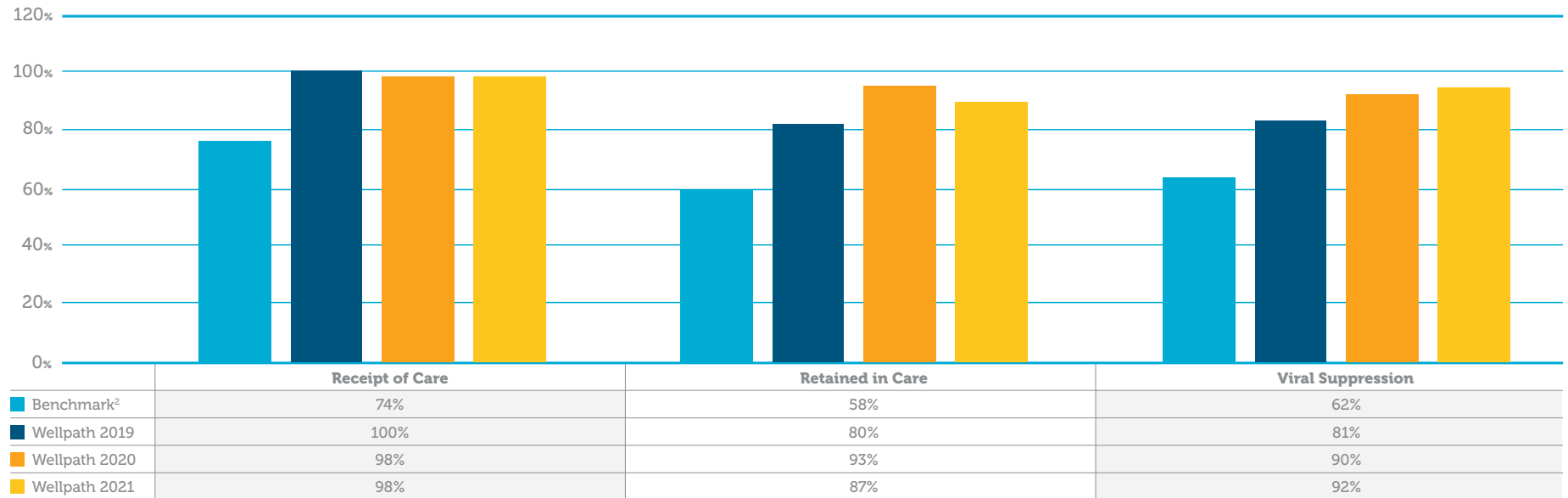
- **HIV COE** – Our HIV COE incorporates best practice care delivery and best available pricing for specialty pharmaceuticals in collaboration with provider specialists from our academic medical center partner. Therapeutic optimization addresses quality and total cost of care by choosing the correct pharmacological treatments to suppress viral load and improve medication adherence. Specifically, we can use evidence based specialty drug treatment regimens to maximize outcomes, with HIV care performed by infectious disease experts specializing in corrections. Outcome measures include suppressing circulating viruses, preserving immunologic function, reducing morbidity and mortality, and preventing transmission. These outcome measures are made possible by optimizing screening, laboratory testing, continuity of care, and therapeutic optimization. Our HIV COE program has achieved viral suppression rates 30% higher than the national average. Our HIV COE has been able to:
 - » Improve receipt of HIV care and improve care within one month of intake for 90% of patients

- » Improve retention in HIV care to greater than 87%
- » Improve HIV viral suppression to greater than 92%, including 30% higher viral suppression rates than the national average by addressing the social determinants often cited as inhibiting medication adherence for patients with HIV: housing, food, access to care, and disease state/medication literacy

These outcomes are significantly better than the reported outcomes of CDC’s Selected National HIV Prevention and Care Outcomes in the United States National HIV/AIDS Strategy, 2020.

Wellpath provides confidential, case-by-case HIV testing and counseling to patients who request it. We report confirmed cases of HIV to the local health department as required by law.

Wellpath Outcomes as Related to Selected National HIV Prevention and Care Outcomes in the United States National HIV/AIDS Strategy, 2020 (NHAS 2020)¹



¹ Wellpath outcomes include 120 patients from Arkansas DOC.

² <https://www.cdc.gov/hiv/pdf/library/factsheets/cdc-hiv-national-hiv-care-outcomes.pdf>

Mental Health and Psychiatry

Mental Health

Mental health issues are prevalent in nearly all correctional environments, and are a key focus for Wellpath. Approximately 40% of our patients in jails and prisons have mental illnesses. Wellpath provides behavioral health services in more than 300 facilities. Wellpath mental health assessments comply with NCCCHC standards and The Joint Commission for mental health and recovery facilities.

Admission to a correctional facility or recovery hospital can overwhelm and distress patients. Early establishment of a proactive plan of care begins as soon as possible after admission. Making early contact and establishing rapport with a mental health provider has been shown to ease patient concerns and fears by letting them know help is available. This key relationship can establish and maintain stability throughout incarceration.

Patient-Centered Mental Healthcare

Wellpath promotes patient empowerment, independence, and self-sufficiency as integral aspects of our recovery and treatment model. Trauma is prevalent among patients served by the mental health and criminal justice system, and we work with them to minimize trauma and maximize choice.

Active treatment planning and consistent care build patient trust, reduce crises, and identify harmful trends early - all key factors in treating behavioral issues. Our patient-centered culture promotes recovery and strives to reduce recidivism.

Evidenced-Based Programming

Our evidence-based mental health programming targets specific issues and addresses recidivism risk factors. Programming includes patient assessment and evaluation, suicide prevention, special needs treatment plans, referrals, ongoing care, and discharge planning.



Identification of Unstable Patients

An important patient care goal is identifying individuals with mental health issues that may interfere with their functioning, the operation of the facility, or both. We try to stabilize individuals who enter the facility with chronic mental health conditions. We recommend a more intensive mental health program if mental health issues cannot be safely addressed in the correctional setting.

Psychiatry Solutions

Wellpath values multidisciplinary and supervisory clinical collaborations that give our local teams access to consultations and case discussions with individuals and groups with expertise in forensic psychiatry, psychology, somatic medicine, law, and healthcare administration.

We seek out community records to confirm existing psychotropic medication regimens to provide continuity of care from intake to release. When appropriate, we initiate referrals for psychiatry services, special needs program enrollment, placement in identified mental health units, and group programming – including substance abuse treatment services.

Wellpath provides mental health or psychiatry services at over 350 partner facilities throughout the country. In facilities where another contractor, local agency, or group provides mental health services, we work cooperatively as the medical services provider, engaging with the behavioral health team, to meet this population's needs. To support the work done by the on-site team, we have more than 140 medical and mental health specialists available in 40 specialty areas via Wellpath Connect in the Wellpath Healthcare Cloud.

Suicide Prevention and Awareness

The overwhelming fear and/or depression that can be brought on by incarceration sometimes leaves our patients feeling hopeless. These feelings are often exacerbated by other factors such as receiving bad news, sentencing, and the side effects of medically supervised drug and alcohol detoxification. Suicide as a result of these emotional changes is thus a risk with our patient population. We use evidence-based assessment (e.g., the Columbia Suicide Severity Rating Scale) and treatment protocols (e.g., Collaborative Safety Planning) in our suicide prevention program. We assess patients for risk of self-harm at intake and mon-

To save a life, all you need is...

2 EARS & 1 HEART

Listening is the key to suicide prevention.

Suicide prevention is everyone's responsibility. Don't assume someone else sees and hears what you do. **Take action now.**

Signs of Increased Risk for Suicide:

- Talking about dying or suicide
- Saying goodbye
- Giving away possessions
- Anger
- Hopelessness, helplessness or desperation
- Mood changes
- Mentioning strong feelings of guilt and shame
- Substance use or withdrawal
- Receiving bad news

 **ZERO SUICIDE INITIATIVE** If you are concerned about yourself or someone else, reach out to a mental health or medical professional at this location.

Brought to you by the Wellpath Zero Suicide Committee.  **wellpath**
To hope and healing.

itor them throughout incarceration or hospitalization. A Qualified Mental Health Provider (QMHP) completes a Suicide Watch Initial Assessment and starts suicide watch for patients at high risk of self-harm.

Our Zero Suicide Committee (ZSC) oversees ongoing suicide prevention processes and education across all Wellpath divisions. Our committee recognizes Suicide Prevention and Awareness Month in September with speakers, resources, training,

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and events designed to make everyone, including our partners, a “noticer” to save lives. Our theme for Suicide Prevention and Awareness Month in 2021 was “2 ears and 1 heart are all you need to save a life.” We hope to prevent as many of these unfortunate events as possible through continued education and awareness.

The committee also publishes the Helping Our Patients Every Day (H.O.P.E.) Highlights Suicide Prevention and Awareness Newsletter. This newsletter updates our team on the organization’s suicide prevention efforts to expand and enhance our mission to save lives. We adopted the name H.O.P.E. Highlights to reinforce our mission to **Help Our Patients Every Day**. H.O.P.E. also has a meaning for our patients to **Hold On, Pain Ends**.

Recovery and Re-Entry Services

Our Recovery Solutions division is a premier provider of mental health and residential treatment services, with 22 years of experience operating state forensic and civil psychiatric hospitals and adult residential treatment centers, as well as jail-based competency restoration programs. We have a vast knowledge of industry-leading, effective, and empirically supported practices. We use innovative methodologies and program models to treat patients with mental health conditions, and patients and individuals with SUD.

Forensic Treatment

Our Recovery Solutions division provides competency restoration services to approximately 650 individuals each day and produce more than 2,100 competency reports to the courts in any given year. We collaborate with state and county partners in California, Colorado, Florida, Massachusetts, South Carolina, and Washington to increase our forensic capacity.

Jail-Based Competency Treatment (JBCT)

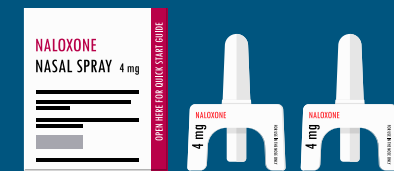
Individuals must be competent to participate in the legal process and exercise their rights when facing legal proceedings. Working with individuals enrolled in our California JBCT programs, Wellpath can provide treatment to help restore a patient’s competency, in 59 days, on average, and these patients can then meaningfully participate in the legal proceedings concerning them.

Saving Lives with Narcan®

Narcan®, also known as naloxone, is an important tool for Wellpath first responders to reverse the symptoms of an opioid overdose and potentially save patient lives.

401 lives saved with Narcan® 2021

Since we started using Narcan® in 2015, our staff saved 1,377 patients from overdosing.



Wellpath stocks Narcan® in emergency response kits at our partner facilities as allowed by state law. We train nurses to administer Narcan® when a patient may be undergoing an opioid overdose. Patients found unresponsive with unknown cause, pulseless, or apneic receive Narcan® as part of the resuscitative process.

Wellpath empowers nurses to use Narcan® to save lives. Since we started using Narcan® in 2015, our staff saved 1,377 patients from overdosing, 401 in 2021 alone.

Wellpath has helped many of our correctional partners provide Narcan® kits to “at-risk” patients at release. We have also helped sites identify external funding sources to support these potentially lifesaving efforts.

Lifesaver Medal Program

The Wellpath Lifesaver Medal Program, formed in 2021, recognizes team members and partners who have exceeded their job requirements and expectations



to save a life. We appreciate those who take heroic actions when facing a medical or mental health event. A review team selects individuals and groups periodically who have taken heroic actions to save a life. These individuals receive a medal from a company leader in a personalized ceremony. Team members can nominate their colleagues online. Inaugural presentations are expected in 2022.

Clinical Training

Wellpath maintains clinical/academic collaborations with community education partners, to create clinical training opportunities that improve patient outcomes available to a wide variety of students. These collaborations enable university and college students to work with a patient population not normally encountered in most mental health and psychiatric training programs. The students appreciate experiencing first-hand the intersection between individuals with mental illness and the criminal justice system. This clinical/academic partnership also nurtures and develops young mental health professionals and psychiatrists interested in correctional settings and forensic hospitals. Wellpath has Clinical Affiliation Agreements with many nursing schools that allow nursing students to complete their clinical rotations at our sites, learning about the specialty of correctional healthcare.

Wellpath offers Crisis Intervention Team (CIT) training to correctional staff on request. This 40-hour training provides an evidence-based curriculum on responding to and interacting with individuals dealing with mental illness. We teach staff to pre-

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vent escalation of crises, thereby avoiding physical harm, emotional distress, and minimizing the occurrence of trauma to both patients and staff. National Institute of Corrections (NIC) data shows that CIT training typically results in a decreased use of force and increased officer self-efficacy when responding to patients. We offer standardized suicide prevention and mental illness training to medical and partner staff through our ZSC.

Pharmacy

Wellpath provides pharmacy services in accordance with applicable laws, guidelines, policies and procedures, and accepted community standards. Our pharmaceutical management program includes:

- Formulary and non-formulary oversight
- Prescribing, filling, and administering medications
- Recordkeeping
- Appropriate licensure
- Prescriber authority certification management
- The secure and proper storage of medications

We are responsible for various pharmacy services which may include:

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

Psychotropic Medications

Wellpath's commitment to quality psychiatric care includes appropriate evaluation and treatment, and the use of psychotropic medications if clinically indicated, in accordance with each patient's needs and disease progression.



Our written policies, procedures, and clinical letters for psychiatric services, which address treatment planning, laboratory studies, informed consent, non-compliance, and management of various conditions, are based on national standards, industry best practices, and ongoing epidemiological developments and trends. Our psychiatric services comply with applicable state and federal rules.

Discharge Medications

Wellpath ensures patients are provided with a discharge plan to obtain the required medications to accommodate the transition to a community provider and prevent a lapse in care. Before discharging patients, we train them on obtaining and maintaining their medications. We also provide links to community resources for prescription services, such as InMedRx.

Safe, Quality Patient Care

Wellpath constantly evaluates its performance and identifies ways to provide safer care and meet evolving community standards and evidence-based protocols. We operate a comprehensive Continuous Quality Improvement (CQI) program in support of these initiatives. This quality management process encourages team members to continuously ask: “How are we doing today?” and “How can we do even better?”

The Wellpath chief clinical officer (CCO) and vice president of CQI lead this program to ensure systems and programs provide healthcare services and clinical care delivery that meet or exceed our high expectations and standards. The CQI plan includes on-site and off-site service assessments for quality, appropriateness, and continuity. Its goals are **zero preventable harm** and the operation of systems and programs to help ensure that our patients receive quality, safe, reliable, and effective healthcare services.

We conduct audits, medical chart reviews, and studies to ensure services meet established minimum thresholds. We also monitor relevant areas for quality improvement, including accreditations, credentialing, environmental inspections, emergency drills, nursing, intake, medication management, special housing, and ancillary services.

We also apply the **Quadruple Aim**, a safety framework designed to help hospitals improve patient outcomes and the quality of care for our vulnerable populations. Our policies and procedures are based on NCCHC standards to ensure patients receive quality, compliant healthcare. We use proven performance monitoring techniques like our CQI program, Medical Administration Committee (MAC) oversight, and peer reviews to evaluate our healthcare programs.

Patient Safety Organization

Wellpath became part of a Patient Safety Organization (PSO) in 2016 as part of our commitment to improved patient care and safety. The Patient Safety and Quality Improvement Act of 2005 established PSOs to create a confidential, non-punitive, and legally secure environment where clinicians and healthcare organizations can voluntarily report, aggregate, and analyze data relating to

adverse events, errors, and near misses, to systematically reduce the risks and hazards associated with patient care. PSO participation focuses on a culture of safety by design and a systems approach to improvement opportunities. Most work product created through PSO participation is considered confidential and privileged Patient Safety Work Product, protected by the federal statute. Wellpath values its PSO participation as a vehicle for enterprise-wide patient safety improvement.

Quality Improvement Committee

A multidisciplinary quality improvement (QI) committee directs on-site CQI activities. The site medical director leads the QI committee, which typically includes the HSA, site safety coordinator, designated mental health representative(s), and appropriate site representative(s). The QI committee is responsible for monitoring activities, discussing the results, and implementing corrective actions if needed.

The committee meets regularly (monthly or quarterly) to review significant issues and changes and discuss plans to improve processes or correct deficiencies. Activity records are confidential, and discussions, data collection, meeting minutes, problem monitoring, peer review, and information collected from the CQI program are not duplicated for external review based on our participation in the PSO.

High-Risk Items

Our CQI program addresses many forms of risk management, using clinical and environmental risk tools, to identify and reduce variability and liability when adverse events occur, including, but not limited to:

- CQI Committee Meetings
- Chart Reviews
- Credentialing
- Critical Clinical Event (CCE) Reviews
- Emergency Drill Reviews
- Environmental Inspection Reports
- Grievances
- Mortality Reviews
- Peer Reviews
- Pharmacy Reports
- Resolution Tracking
- Utilization Management



Workforce Diversity and Inclusion (D&I)

2021 Team Member Demographics

Talent Acquisition and Retention

Development and Engagement

Health and Well-being

Team Member Safety

Chapter 4

People

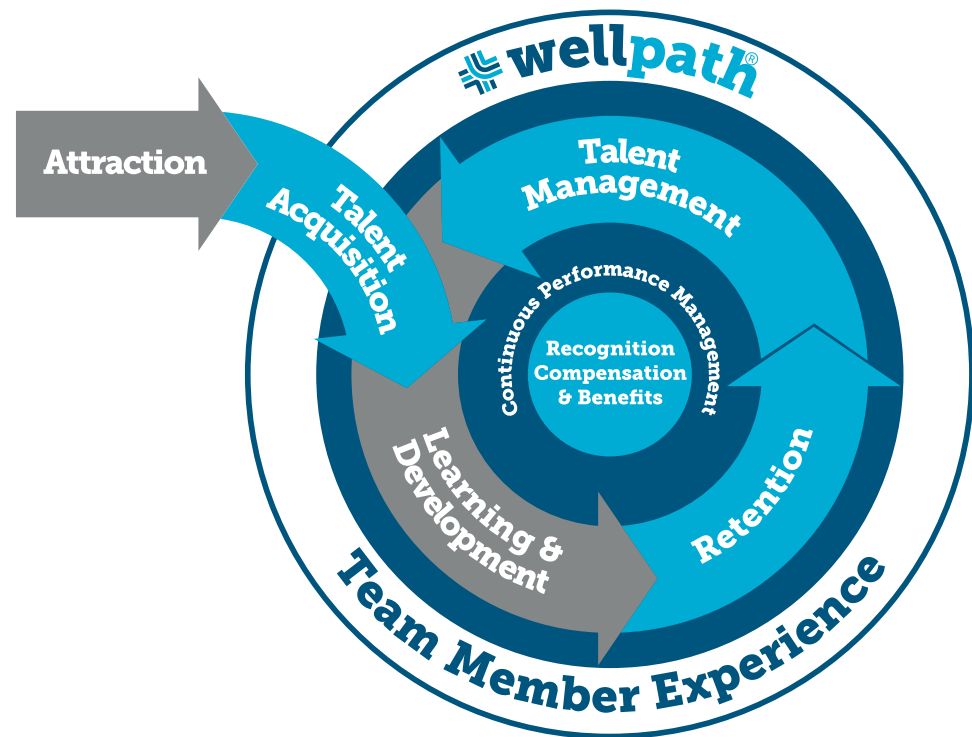


“Never believe that a few caring people can’t change the world. For, indeed, that’s all who ever have.” – Margaret Mead

Providing quality patient care demands the best possible people. Our people strategy emphasizes leadership, culture, and benefits to scale.

Our people strategy ensures:

- A diverse and inclusive team that reflects the patient populations that we serve
- Depth and quality of leadership
- A culture that supports and appreciates team members
- We attract and retain high-performing talent
- Optimized human capital investments
- Process improvements to achieve our goals



Workforce Diversity and Inclusion (D&I)

We are committed to sustaining an environment free from discrimination and a place where our people can thrive by creating a supportive, fair, and safe culture of thought, race, color, national origin, religion, sexual orientation, gender, and ability.

Wellpath is an organization where team members can bring their “whole selves to work”. They provide hope and healing to our patients, partners, and each other. Our competent and diverse workforce aligns with our culture and mission to provide quality patient care.

In 2021, we achieved diversity and inclusion goals, including:

- Hired a senior manager of inclusion and diversity to develop, deliver, and support programs, processes, and tools to drive organizational inclusion and diversity efforts.
- Engaged a nationally recognized firm to create and facilitate Conscious Inclusion, a comprehensive inclusion and diversity training module, to 27 Wellpath Human Resources Business Partners (HRBPs) tasked with creating a module for future participants.
- Facilitated Conscious Inclusion training for more than 90 Wellpath executives and managers at the Annual Leadership Conference.



- Engaged a nationally sought-after inclusion and diversity speaker to address executives and managers on the importance and benefits of inclusion and diversity in the workplace.
- Sponsored Women in Technology of Tennessee to improve diversity among our technology hires.
- Announced a partnership with Morehouse School of Medicine, the first medical school established at a Historically Black College and University (HBCU) to create a new life coach certificate program to address and assist with the needs and issues of justice-involved individuals. The courses will equip leaders with the critical skills needed to build positive outcomes and pathways to success. Participants will receive a scholarship and upon completion will earn the Pathway Forward Coaching Certificate.

- Sponsored the KSCMHE at Morehouse School of Medicine to develop a series of webinars focusing on care of incarcerated individuals and improving mental health, substance abuse, and health equity services to formerly incarcerated individuals to reduce recidivism.
- Joined a coalition of over 2,000 CEOs by signing the CEO Action for Diversity & Inclusion™¹.
- Recognized Martin Luther King (MLK) Junior Day as a company-wide holiday. It was previously an optional holiday that employees could recognize using a floating holiday. The change honors the life and achievements of the civil rights leader known for using nonviolent civil action in the 1960s to improve social equality for all.



“My objective is to nurture a culture where all team members, regardless of their backgrounds, are treated fairly and feel valued for the unique perspectives they bring to Wellpath.”

Costin Shamble,
Wellpath Senior Manager of
Inclusion & Diversity

In 2021, Wellpath welcomed Costin Shamble, our new Senior Manager of Inclusion & Diversity. At Wellpath she will set out to influence and lead cultural action plans that will increase equity, diversity, and inclusion at Wellpath in our team member experience, services, policies, processes, and the communities in which we serve.

Costin has extensive experience designing, implementing, and facilitating D&I programs and initiatives for businesses, government agencies, higher education institutions, and non-profit organizations. She has also consulted with HR professionals on developing programs to attract, engage, retain, and promote a diverse workforce.

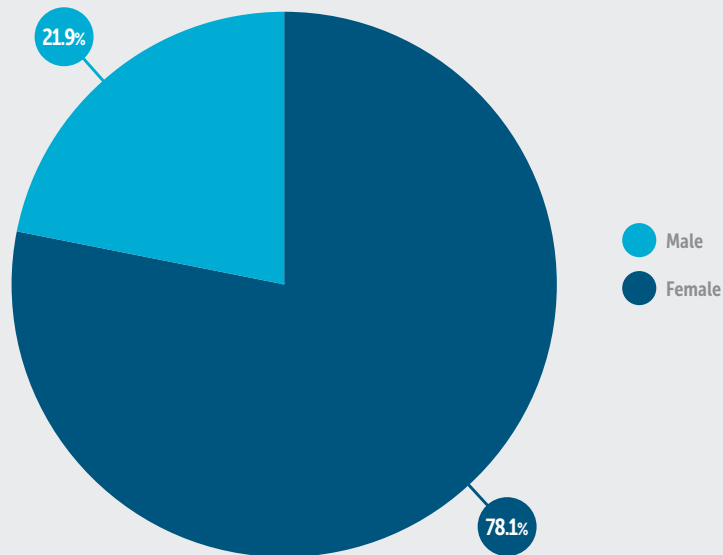
A licensed attorney, Costin is a graduate of Spelman College and Vanderbilt University Law School and served as a judicial clerk in the United States Court of Appeals, Sixth Circuit.

¹ Wellpath Signs CEO Pledge in Inclusion & Diversity™ | Wellpath (wellpathcare.com)

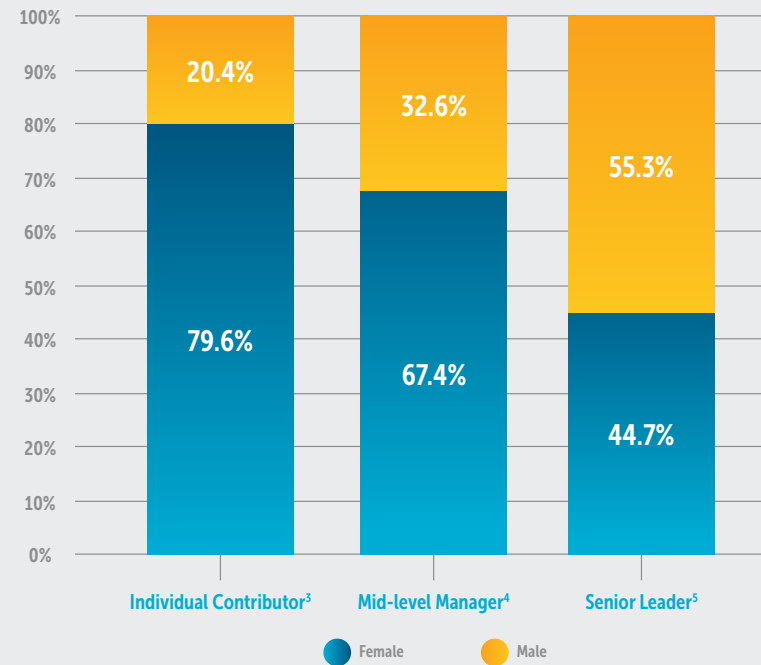
2021 Team Member Demographics¹

Wellpath Workforce²: 14,265

Gender Representation



Gender Representation by Position



¹ As of December 31, 2021 for U.S. operations.

² Includes U.S. full-time, part-time and PRN employees.

³ Individual contributors include professionals without management responsibilities who help support our goals and mission.

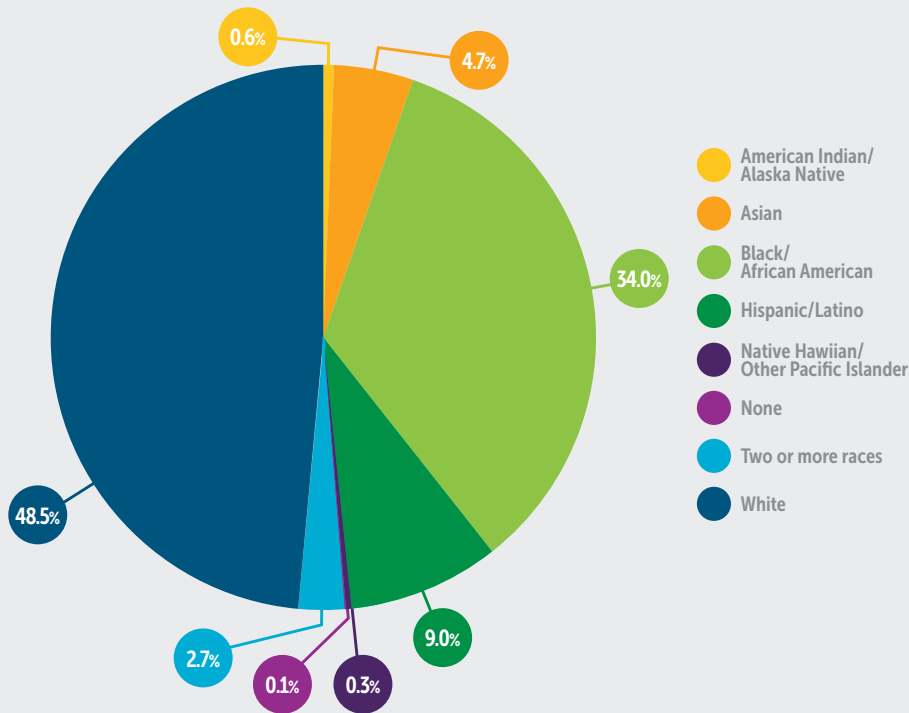
⁴ Mid-level managers include supervisors, managers, directors, and team members that either have direct reports or oversee a functional department with the organization.

⁵ Senior leaders include vice-presidents, executives, and the c-suite.

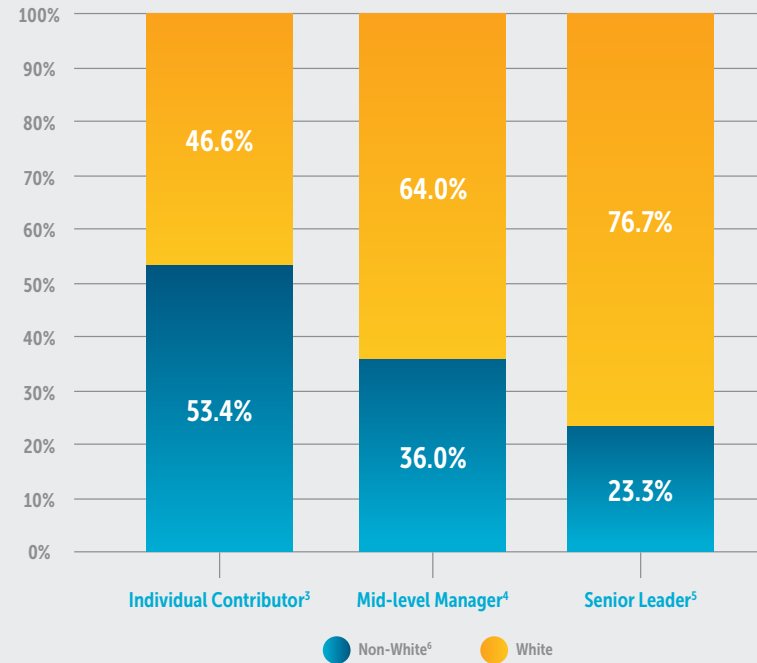
2021 Team Member Demographics¹

Wellpath Workforce²: 14,265

Ethnic Representation



Ethnic Representation by Position



¹ As of December 31, 2021 for U.S. operations.

² Includes U.S. full-time, part-time and PRN employees.

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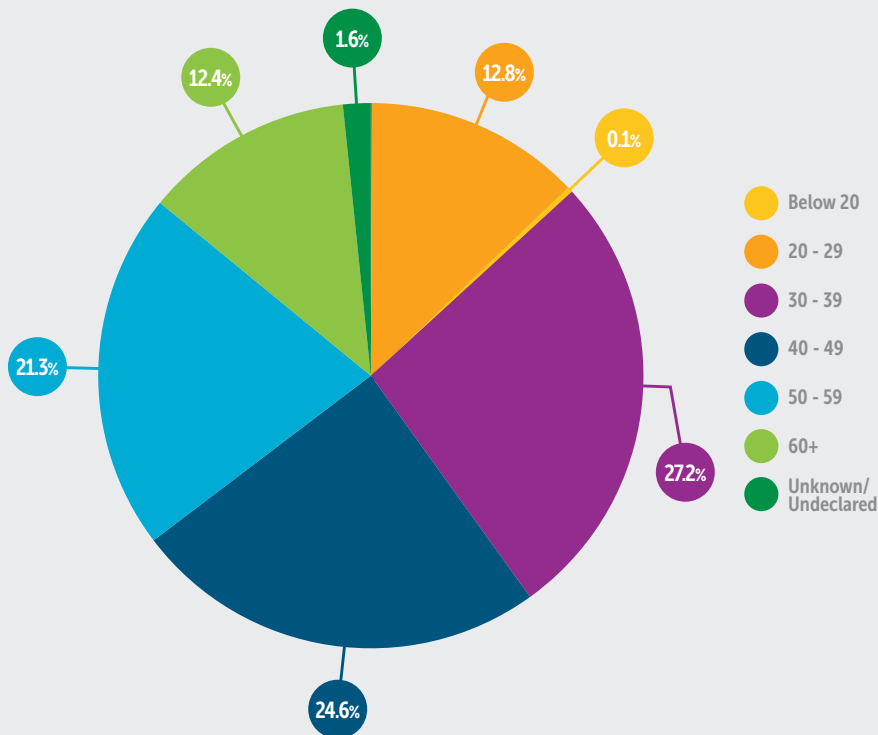
⁵ Senior leaders include vice-presidents, executives, and the c-suite.

⁶ Non-white includes all ethnic categories except White and unknown/undeclared ("None").

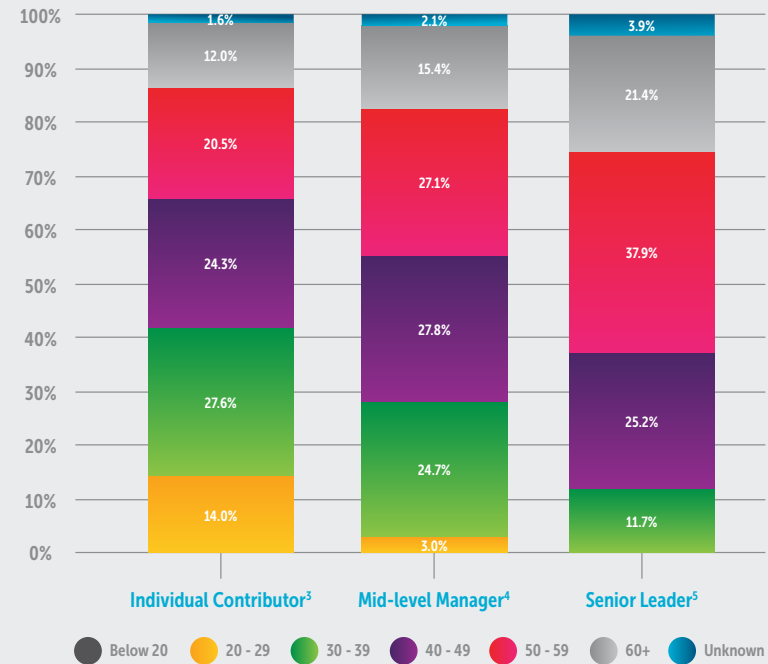
2021 Team Member Demographics¹

Wellpath Workforce²: 14,265

Age Representation



Age Representation by Position



¹ As of December 31, 2021 for U.S. operations.

² Includes U.S. full-time, part-time and PRN employees.

³ Individual contributors include professionals without management responsibilities who help support our goals and mission.

⁴ Mid-level managers include supervisors, managers, directors, and team members that either have direct reports or oversee a functional department with the organization.

⁵ Senior leaders include vice-presidents, executives, and the c-suite.

Talent Acquisition and Retention

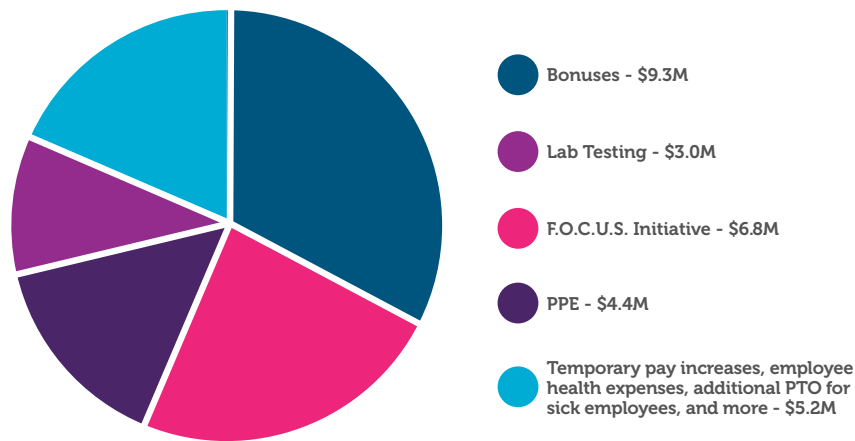
Wellpath experienced significant growth in 2021 including our State and Federal division welcoming the Michigan and Georgia DOC. These new partnerships brought 1,300 new team members to the Wellpath family.

Throughout the year, our Talent Acquisition team worked diligently to ensure sufficient staffing to meet our patients’ and partners’ needs. In addition, we took bold action to hire and retain top talent.

In 2021, Wellpath:

- **Launched our F.O.C.U.S. initiative** to support our hardest-hit sites that sustained significant retention losses. F.O.C.U.S. dollars increase pay differentials and bonuses to nurses and other essential team members in these communities.
- **Implemented bonuses, wage increases, and temporary differentials** in cooperation with our partners to supplement base compensation for nurses in many of our locations.

\$28.7M Dollars Invested in Pay and Supplies



- **Offered one-time bonuses** to site leaders, such as HSAs, directors of nursing, and RDOs, to recognize their extraordinary commitment.
- **Reset wages** for our team members to reflect “the new normal” for health-care employment and moved staff into the top quartile for compensation whenever possible.

Talent Acquisition and Retention Techniques

Wellpath uses industry-leading talent acquisition and employee retention techniques to 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 family. Our skilled and responsive HR professionals facilitate recruitment, development, and retention.

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 insights from clinical and operational specialists. Wellpath performs primary source verification of credentials and licensure concurrently during the interviewing and screening process. We then select the best candidates based on qualifications, credentials, experience, references, interview results, and other objective data points.

Most healthcare professionals choose to join the Wellpath family to:

- **Make a difference** – For those whose calling is to serve others, this is their moment—not only to advance their career, but also to join a mission that aligns with their own.
- **Work at the top of their license** – Our healthcare professionals blend the work of general practitioners and specialists. They become experts in treating chronic and acute conditions of all acuity levels and must use critical thinking and decisive action to address unpredictable and unique challenges every day.
- **Seize opportunities for growth** – Wellpath offers several great ways to take their next career step while making a profound difference in the lives of an underserved patient population. At Wellpath, you can do well while you do good.

PEOPLE

- **Be recognized and appreciated for their work** – Those with experience in both traditional environments and in our facilities know there is a special admiration for our people. There is a unique light in our patients' eyes. Our people do life-changing work and we strive to support them in every way we can.

National Recruiting and Sourcing Tools

Wellpath recruiters are vigilant in their search strategies for talent. We keep our pipeline full by using effective tools to identify and communicate with candidates. We use strategic media partnerships to evaluate and rotate our posting needs daily. A few of those partnerships include TextRecruit, AppFeeder, Indeed, and Connect, a Contact Relationship Management (CRM) program for engaging passive talent.

Wellpath shares job postings and information across dozens of recruiting databases and job sites through a single source. Our strategic use of various databases ensures a continuous feed of the newest resumes and candidates into an applicant tracking system our recruiters use to find the best candidates in the shortest amount of time.

We invest in technology to promote our open positions and provide industry-leading people analytics. This helps us understand the growing needs in staffing and the outcomes of our efforts. Our Talent Acquisition team has a full candidate marketing plan using a multitude of resources, including:

- Indeed, Glassdoor, LinkedIn, Facebook, and Instagram
- Digital advertising on Google and YouTube
- Google Remarketing and YouTube campaigns
- Hiring Events and Targeted Ads
- Text, web-based landing pages, and internet radio advertising

Innovative Talent Acquisition Strategies

We identify and recruit talented staff to provide compassionate, quality care to our patients; however, the pandemic, nursing shortages, wage challenges, and impacts of the Great Resignation have pressured recruitment and retention. We implemented creative strategies to attract the nurses and providers we need as part of our teams to deliver quality patient care.

- **Incumbent Recruiting** – When we bring on a new partner we strive to retain existing, or incumbent, team members to stay on and join our team. We carefully vet all professionals to ensure they meet our clinical standards and are a cultural fit.



incumbent team members retained from new contracts in 2021 (more than five times that of 2020)



promotions at Wellpath during 2021

- **Internal Recruiting** – We develop leaders and encourage professional growth. We encourage team members to continue their training and development by providing growth opportunities and posting job openings internally.
- **Travel Nurse Program** – Wellpath uses flexible strategies to address the current labor shortage and expand our talent search. Wellpath has 20 travel nurses across the country. Dedicated travel nursing recruiters seek talent willing and able to travel and work in specific regions. These nurses receive competitive compensation with flexible contract terms of four weeks or longer.
- **PRN Agreement Pilot** – In 2021, we piloted and enhanced the PRN program to improve staff availability and increase compensation for nurses who increased their commitment. In December 2021, 23 PRN nurses joined the program. We scheduled 96 shifts from this program.
- **Academic Affiliations** – A key part of our recruitment plan includes partnering with local colleges and universities, including the Morehouse School of Medicine (an HBCU), Mercer University, Emory University, and the Augusta University Physician Assistant School to attract healthcare professionals

PEOPLE

for a career at Wellpath. We have implemented nurse residency programs at partner facilities and established provider-level residency programs for physicians, psychiatrists, and dentists. Today we have more than 100 clinical affiliations with nursing schools and more than 50 psychiatric and behavioral health schools. Wellpath leaders regularly engage with academic institutions. Many serve as faculty at the Morehouse School of Medicine, Mercer University, the Medical University of South Carolina, Florida International University, the University of Maryland, Boston University, Simmons College, and Vanderbilt University.

Wellpath initiated a master's degree in justice-served healthcare program at the Morehouse School of Medicine to develop talent for these specific environments.

- **Veterans** – We seek veterans and their unique skills to succeed at Wellpath. They have strong leadership and technical skills and perform well under pressure. Veterans respect policies, procedures, and hierarchies, and value integrity and commitment. Last year, 416 Wellpath team members self-identified as veterans.
- **Student Externships** – Wellpath supports internships, practicums, and clinical rotations for various clinical disciplines. By offering training experiences to students interested in serving their communities, we have attracted, and invested in our interns to become valuable team members after graduation. We have had notable success motivating and supervising new graduates to licensure. By building interest in Wellpath in the community, we can recruit healthcare providers who may have otherwise overlooked this rewarding career option.
- **Mental Health Professionals** – We provide opportunities for mental health professionals with provisional licenses to obtain their required supervised work experiences working under experienced Wellpath providers at our sites.

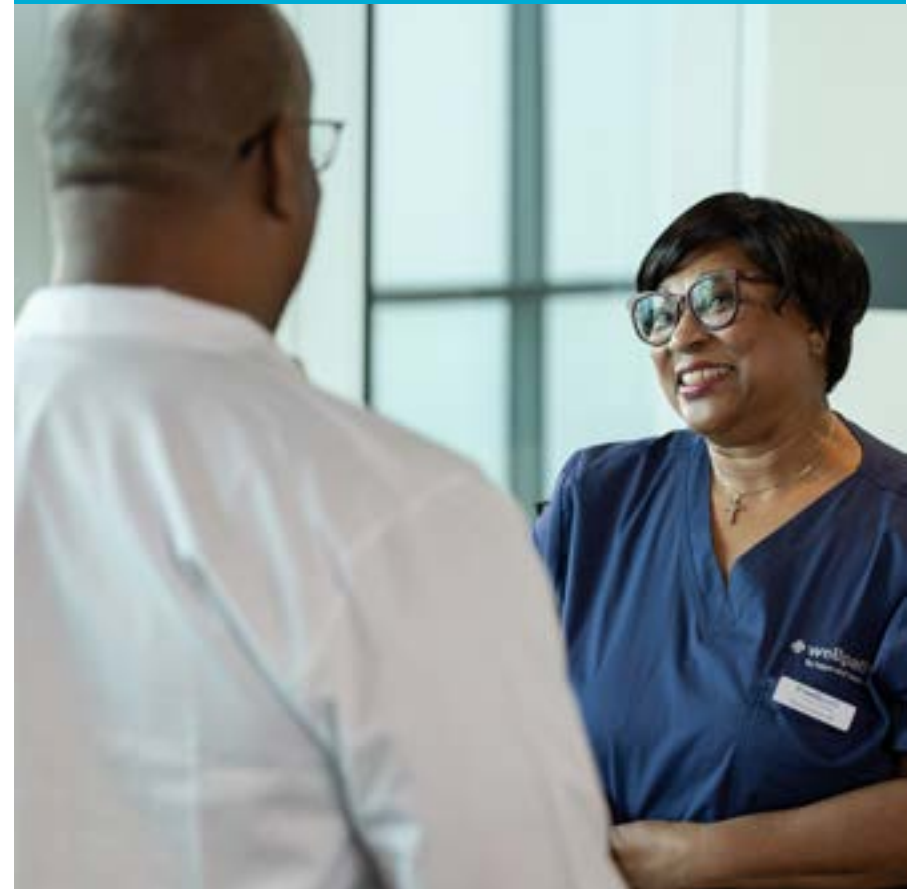
Culture and Retention

One of our ESG goals in 2021 was to lower turnover, reduce replacement costs, enhance training, and strengthen team spirit. We have launched a pilot program in our local government division to help achieve this goal, using the Team Member Employee Ambassador Methodology (TEA). The program emphasizes a more personalized and experiential onboarding process and a retention component that reminds new team members that they are part of an extraordinary team.



77.8%

retention of team members with over one year of tenure



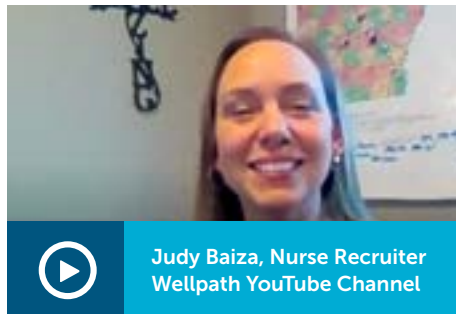
Development and Engagement

Wellpath continues to develop tomorrow’s leaders. Our dedicated Wellpath Learning and Organizational Development (L&OD) department offers training programs, continuing education, clinical exposure, promotion preparation, succession planning, and peer reviews.

When we identify team members with the potential to serve in future roles, we balance formal training activities with experiential-based assignments, including formalized programs designed to develop talent specific to our needs.

We are attentive to the development and professional satisfaction of our team members. This dedication helps:

- Strengthen team spirit through mutual respect
- Recognize individual contributions
- Improve how we provide patient care and services in our communities
- Reduce turnover and costs of replacement and training



Our 2021 L&OD activities, programs, and tools included:

- **RDO Development** – In 2021, 25 RDOs in our Local Government division completed a six-month development program focused on strategic thinking, planning, and talent development. It also included a 360° assessment and workshop based on the book “The Leadership Challenge” by Kouzes and Posner. Several participants were recognized for their leadership skills and moved to larger regions. One became a regional vice president, and another was named Local Government Leader of the Year.
- **LEAD for Managers** – Wellpath started a pilot program in 2021 called LEAD for Managers. Thirty leaders participated from throughout our organization. This program is based on an award-winning and proven content platform to deliver a personalized experience for each leader to assess and build on

their strengths and challenges. Leaders take a self-assessment and are subsequently provided with online learning recommendations. Participants can expand their knowledge, skills, and abilities in common management and leadership challenges such as coaching, delegating, engagement, managing performance, conflict resolution, and more. In addition to the self-paced learning, leaders participated in a virtual workshop, “Leadership is Everyone’s Business,” based on the book “The Leadership Challenge”.



- **Performance Evaluation** – Performance management defines work, sets expectations, exchanges feedback, and evaluates outcomes. Our annual performance evaluation program for leaders includes Specific, Measurable, Achievable, Relevant, and Time-Bound (SMART) goals aligned with company objectives. Our program also reflects the Wellpath 5Hs: Humility, Honesty, Hunger, Hard Work, and Humor. We encourage quarterly conversations on how work is being completed and progress on our goals.
- **Wellpath Academy** – Wellpath offers role-specific and compliance-based online training programs and services. We offer emerging and incumbent leader programs such as “New Leader Orientation” and the “Leadership Challenge”.
- **Onboarding and Development Program** – The Wellpath onboarding and development programs include basic skills training for current and aspiring managers. Our programs provide the knowledge, skill, and confidence to deliver quality patient care in our unique environments. New team members participate in multi-day local orientations, and access cultural and role-specific onboarding through Wellpath Academy.
- **UpToDate®** – Wellpath utilizes this clinical decision support tool and learning system for evolving medicine. UpToDate® keeps staff current on changes in medicine and information about drug interactions.

PEOPLE

- **Nurse Education** – Wellpath develops and delivers nursing education through various training initiatives, including Certified Nurse Educators (CNE) independent/self-study, formal clinical education, webinars and conference calls, and corrections-specific videos. Nurses also have access to professional nursing protocols (PNPs) and Lippincott@ for comprehensive, evidence-based, step-by-step instructions to over 1,800 procedures and skills from novice to expert covering a variety of nursing specialties.

American Nurses Credentialing Center (ANCC) Accreditation

The Wellpath Nursing Education Unit is accredited as a Nursing Continuing Professional Development (NCPD) provider by the ANCC Commission on Accreditation. Accredited organizations use evidence-based criteria to plan, implement, and evaluate the highest quality NCPD, which improves nursing practices and patient outcomes. Nurses can apply their Wellpath Nursing Education Unit training to meet certification or licensure requirements.

BrainFood: Snacks and Facts Series

In 2021, our mental health leaders created a new webinar series to improve patient care, nourish curiosity, promote community, and enhance professional and personal growth. Each month there is a mental health professional interview and a presentation on a specific mental health topic.

Topics have included:

- Jail-Based Competency Restoration
- Social Resiliency Model
- SDoH
- Trauma
- Mindfulness Training

Wellpath Listens and Learns from Surveys

Taking care of our team members starts with knowing what matters most to them. Healthy communication is two-way, and we listen to everyone's ideas at Wellpath. We use surveys and focus groups to help us connect, engage, and listen.

Under the branding of Wellpath Listens, our onboarding, annual engagement, pulse, and topic-related (e.g., pandemic and social equity) surveys periodically



“check-in” with team members and ensure we consider their opinions, satisfaction, and concerns. A cross-functional team of Wellpath experts develops and executes these surveys to ensure they accurately capture and access team member satisfaction and feedback.

We conduct surveys at critical moments in the team member lifecycle. In 2021, we revised our exit survey and rolled out progressive lifecycle (30-day, 60-day, 90-day, and 6-month) surveys gathering focused data on training, culture, engagement, recognition, and manager effectiveness. Survey feedback and data help create action plans and company-wide initiatives that achieve the right behavioral and business outcomes to improve Wellpath.



Team Member Engagement Survey

The 2021 engagement survey used the “Essentials of High-Performance” model to focus on engagement, leadership, and equip factors. We correlated each survey item against the employee engagement index using the Priority Analysis Methodology for key drivers of engagement to ensure our team members feel connected with our vision.

PEOPLE

In the 2021 survey, we increased participation by 25% and used benchmarks from hundreds of other healthcare companies¹. Relative to the benchmarks, Wellpath is five points above on appropriate recognition. In summary, we learned:

The highest scoring survey items were:

- Team member satisfaction with Wellpath as a place to work
- Training to do jobs effectively
- Their job makes good use of their talents, skills, and abilities
- Team members have the materials, equipment, technology, etc., to be effective

Survey results indicate Wellpath Team Members feel:

- They are treated with dignity and respect
- They have the right training and access to resources
- They are more satisfied with our efforts to maintain a safe and secure work environment
- The company has an increased focus on inclusion (up 5% from 2020)

Recognition

At Wellpath, we take the time to spotlight team member contributions to patients and communities. Throughout the year, we shine a light on the great work done by our healthcare heroes. Wellpath 2021 Recognition Moments included:



- Nurses Week
- Mental Health Professionals Week
- Years of Service Awards
- 5H Awards that celebrate our core values
- Above and Beyond Award



In 2021, we partnered with John's Crazy Socks to provide Mental Health Professional Week gifts. John's Crazy Socks is a father-son venture inspired by co-founder John Lee Cronin, a young man with Down Syndrome. John's affinity for "crazy" socks (colorful prints and patterns) paired with his love of making people smile drive the company's mission to spread happiness and demonstrate what people with intellectual disabilities can do. As well as being a successful entrepreneur, John has been an active member of the Special Olympics his entire life. John's Crazy Socks proudly contributes 5% of its annual revenue to the Special Olympics.

¹ Benchmark established by Worforce Sciences Associates

Health and Well-being

Our industry-competitive Total Rewards program supports team members' financial, physical, and emotional well-being. We offer various company-sponsored and voluntary health benefits, discounts, and career development tools to support an array of member needs. We evaluate our programs annually and welcome thoughtful changes.

- **Compensation** – We compensate team members fairly for their contributions. Team members put patients first on the frontlines of healthcare every day. Our responsibility is to ensure competitive wages to continue attracting and retaining team members. Our nurses are, on average, paid above the market median.
- **Minimum Wage** – Wellpath currently pays a minimum wage of \$12.62 an hour, greater than that paid in 44 states and 74% greater than the federal

minimum wage. We plan to increase that amount to \$13 an hour in 2022 and \$15 an hour by 2024.

- **Health Benefits** – We provide competitive benefits at affordable rates, covering approximately 73% of overall employee health costs, and subsidize a larger portion of the healthcare cost for staff with lower incomes. We offer a health savings account option that allows employees to make pre-tax contributions to pay for doctor's visits and other medical expenses. In 2021, we also launched a unique benefit to support our team members and their families diagnosed with cancer to assist with all stages of the process from finding providers to managing billing and claims.
- **Wellness** – Through the Wellness Café, professionals across the company offer short, weekly guided wellness activities like meditation, mental activity, or physical exercise to encourage self-care and overall wellness.



Support Programs

Our support programs cater to both the economic and educational needs of our team members.

- **Dare2Care Employee Assistance Fund** – Dare2Care is our assistance fund for team members who need help. Established in 2010, the fund helps colleagues facing economic hardship in certain unexpected circumstances. Caring for our patients and each other is at the heart of what we do. Wellpath team members and partners can contribute to the fund one time or pledge biweekly donations through payroll deduction. In 2021, 259 employees received \$202,000.



Dare2Care

Since inception there have been 1,249 disbursements totaling \$1.5 million dollars.

- **Tuition Assistance and Scholarships** – Wellpath offers full-time team members the opportunity for financial assistance for job-related coursework completed in pursuit of a degree or diploma from an accredited college, university, or higher education institution, after six months of employment. Wellpath reimburses up to \$2,000 in a rolling 12-month period. In 2021, we paid \$248,000 in tuition assistance.
- **Wellpath Scholarship Program** – The Wellpath Scholarship Program strives to impact our team members and their families by helping deserving students afford higher education. This program awards seven \$2,500 scholarships, or \$17,500 annually, to children of Wellpath team members. We have awarded 59 scholarships worth \$147,500 since inception.

Introducing Concierge Services

Another way we help people is through a centralized support team and Concierge Services center so that our site leaders and healthcare professionals focus



on “Patients, not Paperwork.” For example, our Concierge Services allow site leaders to spend less time scheduling and doing paperwork, and more time providing leadership to their healthcare team.

In 2022, we plan to implement an integrated Human Capital Management (HCM) system to provide access to what team members and leaders need – benefits, time scheduling, etc. – without going through HR for every detail. This system will coordinate staffing coverage in real-time, streamline management work for leaders, and provide analytics to help leaders build better programs to engage and develop their teams.

Wellpath Leadership Advisory Council

The Leadership Advisory Council is a standing committee that ensures a strong connection between the field and home office relative to new initiatives and

changes to existing policies, processes, and procedures. The council limits its activities to advising on matters that directly concern managers and team members in operations. The council gives advice and recommendations to sponsors and owners of initiatives, processes, and procedures.

The purpose of this advisory council is to:

- Obtain input and perspectives from the field during the design phase of initiatives, processes, and procedures to help ensure they will work as intended.
- Provide a feedback loop mechanism between the field and home office.
- Eliminate the need for each project to create its own advisory group.
- Seek guidance to inform change management plans to help ensure adoption and realize benefits.
- Gain buy-in for initiatives early in their development.
- Provide feedback on the effectiveness of programs, policies and processes, and on the support provided by the home office.

The Leadership Advisory Council:

- Includes high-performing and emerging front-line and second-level leaders representing the different divisions.
- Provides sponsors and owners with objective information and opinions about the organization.
- Provides input, knowledge, and context about field needs related to the initiative, process, and procedure being discussed.
- Serve as champions for the initiatives, processes, and procedures.

Wellpath Nurse Advisory Council

The Wellpath Nurse Advisory Council is composed of 12 nurses from 12 different sites across all divisions. It utilizes a shared governance decision making model which empowers our team to contribute to the nursing practices and positively influence the work environment for our nursing team members.

Benefits of the Nurse Advisory Council include:

- Improved communication from the field during the design phase of initiatives, processes, and procedures to help ensure they will work as intended.
- Enhanced change management and ownership for successful implementation and sustainability.
- Reduced turnover and improved employee engagement and satisfaction.



Wellpath Nurse Preceptor Program

In 2021, Wellpath launched a new Nurse Preceptor Program. This program is one of the ways Wellpath promotes the availability and quality of nursing careers. It recognizes the challenges of correctional medicine and provides unique training and mentorship for new nurses to provide innovative patient care. It also gives nurses a pathway to leadership and career development.

Our inaugural class of nurse preceptors will graduate in mid-2022. We will expand this program to provide comprehensive training of preceptors across the organization. Selected preceptors participate in e-learning and in-person training to develop the knowledge, skills, and practices to build an industry-leading nursing workforce.

The Wellpath clinical nursing leadership team has developed our comprehensive preceptor program. Graduates of the program receive a handbook that highlights valuable information, including:

- The Wellpath Way (our mission, vision, and values)
- The roles and responsibilities of a preceptor
- Preceptor training policies
- Preceptor training experience
- Tools to guide the effectiveness of preceptors

Preceptors have access to Lippincott, a best-in-class web-based resource to access policies, practices, and clinical information necessary to ensure clinical excellence.

Team Member Safety

We provide a safe and healthy environment for medical and correctional staff and patients. Employees receive regular training aimed at promoting personal safety and well-being. Security is an essential part of risk management in the correctional environment. We train new employees and subcontractors on safety and security in a correctional setting.

Our Injury and Illness Prevention Program addresses:

- Responsibility
- Compliance
- Communications
- Hazard assessment
- Accident/exposure investigation
- Hazard correction
- Ongoing training
- Recordkeeping

2021 Health and Safety Key Metrics¹

	Correctional Institutions (State Government) ²	Nursing and Residential Care Facilities (State Government) ²	Wellpath
Total recordable incident rate (TRIR)	9.2	13.7	4.4
Days away, restricted, or transferred (DART) rate	6.4	9.7	1.7
Lost Time Incident Rate (LTIR)	6.0	8.5	1.0

¹Data for additional health and safety metrics can be found in Chapter 8.

²U.S. Bureau of Labor Statics, 2020 Benchmarks. The North American Industry Classification System (NAICS) codes presented are: 623 – Nursing and residential care services and 92214 – Correction institutions.

We work with insurance carriers to create a national benchmark for correctional healthcare. To promote a process of evaluation, improvement, and safety, we track key metrics, including:

- TRIR
- DART rate
- LTIR
- Work-related injury fatalities
- High consequence injuries
- Locations with no injuries

Each team member has a role in preventing workplace injuries and illnesses by understanding and complying with the safety program requirements. Team members can report safety hazards without fear of retribution. No job is so important – or any service so urgent – that we cannot take time to work safely.

A location-specific safety committee meets monthly to review inspection and accident investigation results, and discuss hazards and exposures. Each committee makes recommendations to management for preventing future incidents.

2021 Safety Training^{1,2}

Number of safety courses completed ³	53,397
Number of safety training hours completed ⁴	23,365

¹ Courses include the following topics OSHA-related topics: Active Shooter, Hazard Communications, Bloodborne Pathogens, Emergency and Disaster Preparedness, Security Awareness, Infection Prevention and Control, Injury and Illness Prevention, and Violence Prevention in Healthcare.

² The number of safety courses completed and corresponding number of safety training hours for 2020 have been updated from the values reported in the 2020 ESG Report due to a historical records review. Updated values can be found in the Performance section.

³ Number of courses completed by active employees during the reporting year. Training year is from March 1st through February 28th.

⁴ Number of hours for completed course are per estimated completion time.



Chapter 5

Partners



“Relationships are based on four principles: respect, understanding, acceptance, and appreciation.”
– Mahatma Gandhi

Successful Partnerships

Partner Retention

Industry Partnerships

Operational Improvements

We Are Proud Healthcare “Fixers”

Consultation Services

Philanthropic Efforts

Case Study

PARTNERS

Our strategy to help the most people requires exceptional partnerships. We do not typically use the words “customers” and “clients.” Success requires an ever-growing family of partners with a shared vision to help people and make a difference in our communities.

Successful Partnerships

Wellpath typically provides patient care in facilities operated by our partners. We must collaborate, cooperate, and work seamlessly with them to ensure effective and efficient care of our shared patients.

Our Mantra is “Always Do The Right Thing.” This mantra is more than an aspirational company tagline; it was assigned to us by one of our long-term partners, who stated: “What I appreciate most about working with you is I can count on you to always do the right thing.”

This mantra is about excellence in everything we do – from the exam room to the corporate boardroom. Our patients, people, and partners work together to provide excellent care to a fragile patient population.

Partner Retention

Wellpath patient care excellence is represented in our partner retention. At Wellpath, our partner satisfaction and retention are exemplary. On average, we retain approximately 95% of our existing partner agency revenue year over year. Our partners stay with us and often ask us to enhance and expand our services because we provide quality care. In 2021, we added new staff or services in 57 partner agencies.



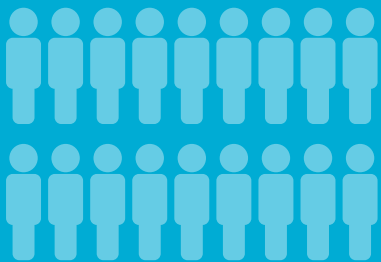
Wellpath retained approximately 95% of our existing partner agency revenue in 2021.

“Wellpath’s commitment to providing the best possible care and their responsiveness in doing so makes this an extremely successful partnership.”

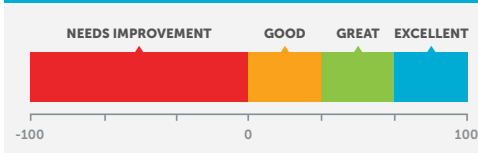
Rory Griffin, Deputy Director, Arkansas DOC



In 2021, our average Net Promoter Score was 49.90 based on 960 recorded scores.



What is a good NPS?



Net Promoter Score (NPS) Surveys – We continually measure partner satisfaction with tools like NPS, which is used by thousands of companies worldwide, including two-thirds of the Fortune 1000 companies. NPS measures partner satisfaction from a much higher bar: “How likely, on a 0-10 scale, would you be to recommend Wellpath to a colleague?” (the “NPS Question”).

Wellpath seeks feedback from multiple partners during on-site visits and through surveys. We train our team members to ask this important question: “If you didn’t give us a 9 or 10, what do we need to get there?” We do not avoid critical partner input; instead, we identify opportunities to improve our services. We want every person at every partner site to be a Wellpath promoter. We reflect, analyze, and react to ensure awareness of the strengths and opportunities we should act on after listening to our partners. NPS results range from +100 (100% promoters) to -100 (100% detractors). The most admired companies in the world generally achieve scores in the 50s, 60s, or 70s.

Wellpath tracks rolling NPS results quarterly. By including NPS in the fiber of our partner relationships, we expect to improve our underlying partner satisfaction by identifying and resolving issues before they can become significant problems.

Industry Partnerships

Wellpath has strong connections with industry-leading associations like NCCHC, ACA, ANCC, and National Alliance on Mental Illness (NAMI). We have helped the NCCHC develop standards, accreditation surveys, and training for lead surveyors. Typically, more than 50 Wellpath team members attend the annual NCCHC conference for training or as presenters and educational session leaders.

Wellpath is the only correctional healthcare organization accredited by the ANCC to ensure excellence in NCPD. The Wellpath Nursing Education Unit passed a systematic, comprehensive peer review, met the ANCC standards, and was confirmed by the Commission on Accreditation.

Our chief nursing officer (CNO), Heather Norman, serves on the Board of Directors for the American Correctional Nurses Association (ACNA), and also serves as the Chair for their Special Projects Committee.



Heather E. Norman

Wellpath Chief Nursing Officer MSN, RN, MBA, NE-BC, CNL

Operational Improvements

We constantly look for ways to enhance our clinical and operational efforts. From technological innovations to enhanced site support, we strive to help as many people as possible.

Technological Innovations

Wellpath Healthcare Cloud – Our innovative technology solution, the Wellpath Healthcare Cloud, which is composed of Wellpath Connect, Wellpath Telehealth, Wellpath Now, and the Wellpath COEs, helps us to provide the services our patients need in the most efficient and effective way possible. The COEs focus on HIV, HCV, oncology, and autoimmune diseases. In 2021, we developed COEs to support the following:

- 25 Arkansas DOC and Community Correction sites
- 6 Maine DOC sites
- 60 Georgia DOC sites
- 29 Michigan DOC sites
- 7 local government sites
- South Carolina Department of Mental Health Program

Partner Portal – Partner communication and transparency are key for a successful, long-term relationship. Our Partner Portal is a confidential, secure digital gateway



for shared communication. Site data, such as care delivery, staffing hours, intakes, health assessments, and medication passes are available online for review and comment by our partners. Those comments help us make operational adjustments going forward to help meet our partners' needs, as those needs change.

Enhanced Site Support

ACE Team

The ACE Team, which stands for Achieving Clinical Excellence, provides clinic support and implements new contract requirements. The ACE team members:

- Create operating procedures, site-specific programs, and CQI toolkits
- Monitor risk factors
- Mentor site leaders
- Share best practices
- Assist with root-cause analyses and corrective action plans
- Monitor key performance indicators (KPIs) to identify trends, accreditation tracking, and more

Wellpath Warriors

Wellpath Warriors are carefully selected and trained teams serving as Wellpath care and culture ambassadors. They assist with contract start-ups across the country and help implement crucial systems and processes to transition new Wellpath sites. Training includes:

- Administration
- Policies and procedures
- Receiving screening
- Health assessment – Clinical Institute Withdrawal Assessment (CIWA)/Computers on Wheels (COWs)
- Appropriate use of Safety Cell
- Pregnancy
- Suicide prevention emergency response
- Medication administration and bridging
- Sick call

We Are Proud Healthcare “Fixers”

It is common for new partners to ask for help improving or revamping a broken healthcare program. Wellpath collaborates with new partners to redesign and establish new and improved healthcare programs that deliver quality care. We are known for turning programs around, a key reason we have experienced steady growth.

The “Turn Around” in Milwaukee County

When Wellpath took over operation of the Milwaukee County healthcare program, the facility had been under a consent decree since 2001. The previous provider was not meeting the client’s expectations or the patients’ needs. There had not been a psychiatrist on-site for more than a year and more than 60% of their staff were agency nurses. We started recruiting immediately upon transition and focused on onboarding for all the new staff we added. In our first year, we reduced the vacancy rate from more than 60% at contract start to less than 3%. Our site leadership worked to increase morale to foster a culture of caring and acceptance, forming a “Milwaukee Strong” employee committee to engage team members and reward their hard work. In May 2021, the Jail’s medical program received NCCHC accreditation.

“As Milwaukee County Sheriff, I am committed to ensuring that everyone entrusted to our care is treated with dignity and respect and receives the best medical services available. Today’s achievement recognizes that the dedicated correctional professionals of the Milwaukee County Sheriff’s Office have spared no effort in transforming the Milwaukee County Jail into a facility that recognizes the dignity and worth of everyone, and it stands as testament to the exemplary performance and partnership with Milwaukee County’s health care provider, Wellpath.”

Earnell R. Lucas

Milwaukee County Sheriff



Dr. Enid Trotman, our Milwaukee County Medical Director, was awarded with our Physician of the Year award in 2021.



Consultation Services

Our consultation services review existing programs and advise on aspects of the healthcare delivery system. Services include evaluations and recommendations for new programs or architectural plans, staffing patterns for new facilities, alternate pharmaceutical, and other systems.

Wellpath is known for implementing innovative operational and clinical initiatives and providing partners with effective strategic planning services based on our experience. Our corporate management team, has accumulated years of experience developing and operating healthcare units in facilities at the federal, state, county, and municipal level.

New Medical Facilities

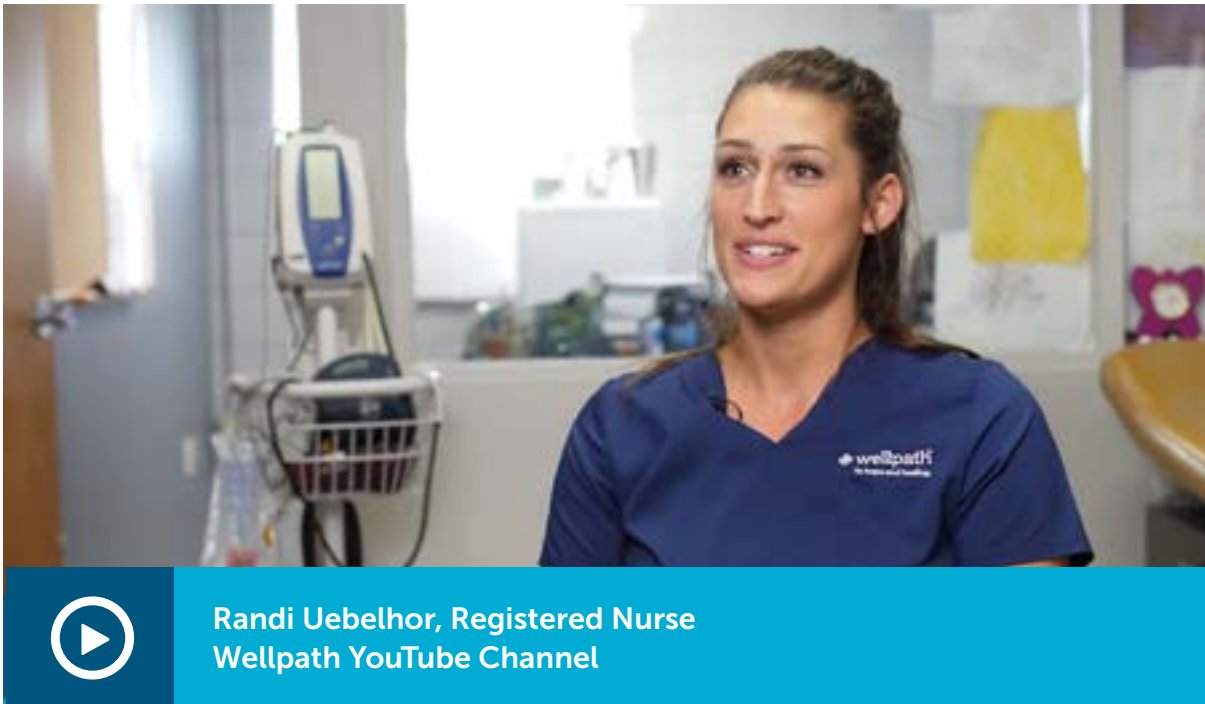
Should a partner decide to build a new facility or expand existing space, we can recommend staffing and offer consultation services regarding the design of the medical area(s). This can increase efficiency for healthcare and correctional staff operations, resulting in additional cost savings for our partner. Wellpath will assign a designated liaison to attend relevant meetings about future facility renovations or construction and the subsequent transition of services. We have historically collaborated in designing new medical facilities in Mecklenburg County, North Carolina; Davidson and Shelby Counties in Tennessee; Orleans Parish, Louisiana; and Will and McHenry Counties in Illinois. Wellpath Recovery Solutions designed the buildings for the Columbia Regional Care Center and Treasure Coast Forensic Treatment Center. We designed, built, and operate the South Florida State Hospital, Montgomery County Mental Health Treatment Facility, South Florida Evaluation & Treatment Center, Florida Civil Commitment Center, and South Carolina Civil Commitment Center.

Philanthropic Efforts

Our partnerships go beyond the walls of the facilities in which our dedicated caregivers work. On any given day, in cities and towns across the country, our team members can be found in the community volunteering their time to those in need, including children, the homeless, and the elderly. We have developed a true culture of caring that extends deep into the communities we serve. The people in our facilities are active members of their communities.

- In Merced County, California, our team participated in the annual toy drive and the Run for the Fallen, honoring peace officers. Wellpath sponsored a veteran for the Central Valley Honor Flight program through an annual Veterans Garage Sale and provided meals at the D Street Homeless Shelter. We also supported the Merced County Operation Christmas Star event by giving gifts to 815 families, including 2,674 children.
- In Oakland County, Michigan, our clinical staff working in the sheriff's department hosted a holiday collection to benefit a local organization. This year, we hosted a book drive for an early intervention outreach program, Oakland Family Services. Wellpath proudly sponsored the Frank Knasiak Memorial Golf Outing, to support a variety of community groups such as food banks and domestic violence shelters. We also worked with the Oakland County Animal Shelter.
- In Key West, Florida, Wellpath team members participated in the Thanksgiving Back to Key West Fundraiser, with all proceeds benefitting the Keys Learning Center and Michelle's Foundation. Michelle's Foundation was established in honor of Michelle Keevan Halpern to help children achieve their highest potential. Keys Learning Center helps students with test preparation, credits, math, reading, behavior, or other issues causing educational advancement.
- In Richmond, South Carolina, Wellpath team members participated in the Central Savannah River Area (CSRA) Heart Walk. We also supported the American Heart Association Women of Impact Campaign to place two cardiopulmonary resuscitation (CPR) kits at local High Schools.
- In New Orleans, Louisiana, our team members donated time to an annual health fair, donated to the Battered Women's Shelter, spearheaded an annual Christmas Toy Drive, volunteered for the medical stops at the annual Zulu Run/Walk, and volunteered at the annual local Easter Egg Hunt.





Randi Uebelhor, Registered Nurse
Wellpath YouTube Channel

Case Study

Partnership with Norton Healthcare – Kentucky DOC Oncology Program

Wellpath identified unusually high rates of cancer diagnoses and treatments among patients incarcerated within the 12 facilities across the state. Wellpath partnered with Norton Healthcare, a local oncology team, and has an on-site chemotherapy-certified advanced registered nurse practitioner (ARNP) to establish a total oncology care program.

This program provides patients with a treatment plan developed by the oncology team and with access to on-site chemotherapy at the Kentucky State Reformatory (KSR). In 2021, 48 patients were treated through this program. Oncology services include infused chemotherapy and immunotherapy, injections, oral chemotherapy medications, and radiation therapy.



2021 Key Figures

- 75% remission rate
- 48 patients treated
- 102 telehealth sessions
- 457 on-site patient encounters
- 493 off-site patient encounters



Chapter 6

Process



“Integrity is doing the right thing, even if nobody is watching.”
– Jim Stovall



Corporate Governance



Corporate Compliance Program



Ethical Business Practices



Privacy and Data Security



Procurement

Corporate Governance

Our corporate governance policies protect and promote integrity by communicating clear guidelines to train and educate team members regarding compliance and good business practices.

Corporate governance is our foundation for ethical behavior and integrity. Wellpath reduces risk while improving effectiveness, security, and compliance utilizing an approach that integrates ethics and compliance into our daily operations. Our policies, procedures, and other governing documents create a system that encourages transparency, accountability, fairness, and trust in our business operations. The Board reviews and approves our corporate governance practices to align with our business strategies, social responsibilities, cultural and financial goals, and stakeholders' best interests.



PROCESS

The Board

Our independent and diverse Board helps consider the various stakeholders, including our patients and partners. Our business and affairs are overseen by The Board, with nine members; three are independent. Four Board members represent women or minority constituencies. Two are practicing physicians, and one is a former member of Congress and a vocal advocate for improved access to behavioral healthcare in the U.S. Our CEO and our president are the only members of The Board who are Wellpath employees.

The majority shareholder of Wellpath elects Board members who serve until voluntary resignation or removal by the majority shareholder.

The Board's Composition

Women **22%**

Black/African American **11%**

Hispanic/Latino **11%**

Asian **11%**

Independent Individuals **33%**

Combined Professional Experience **261 Years**

The Board meets quarterly. Designated committees provide specific guidance and oversight to defined segments of Wellpath's operations/business. They include the Compensation Committee, Legal and Risk Committee, Compliance Committee, Audit Committee, and Partnership Committee. Board members elect officers and set the strategic direction for the Company's management team.

Executive Team

The Wellpath executive team executes a strategic plan adopted by The Board and oversees day-to-day operations. The executive team is led by and includes the CEO, president, chief financial officer (CFO), chief legal officer (CLO), chief operating officer (COO), chief human resources officer (CHRO), chief information officer (CIO), and the CCO. The executive team's role is to execute on the strategic plan.

The executive team meets to discuss potential business opportunities, material risks or compliance concerns, social issues affecting patients, employees, partners, budgetary and capital matters, and proposed policy changes. The CEO reports appropriate information to The Board.

Patient welfare drives executive team decisions. Our CCO, a licensed and practicing physician, oversees policies, procedures, and decisions regarding the delivery of clinical patient care.

Our "patients-first" culture fostered by The Board means our frontline professionals treat patients as they would their family members. Our team makes decisions on evidence-based best practices and patients' best interests, without regard to cost or financial results.



Thomas Pangburn, MD
Chief Clinical Officer

Patient welfare drives executive team decisions. Our CCO, a licensed and practicing physician, oversees policies, procedures, and decisions regarding the practice of clinical patient care.

PROCESS

Corporate Responsibility Oversight

The Board sets strategic goals and KPIs for the executive team's daily management in conjunction with the ESG Steering Committee. The ESG Steering Committee comprises our CEO, president, COO, and CFO. The Committee's mission is to achieve The Board's strategic ESG goals, monitor KPIs, and oversee all ESG-related initiatives. The ESG Steering Committee supports decision-making at the company's highest level to influence positive changes for ESG issues.

Risk Oversight

The Board provides risk oversight, delegating it to the Legal and Risk Committee and the Board Compliance Committee. The executive team executes risk mitigation strategy with daily activities managed through the Legal/Risk and Management Compliance Committees.

On a day-to-day basis, the Wellpath legal, claims, continuous quality improvement, and compliance teams identify risks through ongoing analysis and review of key metrics, including claims data, investigations, clinical events, compliance incident reports, annual enterprise risk assessment surveys, annual audits, and other monitoring efforts. Those teams report to the Legal/Risk, Management Compliance, and Board Compliance Committees on these metrics quarterly, along with recommended action plans and ongoing risk mitigation strategies.

Board Compliance Committee

The Board Compliance Committee assists in overseeing the company's compliance with, and handling of, matters relating to the laws and regulations applicable to the company's business. This committee reviews the effectiveness and results of the company's compliance program, which promotes a company-wide culture of compliance. The committee oversees the Company's execution on the Ethics and Compliance Plan through implementation and oversight of a robust and effective compliance program in coordination with management and the compliance department. Committee members, including the committee chair, are appointed by the board and include three or more members of The Board.

Management Compliance Committee

The Management Compliance Committee comprises trained representatives of each functional department, senior management, and members appointed by the CEO. Committee members serve at the CEO's discretion, with oversight by

the Board Compliance Committee. Acting through, and with, the assistance of the Compliance Officer, the committee can investigate, evaluate, report facts, and make recommendations to senior management regarding compliance initiatives and possible responses to investigations, including disciplinary or other adverse action for identified incidents of misconduct. The committee also reviews and evaluates information received from and recommendations developed by the Compliance Officer.



Corporate Compliance Program

The Corporate Compliance Program is an essential part of our routine operations. The program assesses business activities and consequent legal risks, educates and trains personnel, implements monitoring and reporting to measure effectiveness, and includes enforcement and discipline components to ensure compliance.

The purpose of the Corporate Compliance Program is to ensure that Wellpath complies with federal and state requirements of law and rule. The program exists to identify areas of possible concern that might adversely affect the company and works to correct those concerns.

The program incorporates the Office of Inspector General's seven elements of an effective compliance program. These elements include:

- Implementing written policies, procedures, and standards of conduct
- Designating a compliance officer and compliance committee
- Conducting effective training and education
- Developing effective lines of communication
- Conducting internal monitoring and auditing
- Enforcing standards through well-publicized disciplinary guidelines
- Responding promptly to detected offenses and taking corrective action

The compliance team works closely with the Management Compliance Committee to prioritize potential risk and implement policies and procedures that effectively reduce organizational risk. We accomplish this through ongoing monitoring of key organizational metrics, compliance incident reporting and investigations, and initial and reaccreditation audit reports and technical assistance to achieve and maintain accreditation.

Reaccreditations and Internal Site Audits

Reviews by accrediting organizations and internal audits are representative of our commitment to continual improvement. The compliance team continues to prepare sites for future surveys with additional tools and mock virtual sur-



In 2021, our compliance team helped 46 sites complete third-party reaccreditations.

veys that helped 46 sites complete third-party reaccreditations. Our compliance team also completed 60 on-site program audits and 60 remote desktop audits during 2021 and provided on-site technical support to 38 sites (two people per site for 1-2 weeks).

These reviews identified and mitigated enterprise risks that affect the organization's financial, reputational, or regulatory portfolios. These reviews crossed all lines of business to assess operational practices against established company objectives, standards, and policies. The compliance team accomplished this through various audits depending on the site's location, type of review required or requested, and relevant accreditation requirements. These reviews encourage the development and introduction of best practices throughout Wellpath.

Training

Members of The Board, officers, employees, agents, and consultants participate in our corporate compliance training program. They complete initial training upon appointment or hire, as well as annual training, as needed or required by policies, procedures, and regulatory changes. Compliance training focuses on the components of our Code of Business Conduct and Ethics (Code), corporate compliance topics, and Health Insurance Portability and Accountability Act (HIPAA) privacy and security.

Our Compliance Training Policy ensures that training courses are issued at various levels of the organization and cover relevant company and ethical topics – including the Code and focused patient quality education for clinicians.

Communication

Wellpath has established effective lines of communication essential for a successful compliance program. Suspected non-compliance can be reported



directly to the compliance department or through our compliance hotline. These reports can be made anonymously to protect the individual reporting to the fullest extent allowed by law. The compliance department monitors calls and emails sent to the hotline, investigates reports, and provides summary reports to the management and board compliance committees. Signs are posted at each site to ensure colleagues know how to report a potential compliance concern.

2021 Key Compliance Program Accomplishments

- 100% reaccreditation rate
- Investigated and closed more than 105 compliance incident reports
- Completed 60 on-site program audits and 60 remote desktop audits
- Provided on-site technical support to 38 sites (two people per site for 1-2 weeks)
- Provided start-up support and on-site training for two months for Georgia DOC

Investigations and Reporting

Wellpath provides employees with a confidential, non-retaliatory manner to report potential compliance issues. Every team member has a responsibility to report potential non-compliance. The compliance department has a Compliance Hotline Policy that describes the various means to report concerns confidentially and even anonymously, if preferred. To ensure that issues are easily communicated and thoroughly investigated, the compliance and the HR departments use the EthicsPoint website and hotline to receive and resolve complaints.

Ethical Business Practices

Ethical business practices define our compliance and risk mitigation efforts. Wellpath ethics training focuses on “Always Doing The Right Thing.” Our Code helps team members understand our commitment to ethics and compliance. The Code deters wrongdoing and promotes honest and ethical conduct by team members and others performing services for Wellpath and its subsidiaries and affiliates.

Compliance with this Code promotes:

- Avoiding conflicts of interest
- Full, fair, accurate, timely, and transparent disclosure

- Compliance with applicable government and self-regulatory organization laws, rules, and regulations
- Prompt internal reporting of violations
- Accountability for compliance

Team members and partners can report online using the EthicsPoint Incident Management System or call the Compliance Hotline. Additionally, team members can complete the electronic Wellpath Incident Form or reach out to a compliance team member directly.

Corporate compliance policies and procedures, including the Code, are available on our intranet. Corporate compliance policies are reviewed annually and approved by a multidisciplinary Corporate Policy Committee.



**Always Do The
Right Thing!**

Privacy and Data Security

Our Cybersecurity Team implements and manages our security program. Our technologies and services comply with local, state, and federal security requirements as applicable. Security controls are a part of product planning and designing, networks, upgrades, and other systems. We use the latest and best tools to stay ahead of today's rapidly evolving cyber-risk landscape.

In December 2021, our payroll and timekeeping vendor, UKG, notified us of a ransomware attack that directly affected over 2,000 UKG served businesses worldwide. While the outage did not compromise Wellpath data, it did halt our access to processing payroll, and handling time sheets. In response to

the Kronos outage a multi-disciplinary team made up of 40+ key Wellpath leaders from HR, payroll, IT, and communications worked nearly around the clock, to rapidly stand-up alternative, in-house timekeeping and payroll systems to ensure team members received their paychecks.

Our EHR and support systems (e.g., finance, intranet, web-mail, etc.) provide secure tools and data storage/management by leveraging internet-based designs, secure transportation protocols, and remote connectivity in isolated or physically secure environments. Nationally recognized firms conduct business security and HIPAA security/privacy assessments and provide summaries on request. Additionally, we conduct internal quar-

terly management reviews where IT leaders work with the security team to oversee incidents and activities.

Our comprehensive cybersecurity program evaluates various technologies and processes throughout the year. This includes IT privacy access audits, periodic account reviews, and elevated account usage reviews. Our risk management program identifies, analyzes, evaluates, tracks, communicates, and manages IT risk throughout the company. This program includes regular review of key risk management components such as supply chain analysis, vendor management, security reviews of new software, and periodic configuration audits.

Cybersecurity and Privacy Training

Wellpath administers annual cybersecurity awareness training and shares monthly security awareness videos via email. We also conduct monthly phishing tests to evaluate the effectiveness of this training. We regularly evaluate our security tools and technologies to ensure that our security posture remains aligned with industry best practices.

Wellpath annual training includes HIPAA compliance, safeguards, patient rights, PHI, compliance, and breach reporting. We supplement this training with monthly electronic compliance chronicles, articles, and webinars.

Incident Response – The Security Incident Response Team (SIRT) comprises senior management personnel and experienced individuals from different divisions, including the director of information security, CIO, and chief privacy officer (CPO). The SIRT team is responsible for managing the entire incident response lifecycle by providing rapid response and recovery to security incidents.

Wellpath annual training includes HIPAA compliance, safeguards, patient rights, PHI, compliance, and breach reporting.

In 2021, Wellpath did not experience a data breach involving patient, people, or partner information, including personally identifiable information (PII) or protected health information (PHI) breaches. We had no monetary losses from legal proceedings associated with data security and privacy.

Breach Response

The SIRT team is responsible for communicating incident responses to consumers, employees, third parties, and relevant customers under the direction of Wellpath senior management, to comply with applicable laws/regulations. When a data breach is identified, the SIRT team promptly provides the required notifications.

Protection of PHI and HIPAA

Wellpath complies with HIPAA and the Security Standards for the Protection of Electronic PHI (also known as the "Security Rule"). We take our obligations under HIPAA Privacy and Security seriously. All Wellpath team members must adhere to physical, technical, and administrative safeguards established in the federal HIPAA Privacy and Security standards. Our HIPAA Privacy and Security policies protect the privacy and confidentiality of all PHI, hard copy and electronic, whenever team members use it.

Individuals requiring access to PHI in the course of their jobs must read and acknowledge the policies, attend annual HIPAA training for both privacy and security, and safeguard each patient's health information by:

- Reporting HIPAA concerns to the site department head or CPO
- Locking unattended workstations to protect computer assets
- Securing all doors (confirming no doors are propped open)
- Never sharing passwords or ID badges
- Always wearing ID badges
- Never leaving patient information unattended

We report incidents directly to the CPO or through the compliance hotline or by completing a HIPAA Incident Report Form. HIPAA Privacy and Security compliance is reported at management and board compliance committees regularly.

Our secure EHR platform maintains and transfers PHI consistent with the confidentiality and security requirements of each facility in which it is deployed. Data and information conforms with HIPAA, Health Information Technology Economic and Clinical Health (HITECH) Act, NCCHC, and Digital Asset Management (DAM) protocols and other applicable laws, rules, and regulations. Cyber data, including healthcare records, are managed and maintained within a network that uses DAM protocols and is HIPAA and NCCHC compliant. Nationally recognized

firms conduct annual Systems and Organizational Controls (SOC 1 and SOC 2) audits of our data center and biennial HIPAA risk assessments covering both privacy and security requirements.

Key Components of HIPAA Privacy and Security Program

- Review policies and procedures
- Monitor and review changes in privacy laws and regulations
- Conduct periodic compliance assessments to ensure agreements and safeguards are implemented and maintained with vendors and subcontractors
- Conduct training and audits
- Cooperate with partners and state and federal agencies, including the Office for Civil Rights of the Department of Health and Human Services, in compliance reviews or investigations.

The Wellpath Information Technology Contingency Plan includes procedures to recover IT systems following a disruption. We test our fail-over and recovery plan every six months during disaster recovery drills. All data is maintained in a secure and redundant environment to ensure accessibility and continuous maintenance of all patient information, despite natural or man-made catastrophes.

Our primary data center is co-located in a Tier 3 data center. The TierPoint data center ensures critical IT systems, applications, and data are safe from tornadoes, hurricanes, earthquakes, fires, floods, and other natural or man-made disasters. It contains state-of-the-art infrastructure to meet the highest level of reliability. This facility is audited annually under Statement on Standards for Attestation Engagement (SSAE) 18 SOC 2 Type II, Gramm-Leach-Bliley Act (GLBA), and HIPAA standards.

Wellpath does not share PHI except as allowed under HIPAA. We maintain strict compliance with HIPAA and secure business associate agreements with third parties that potentially could contact PHI. Wellpath respects that our partners own their data and does not make records available to others except when approved by them. We prepare statistical analysis reports for industry groups and others with partner permission.

Procurement

Our Procurement Team supports patient care by securing quality goods and services that meet our operational healthcare needs.

Responsible Stewardship of Funds – The Wellpath procurement department monitors supply chains, negotiates contracts with vendors, and serves as our primary buyer of goods and services. Our procurement department uses the seven-step sourcing process, which includes:

1. Conducting an internal needs analysis
2. Assessing the supplier market
3. Collecting supplier information
4. Developing a sourcing strategy
5. Implementing the sourcing strategy
6. Negotiating with suppliers and selecting the winning bid
7. Implementing a transition plan or contractual supply chain improvements

By following the seven-step sourcing process, we ensure responsible stewardship of our company's and our partners' resources and provide the best products or services, on time, at the right quantity and price.

COVID-19 caused difficulties in the global supply chain. In 2021, we continued operation of our central warehouse and distribution center in St. Louis, Missouri,

“Correctional health care services are a unique operation and need to be responsive, flexible, and committed. We continue to find Wellpath to be good stewards of the County’s funds, responsive to the needs of the agency and those we are charged with caring for, and adaptive to the shifting challenges.”

**Sheriff Tim Svenson, Yamhill County Sheriff’s Office,
McMinnville, Oregon**



which we established in 2020. It allowed us to circumvent regional supply shortages by receiving materials from international and domestic vendors and distributing those supplies to our facilities across the country. To assist our team on the frontlines with forecasting their supply needs, we established standard par levels and assisted with burn rate analysis at our sites. Our team ordered testing supplies and PPE through an online ordering portal we built to support them. We searched the open market to fulfill needs from back orders and cancelled items from our major distributors and cared for our existing equipment with ongoing maintenance programs.

Supplier Code of Conduct – Wellpath is committed to ensuring vendor partners have safe working conditions and their employees are treated with respect. In 2022, we will publish our code of conduct and continue to partner with environmentally friendly suppliers.

MCKESSON

- Wellpath partners with medical supply leader, McKesson, which was recognized by ESG analytics as one of 2021's five best ESG companies in healthcare.



Efforts to Reduce Carbon Emissions



Pollution, Waste, and Recycling



Home Office Relocation



Responsible Recycling

Chapter 7

Planet



“The Earth is what we all have in common.”
– Wendell Berry

PLANET

Wellpath strives to conserve environmental resources. We implement strategies, such as increasing on-site testing and treatments, implementing best delivery practices, optimizing shipments, and recycling to reduce the dependency on environmental resources and save taxpayer dollars. We generally do not own the buildings in which we operate, however we continue to implement strategic processes that decrease our carbon footprint. We want to leave the planet in better shape than we found it.



Efforts to Reduce Carbon Emissions

Wellpath is committed to reducing carbon emissions throughout the organization by:

- Fleet** – Our fleet comprises approximately 200 vehicles, roughly 150 of which are leased vehicles used by our RDOs to travel to and from our partner locations. The remaining vehicles are leased by our Recovery Solutions division and used for patient transport or other location maintenance activities. By implementing strategic planning, our vehicles are monitored and replaced on an as-needed basis.
- Optimization of On-Site Care** – Our care philosophy includes providing on-site care when clinically appropriate. Our on-site services include mobile radiology, on-site dialysis, and on-site physical and occupational therapy. By providing these and other group on-site services, multiple patients can be seen by one specialist which reduces the frequency of individual off-site transports. Furthermore, we are expanding our technological infrastructure, including the Wellpath Healthcare Cloud, which will continue to reduce the frequency of patient off-site transports, ultimately resulting in reduced carbon emissions.
- Fewer Deliveries** – Wellpath works with vendor partners to ensure industry best practices for shipping and delivery. Wherever possible, we leverage private distributor fleets rather than using commercial carriers. We train our team members to manage inventory and use Periodic Automatic Replenishment (PAR) levels for key items. We conduct an analysis of our procurement practices at our locations and adjust to optimize deliveries. We utilize a “Hold to Complete” process at our new locations. By scheduling one delivery with several hundred items at a time, we are able to complete our shipments with fewer vehicles.

Pollution, Waste, and Recycling

Wellpath has implemented practices to minimize the quantity of expired pharmaceuticals destroyed. We follow federal, state, and local laws and regulations when disposing of pharmaceutical waste, and we conduct audits to minimize the presence of discontinued or expired medications. We secure medical waste until it is destroyed. Our pharmaceutical providers work closely with us to ensure we have the right quantity of medications on at the right time.

Type of Asset	Number Recycled
All-in-One	564
Laptop	703
LCD Monitor	209
Printer/Copier/Fax/Scanner	80
Desktop Computers	117
Docking Station	283
Tablets	47
Networking Equipment	278
Misc. Electronics	159
Desk Phones	56
Server	21
Phone System	19
Battery Backups	24
Cell Phone	5
Medical Equipment	0
Television	2
Grand Total	2,567

Hazardous Waste Shipment Optimization

When compliant, safe, and available, Wellpath sends hazardous waste safely through the mail instead of relying on weekly vendor pick-ups.

eRecycling

Wellpath has been performing environmentally responsible electronic recycling for over 10 years. Our information security policy requires that data must be wiped from all hard drives to ensure patient and team member privacy. Wellpath currently performs our recycling with two partners, Computacenter and Excess IT Hardware (EIH). EIH, a social enterprise, donates 10% of every project to charity through recycling of end-of-life electronics. EIH monetizes recycled electronics to fund charities of their client’s choice. Last year, EIH donated \$40,000 to various groups focused on people impacted by Alzheimer’s and dementia. All donated goods are recycled securely, ethically, and efficiently according to federal, state, and local Environmental Protection Agency (EPA) regulations. EIH is a Microsoft Registered Refurbisher and is registered with The Florida Department of Environmental Protection. Computacenter (through Sturgeon) adheres to a zero-landfill policy and partner with certified disposal experts.

Home Office Relocation

In 2022, our home office is moving to a smaller, more efficient office space that promotes a hybrid work environment. Reducing the number of employees who drive to work is expected to have a positive impact on carbon emissions. The new facility will have motion sensors on all lights to reduce electricity consumption and a secure printing feature that will save paper.



Responsible Recycling

Wellpath works with best-in-class vendors to provide responsible waste disposal and recycling. Each year, our recycling partner Stericycle calculates and provides us with a summary of the environmental resources saved by our recycling efforts. According to the Stericycle 2021 report, we:

- Recycled 371,045 pounds of paper recycled
- Saved 557 cubic yards of landfill space
- Saved 3,171 trees
- Saved 70,499 gallons of oil
- Saved 1,298,658 gallons of water

Stericycle's Shred-It Recycling Process



Confidential documents are dropped into a secure, locked console.



On a scheduled basis, consoles are emptied and all confidential documents are destroyed.



A certificate of destruction is issued to each customer.



Shredded paper is transported to a paper mill for recycling.



Pulp is made as the fibers of the shredded paper are separated.



The pulp is put through a screening process that filters out impurities and prepares it for the removal of printing ink.



The newly recycled pulp is mixed with fresh pulp to manufacture new paper products.

Chapter 8

Performance



Performance

Data presented is for U.S. operations only and is as of 12/31 unless otherwise noted.

Purpose		
Activity Metrics	2020¹	2021
Total employees ²	14,204	14,265
Number of site service contracts ³	328	308
Number of facilities ³	468	567
Annual ADP ^{3,4}	243,316	242,791

People		
Team Member Diversity	2020¹	2021
Female Representation		
Percentage of female total workforce	77.3%	78.1%
Percentage of female mid-level managers ⁵	69.4%	67.4%
Percentage of female senior leaders ⁶	44.3%	44.7%
Ethnic Representation⁷		
Percentage of American Indian/Alaska Native	0.6%	0.6%
Percentage of Asian	4.5%	4.7%
Percentage of Black/African American	33.5%	34.0%
Percentage of Hispanic/Latino	9.8%	9.0%
Percentage of Native Hawaiian/Other Pacific Islander	0.4%	0.3%
Percentage of two or more races	2.8%	2.7%
Percentage of unknown/undeclared	0.1%	0.1%
Percentage of White	48.4%	48.5%
Percentage of non-White total workforce	51.6%	51.4%
Percentage of non-White mid-level managers ⁵	34.7%	36.0%
Percentage of non-White senior leaders ⁶	21.9%	23.3%

¹ Data for 2020 has been updated from the values reported in the 2020 report due to a historical records review and update of category definitions.

² Includes full-time, part-time and PRN employees | ³ Data includes Correct Care Australasia. | ⁴ Average of monthly ADP. Includes U.S. and international divisions.

⁵ Mid-level managers include supervisors, managers, directors, and team members that either have direct reports or oversee a functional department within the organization.

⁶ Senior leaders include vice-presidents, executives, and the c-suite. | ⁷ Non-white includes all ethnic categories except White and unknown/undeclared ("None").

People		
Team Member Diversity	2020	2021
Age Representation		
Percentage below 20	0.0%	0.1%
Percentage between 20-29	14.1%	12.8%
Percentage between 30-39	28.1%	27.2%
Percentage between 40-49	24.5%	24.6%
Percentage between 50-59	19.9%	21.3%
Percentage above 60	11.6%	12.4%
Percentage unknown	1.7%	1.6%
Retention/Turnover SASB Code: HC-DY-330a.1	2020	2021
Percentage of team members retained with tenure > 1 year	82.9%	77.8%
Percentage of voluntary turnover for medical doctors	15.7%	18.1%
Percentage of voluntary turnover for non-physician medical professionals	17.1%	30.4%
Percentage of voluntary turnover for all others	24.5%	27.7%
Percentage of involuntary turnover for medical doctors	2.9%	6.3%
Percentage of involuntary turnover for non-physician medical professionals	1.5%	6.6%
Percentage of involuntary turnover for all others	6.7%	5.6%
Safety Training¹	2020²	2021
Number of safety courses completed ³	44,122	53,397
Number of safety training hours ⁴	28,904	23,365

¹ Courses include the following topics OSHA-related topics: Active Shooter, Hazard Communications, Bloodborne Pathogens, Emergency and Disaster Preparedness, Security Awareness, Infection Prevention and Control, Injury and Illness Prevention, and Violence Prevention in Healthcare.

² The number of safety courses completed and corresponding number of safety training hours for 2020 have been updated from the values reported in the 2020 ESG Report due to a historical records review.

³ Number of courses completed by active employees during the reporting year. Training year is from March 1st through February 28th.

⁴ Number of hours for completed courses are per estimated completion time.

People

Health and Safety SASB Code: HC-DY-320a.1

(All Wellpath team members – see notes for context)

	Correctional Institutions ¹ (State Government)	Nursing and Residential Care Facilities ¹ (State Government)	2020	2021
TRIR ²	9.2	13.7	4.9	4.4
DART Rate ³	6.4	9.7	2.7	1.7
LTIR ⁴	6.0	8.5	1.9	1.0
Number and rate of fatalities because of work-related injury ⁵			0	0
Number of high-consequence work-related injuries (excluding fatalities) ⁶			0	0
Number of recordable work-related injuries ⁷			497	330
Percent of locations with no work injuries ⁸			66%	67%

¹ U.S. Bureau of Labor Statics, 2020 Benchmarks. The North American Industry Classification System (NAICS) codes presented are: 623 – Nursing and residential care services and 92214 – Correction institutions.

² Total recordable incident rate (TRIR) - The number of recordable incidents per 100 employees. Calculation = number of incidents x 200,000/total number of hours worked in a year.

³ Days away, restricted, or transferred (DART) rate - The number of recordable incidents per 100 employees that resulted in days away from work, days of restricted work activity, and/or days of job transfer. Calculation = number of incidents that resulted in days away, restricted or transferred x 200,000/total number of hours worked in a year.

⁴ Lost time incident rate (LTIR) - The number of recordable incidents per 100 employees that resulted in employee missing work. Calculation = number of incidents that resulted in missing work x 200,000/total number of hours worked in a year.

⁵ Number and rate of fatalities because of work-related injury - The number fatalities as a result of work-related injury. Calculation = number of fatalities x 200,000/total number of hours worked in a year.

⁶ High-consequence work-related injuries (excluding fatalities) - The number high-consequence events (non-fatal) because of work-related injury. Calculation = number of high-consequence work-related injuries x 200,000/total number of hours worked in a year.

⁷ Recordable work-related injuries - The number of recordable work-related injuries. Calculation = count of injuries.

⁸ % of locations with no work injuries - The percentage of locations with no work injuries. Calculation = the number of locations without work injuries/the total number of locations.

Patients		
Telehealth Interactions¹	2020	2021
Number of synchronous interactions ²	164,196	135,004
Number of Wellpath Now consults ³	276	2,587
Number of patients treated on-site	42	1,388
Number of other synchronous interactions	163,920	133,616
Number of asynchronous interactions ⁴	122,030	346,944
Number of online specialty referrals	121,143	297,166
Number of other asynchronous interactions	887	49,778
Total Interactions	286,226	482,148
Patients Saved with Narcan[®]	2020	2021
Number of patients saved with Narcan [®]	232	401

Partners		
Net Promoter Score[®]	2020⁵	2021⁶
Net Promoter Score [®]	71.54	49.90

¹ The number of synchronous interactions decreased from 2020 to 2021 along with pandemic-related national trends. More patients were seen remotely during 2020 when the workforce was working remotely, and less during 2021 when providers resumed more on-site care.

² Synchronous interactions are real-time telehealth interactions.

³ The Wellpath Now service was piloted through an outside vendor in 2020. It began internally in April 2021.

⁴ Asynchronous interactions for 2020 include e-consults and online specialty referrals. For 2021, asynchronous interactions include e-consults, online specialty referrals, teleradiology, tele-audiology, and tele-wound care.

⁵ Data for 2020 has been updated from the values reported in the 2020 report due to a historical records review and update of category definitions.

⁶ The decrease in net promoter score from 2020 to 2021 was primarily related to staffing challenges.

Process		
Privacy & Security	2020	2021
Number of data breaches - total	0	0
Percentage of data breaches involving PII	0.0%	0.0%
Number of customers impacted in data breaches involving PII	0	0
Percentage of data breaches involving PHI	0.0%	0.0%
Number of customers impacted in data breaches involving PHI	0	0
Governance		
Board of Managers Composition		
Percentage of women	22%	22%
Percentage of Black/African American	11%	11%
Percentage of Hispanic/Latino	11%	11%
Percentage of Asian	11%	11%
Percentage of independent individuals	33%	33%
Combined years of professional experience	252	261
Compliance		
Number of internal program audits completed	169	120
Number of compliance incident reports investigated and closed	60	105

Planet¹		
Pollution, Waste & Recycling	2020	2021
Number of electronic assets recycled	2,047	2,567
Pounds of paper recycled	436,910	371,045
Number of trees saved	3,734	3,171
Gallons of oil saved	83,013	70,499
Gallons of water saved	1,529,185	1,298,658

¹ With the exception of electronic assets recycled, data included in this table is calculated by Stericycle, a third party recycling contractor.

SASB Index

Topic	Accounting Metric	Code	Page Number(s)
Employee Health & Safety	(1) Total recordable incident rate (TRIR) and (2) days away, restricted, or transferred (DART) rate	HC-DY-320a.1	52, 78
Employee Recruitment, Development & Retention	(1) Voluntary and (2) involuntary turnover rate for: (a) physicians, (b) non-physician health care practitioners, and (c) all other employees	HC-DY-330a.1	45, 77
Employee Recruitment, Development & Retention	Description of talent recruitment and retention efforts for health care practitioners	HC-DY-330a.2	43-45
Patient Privacy & Electronic Health Records	Description of policies and practices to secure customers' protected health information (PHI) records and other personally identifiable information (PII)	HC-DY-230a.2	68-69
Patient Privacy & Electronic Health Records	(1) Number of data breaches, (2) percentage involving (a) personally identifiable information (PII) only and (b) protected health information (PHI), (3) number of customers affected in each category, (a) PII only and (b) PHI	HC-DY-230a.3	15, 68, 80
Patient Privacy & Electronic Health Records	Total amount of monetary losses because of legal proceedings associated with data security and privacy	HC-DY-230a.4	68