

expertise in action™



April 10, 2008

J. Clark Kelso, Receiver
Receiver's Strategic Plan
CA Prison Health Care Receivership Corp.
P.O. Box 4038
Sacramento, CA 95812-4038

Dear Clark,

ACS State Healthcare, LLC (ACS) is pleased to respond to the opportunity for public review and comment on "Achieving a Constitutional Level of Medical Care in California's Prisons -- The Federal Receiver's Draft Strategic Plan" dated March 11, 2008.

You clearly have a formidable challenge in front of you – making radical changes in a very short time period while planning for a long-term solution that is sustainable long after the courts complete their supervision.

This response to your Draft Strategic Plan does not recommend any specific changes to that plan. We believe that the fundamental approach that you are taking is well thought-out and achievable. The Vision and, more importantly, the Mission statement, clearly articulate what you need to accomplish.

The comments ACS respectfully submit in this document are meant to generate thought regarding the next step in your process -- implementation of solutions that will achieve your Goals and Objectives, resulting in fulfillment of your Mission. ACS is a company which has a passion for improving the healthcare delivery system through better information. Better information means smarter care - and smarter care means a more effective and more efficient health care system for CDCR.

The following comments are based on our current understanding of your next steps outlined in the Draft Strategic Plan. We would like to meet with you and your team, in person to gain a better understanding of your needs and ideas. After we better understand your preferred approach, we can provide more detailed information regarding tools and solutions which will help you achieve your goals.

ACS Government Solutions
300 Capitol Mall, Suite 1550 • Sacramento, California 95814
916.492.4264 • 916.497.0023 (fax)

Objective 2.1: Improve Chronic Care Beginning with Asthma

- We believe that pro-actively addressing chronic care will be the most effective means of reducing preventable deaths in the prisons
- A chronic care program should not only identify and treat patients with obvious chronic conditions, but should also use proven software analytics to identify patients most likely to develop chronic conditions and use appropriate care management to prevent/lessen the chronic conditions

Objective 2.2: Establish a Comprehensive, Safe and Efficient Pharmacy Program

- The key to success for such a program starts with the word “comprehensive”. A quality Pharmacy program can provide opportunities to control costs and improve quality of care. It is understood that a Quality Framework is built around four key elements, 1) Identification – Inmate-Patients are identified for risk levels and need for intervention; 2) Clinical Goals – These goals should guide the development of intervention strategies; 3) Intervention – Processes should be in place to ensure inmate/patients stay in programs; 4) Monitoring/Evaluation – Ongoing studies to measure effectiveness and to ensure continuous improvement.
- In addition to the 3 key elements identified within your Draft Strategic Plan, we would suggest real-time entry/review of all prescriptions to insure compliance with formulary and policy.

Objective 4.1: Establish Effective Clinical Support Services, Including Medical Records, Radiology Services, Laboratory Services, and Telemedicine

- The establishment of a central data repository is a good first step, but to be truly effective, it should be expanded quickly
- A central data repository is not nearly as effective as a true electronic health record system which transforms that data into useful information:
 - It should have seamless integration to facility based EMR systems – both for State operated and private facilities which treat inmate/patients, and it should be web-based to allow those small providers who can't justify an EMR to have direct input capability into the EHR.
 - It should have a comprehensive clinical rules engine that drives clinical alerts which is built upon clinically proven, sound criteria and expanded with CDCR criteria.
 - It should deliver real, actionable information to providers

- It must provide visibility into the patients information in a clear and concise manner – in a fashion that care giver's define.
- It must include all medical records, radiology, and laboratory services

General observations, not tied to specific Objectives

- We believe that you would be best served though the use of commercial off-the-shelf (COTS) products rather than custom built solutions, whenever possible. The nature of healthcare is changing rapidly and solutions which are regularly updated will be a better solution for California in the long run.
- The use of electronic document management systems (EDMS) would also benefit both the Receivership and CDCR in the long run. While the healthcare industry is moving toward standards that facilitate data to be entered into a database, some documents will never reach that level of standards. An EDMS would facilitate the electronic capture, storage, and sharing of non-standard information.
- A central claims payment system can facilitate timely, accurate payment to providers while insuring that claims are legitimate and appropriate. A claims payment system can also be a very cost effective method of gathering data from providers who do not share data electronically or through direct web-based data entry.

ACS hopes that these topics spark interest and generate some thoughts as to how innovation via information technology can help you achieve your Goals and Objectives, thus fulfilling your Mission.

If you have any questions regarding these comments, feel free to give me a call or call Roger Linnell, VP of ACS State Healthcare, at 425-503-7457. We look forward to further discussions.

Sincerely,



Bill Woodruff
Senior Vice President
ACS Government Solutions
916 835-6181

Cc: Jamie Mangrum, Chief Information Officer, CA Prison Health Care Receivership Corp.

ACS Government Solutions
300 Capitol Mall, Suite 1550 • Sacramento, California 95814
916.492.4264 • 916.497.0023 (fax)