

Clearpath Clinic

Medically Assisted Treatment & Recovery

A Program of the Center for Alcohol & Drug Treatment

The purpose of the Accessibility Plan is to promote accessibility and remove barriers. Clearpath Clinic addresses accessibility concerns to enhance the quality of life for those served by the Clinic; implement nondiscriminatory employment practices and meet legal and regulatory requirements; and meet the expectations of stakeholders in the area of accessibility. This report and improvement plan is meant to enhance access to programs, services, facilities, and the community.

Assessment and Practices

In order to assess accessibility, Clearpath Clinic examined its identification of barriers in the following areas:

- Architecture (physical)
- Environment
- Attitudes
- Finances
- Employment
- Communication
- Technology
- Transportation
- Community Integration

Any identified barriers to service are addressed through one of the following internal committees:

- Quality Improvement Committee
- Safety Committee

ARCHITECTURAL BARRIERS

Architectural barriers are physical features that limit or prevent people with disabilities from obtaining the goods or services that are offered. Clearpath Clinic is located at 1402 E. Superior Street in Duluth, MN, and was built in compliance with the Americans with Disabilities Act (ADA). Patients park in the parking lot on Superior Street where there is a direct entry/accessible entrance to the building. The clinic is located in the lower level of the 1402 building, and is accessible by either stairs or an elevator for patients with mobility challenges. In addition to the elevator, there is a same-level entrance at the back of the clinic on Jefferson Street that can be an option for patients with more significant mobility challenges, or for patients

with other issues requiring them to separate from other patients (such as during the COVID-19 pandemic). There is an accessible window that is wheel chair level at both the front desk/check-in area, as well as at dosing window #5 so that patients who need to remain in their wheel chairs can comfortably check in and receive their medication from the nurse.

Architectural barriers are identified through the incident reporting process and/or through inspections conducted by the Safety Committee representative. Alterations and improvements are made in response to identified areas of concern as they arise. The stairway can become slippery and dirty during winter months due to sand, salt and snow being tracked in on patients' shoes and boots. The stairway is therefore monitored more closely during winter months and cleaned multiple times daily as needed or if reported by staff or patients to be in need of upkeep. When areas are wet or dirty, safety signs/cones are posted in the area until it can be properly cleared/cleaned. Anti-slip grip strips are secured to each step to prevent slippage. There are rugs in both the stairway and the lobby to help reduce the wetness that gets tracked in during snow events. Fans are mounted to the stairway area and floor fans are used on days where more snow and dirt are tracked in. Security guards monitor the stairway area as well and clean up as needed.

The physical number of patients coming in and out of the clinic each day can present architectural (and in some cases, environmental), barriers as well. Having large numbers of patients in the clinic at the same time can increase safety concerns. In 2021, the census at Clearpath Clinic increased from 425 on January 1st, 2021 to 551 on December 31st, 2021. This increase is partially attributed to increased efforts at community outreach and screenings in response to the impact of COVID19 and resulting increase in overdoses and overdose deaths in the St. Louis County area. There has been more need for OTP's to provide Medication Assisted Treatment Services as well as to provide emergency specials under SAMHSA's blanket variance. In response, the number of patients receiving and/or requiring specials take home doses of medication increased dramatically during the pandemic (which then reduced the number of patients coming in and out of the clinic). Clearpath Clinic LPN's have been trained in the pre-pour method to accommodate these special circumstances, which also reduces wait times for patients.

In 2021, Clearpath Clinic continued to use all 5 dosing stations, which also helped to decrease dosing times. Clearpath makes referrals to CADT's OBOT program, as well as works with area waived medical providers so patients can be prescribed Suboxone outside of the OTP clinic setting - this allows for patients to access Suboxone without all the restrictions and requirements of an OTP. Clearpath was able to reduce the number of Suboxone patients from 23 patients on January 1st, 2020, down to 1 patient by the end of 2021.

ENVIRONMENTAL BARRIERS

Environmental barriers can be interpreted as any location or characteristic of the setting that compromises, hinders, or impedes service delivery and the benefits to be gained. Some service sites may be located in areas where the person served and/or personnel do not feel safe or feel that confidentiality may be at risk. Internal barriers may include noise level, lack of soundproof counseling rooms, and highly trafficked areas used for service delivery. The Treatment Director will monitor and address these barriers throughout the year.

Clearpath Clinic is located in an area of the city that is accessible to the patients via a variety of transportation modes including busing, walking, and medical rides. The Clinic is located in the same building as CADT's Withdrawal Management Unit, which makes it an area in the community already familiar to many of the patients. Clearpath Clinic is located on the bus line. There is a small parking lot available for patients in the upper lot of the building, as well as a staff parking lot behind the building. There is additional parking for both staff and patients on Superior Street and on 14th Avenue, just to the side of the 1402 building. A parking space is left open by the back-door entrance to the Clinic for patients with disabilities in need of quick and comfortable access to services. The security guard escorts patients entering through the back-door entrance.

Patient confidentiality is a priority at Clearpath Clinic. There are separate offices in the reception area for intakes, MNsure applications, or any other paperwork needing to be completed with patients with privacy. There is a locked medical records office for the Clinic, however most information is stored via secure electronic medical records in Methasoft or Procentive. If a patient needs to use the elevator to access the Clinic, he/she will access that elevator in the lobby area that serves the Withdrawal Management Program, which is one floor above the Clinic. The reception area is secure, under video surveillance, and staffed at all times. In addition, patients may also use group rooms in the Clinic to meet with intake staff or counselors for an accessible and confidential space that also allows for required social distancing due to COVID19.

Most counselors have a private office. There are three shared counselor offices, and counselors ensure and arrange for confidentiality of patients by scheduling alternating patient appointments, or utilizing the group room for their counseling sessions. Due to limited space and increasing patient population, the Clinic will continue to evaluate and make adjustments to the space as needed throughout 2022, and further evaluate what an effective patient capacity level is, given space and staffing limitations.

ATTITUDINAL BARRIERS

Attitudinal barriers may include the terminology and language that the Clinic uses in its literature or when communicating with patients, other stakeholders, and the public; how patients are viewed and treated by the Clinic, their families and the community; whether or not patient input is solicited and used; and whether or not the eligibility criteria of the Clinic screens out specific individuals or groups of people.

All promotional material and/or policies and procedures are reviewed on an ongoing basis by management staff to ensure that bias or potentially offensive language is not present.

Additionally, management staff are involved in community initiatives and help to educate professionals and community members.

Mandatory annual training is provided to all staff members that addresses sensitivity to cultural differences. Medication Assisted Treatment trainings that provide an emphasis on stigma and working towards reducing stereotypes will continue to be offered during 2022. The Director of Community Relations facilitates a monthly community opioid response group which will continue throughout 2022. In 2021, the Treatment Director, Clinical Pharmacist and/or Medical Provider

continued to attend collaborative meetings with the Justice Involved/MAT Recovery Group; the Duluth Area Inter-organizational Collaborative Group; the Clarity Project and MAT subgroup; the Safe Babies 0-3 Specialty Court; the Twin Ports SUD Collaborative Group; and other pop up community meetings related to Opioid Use Disorder or Medication Assisted Treatment. The general purpose for most of the workgroups is to collaborate in order to improve continuity of care for patients with Opioid Use Disorder, educate the community about medications for Opioid Use Disorder (MOUD), and advocate for change that improves care. The CEO also sits on the system-wide Opioid Oversight Committee to work on implementing a consistent policy for primary care physicians which include access to Suboxone. The CEO is on the MARRCH Boards of Governors (Region 2), and Co-chair of the Government Affairs Committee, and attends monthly public policy meetings along with the Compliance Officer and Clinic Treatment Director. The CEO, Director of Community Relations, and Compliance Officer attend quarterly CSSUR Meetings (Community Solutions for Substance Use and Recovery). Clearpath Clinic is proposed as the hub in a hub-and-spoke model to provide primary care physicians with consultation and problem-solving with their patients.

In addition, CADT/Clearpath is involved in collaborative grants with St. Louis County through SAMHSA. This proposal helped to fund programs to expand MAT services within the community. In all these community groups and initiatives, the theme of reducing stigma for the patients at the clinic is evident and valued.

Clearpath Clinic's training team includes the Medical Provider, Treatment Director, Clinical Pharmacist and Clinical Supervisor. This team has increased community trainings over the course of 2021, despite the COVID-19 pandemic. Providing training on MAT and MOUD to various counties, local high schools and the Minnesota Department of Health and Human Services Conference in October of 2021 were just a sample of the outreach and trainings done by clinic staff in 2021. All trainings place an emphasis on combatting stigma and improving attitudinal barriers in the area of Medication Assisted Treatment. The plan is to continue trainings, education and outreach for 2022 as an effective means of combatting attitudinal barriers.

Clearpath Clinic conducts patient satisfaction surveys with each patient upon admission and every 6 months following admission to the program. Responses to the survey are reviewed by the Quality Improvement Committee on a quarterly basis. Goals and data regarding the Patient Satisfaction Surveys are included in the performance improvement plan. Clearpath's goal remains to maintain a 90% favorable level of patient satisfaction and complaint resolution.

FINANCIAL BARRIERS

Clearpath has a goal to reach and maintain a "break even" point financially in 2021. This requires retaining qualified staff in all job roles which has been very challenging during the past 5 years. CADT has increased provider wages as a means to recruit and maintain staff. CADT is also providing increased staff trainings and has improved the culture to reduce staff turnover and reduce the associated financial costs.

Clearpath Clinic is funded through a per diem rate established by the state of Minnesota and adopted by most health plans for both state sponsored (Medicaid) and commercial products. This rate has been below our "break even" cost at the original design capacity (525 patients). CADT has utilized margins generated by the other programs and services it offers to maintain the operation of the Clinic, while simultaneously working to recruit staff. Demand for services continues to exceed the

design capacity, so the market can support this expansion. The clinic has been able to increase the capacity & has been out of the red for most of 2021.

A proposal by the Minnesota Department of Human Services would “unbundle” the per diem rate to allow for separate billing of psychosocial counseling services, depending on the individual level of care. This has been under consideration at the state level in 2019 and 2020. Due to impacts of COVID19 this remains unchanged in 2021.

We continue to see issues related to the pandemic with no improvements to staffing shortages. Although the pandemic continues to be an issue there weren't any additional grants CADT could apply for in 2021.

Clearpath Clinic seeks to reduce and/or eliminate financial constraints that may restrict the ability of all eligible patients to access any services consistent with their needs and preferences.

Intake staff works closely with financial staff to determine a patient's funding source prior to the start of treatment. Additionally, intake staff works with potential patients offering possible alternative solutions to explore when a patient is having difficulty obtaining funding for treatment.

EMPLOYMENT BARRIERS

Clearpath Clinic recognizes that the Americans with Disabilities Act (ADA) and its policies prohibit discrimination in all employment practices, including job application procedures, hiring, firing, advancement, compensation, training, and other terms, conditions and privileges of employment. It applies to recruitment, advertising, tenure, layoff, leave, fringe benefits, and all other employment-related activities. The Management Team reviews policies at least annually and updates policies as needed. COVID19 created employment barriers in 2020 and 2021, such as difficulty recruiting due to fears of the virus, unemployment compensation availability for workers who normally would be potential hires, or staff having to take leave to recover from the virus.

The employee's direct supervisor may accommodate a request from an employee for reasonable accommodations to address any disability issues the employee may have. All requests for reasonable accommodations are handled on a case-by-case basis.

All open positions are posted at each CADT facility and on several websites on the Internet, including online employment websites. It is difficult to hire and retain nurses due to other employment options in the community. CADT contracted with Integrity Staffing Solutions in 2020 to assist us in the recruitment of qualified LPNs. There is also a lack of qualified providers in the area. We have increased our sign on bonus for Provider positions and added the benefit of a paid membership through NAADAC which provides a resource for Providers to get their required CEUs. CADT has opened paid internship positions in the effort to help maintain staffing levels and recruit new staff; however, DHS places limitations on interns in an OTP.

CADT leadership regularly evaluates staffing patterns and adjusts our staffing resources in order to ensure high quality service provision. The pandemic added challenges to maintaining full staffing. To address this challenge, CADT adjusted its onboarding procedures to expedite the process while continuing to provide comprehensive training for new hires. CADT used weekly COVID preparedness meetings to anticipate and respond to staffing issues that arose.

In 2022, Clearpath Clinic will continue to explore additional recruiting options as the clinic capacity expands and plans to be fully staffed throughout 2022.

COMMUNICATION BARRIERS

Communication barriers include the absence of telecommunication devices for the deaf (TDD) and the absence of materials in a language or format that is understood by the patient. Clearpath Clinic currently does not have a TDD. ASL interpreters are available through subcontract. Clearpath Clinic offers an accessible, user-friendly website that makes it possible to share information about the agency and its programs and services.

Arrangements for foreign language translators are made on an as needed basis.

Any patient that displays learning disabilities will be further evaluated and accommodations will be made to meet the needs of the patient on a case-by-case basis, as need arises.

Staff communication is facilitated through regular meetings, email and in person. A staff meeting schedule is in place and minutes are kept for each meeting and shared with all staff. Additionally, there is a monthly required reading program to better help educate staff on policies and procedures. Executive and clinic management meetings are held regularly and increased

when needed to help clarify policies and procedures as well as to develop better communication between disciplines and improve teamwork.

TECHNOLOGY BARRIERS

Technology barriers include the evolving technology, the upkeep of equipment, assistive technology, and issues more specific to the populations served. CADT/Clearpath has implemented monthly meetings with the agency subcontracted for IT services, CW Technology, in an effort to address any technology barriers as quickly as possible. An IT staff member from CW technology is on site at one of the CADT programs every other week to address any technology issues in person. In addition, CW Technology IT remote support and Methasoft remote support are available to all staff by phone.

Regulatory agencies allowed telehealth services to be added to the treatment milieu during 2020 and 2021 to accommodate patients during the COVID19 pandemic. In some cases, this has proven to be a helpful and accessible treatment format alternative. Regulatory agencies are making efforts to permanently add telehealth services in the Substance Use Treatment arena after COVID19 is under control.

TRANSPORTATION BARRIERS

Transportation barriers include persons being unable to reach service locations or being able to participate in the full range of services, supports, or activities offered. Clearpath Clinic staff attempts to promote natural supports in meeting transportation needs. The Clinic maintains vehicles that are shared with CADT. Counselors work with patients on solutions for transportation barriers. In cases where solutions for transportation may be limited, patients may request to see if transportation is able to be arranged through Clearpath, as there is a "driver/transport" staff who is employed through the Center for Alcohol and Drug Treatment and works out of the Withdrawal Management Program, who may be available for assistance in emergency situations. The Clinic is located on an established bus line and there are multiple buses running throughout the day to the 1402 building.

COMMUNITY INTEGRATION BARRIERS

Barriers to community integration include any barrier that would keep the person served from returning to full participation in their community job site. Clearpath clinic is the only clinic within a 100 mile plus radius, which can create community integration barriers for patients that need to spend time traveling to obtain their dose and other clinic services. Patients who live farther away from the clinic that have limited or no takeout privileges may have problems obtaining and retaining employment. Clearpath staff works closely with patients to help reduce this barrier by phasing patients up as soon as clinically appropriate in order to support independence from the clinic, free them up to work, and participate in other sober activities. Clearpath also designates a "work card hour" each weekday morning for those who are students or employed, so they can get in and out quickly, and on their way to work or school.

OTHER BARRIERS AS IDENTIFIED BY PATIENTS, PERSONNEL OR STAKEHOLDERS

Previously, patients that have been incarcerated in the local county jails or NERCC have had no access to the medications that they were prescribed through the clinic. This put patients at a high risk for relapse, and potential overdose upon release from incarceration. During 2021, Clearpath made great strides in collaborating with St. Louis County Jail, Carlton County Jail, and NERCC in figuring out ways to get medication and counseling services to active Clearpath patients who became incarcerated. With the challenges brought about by the COVID-19 pandemic, SAMHSA and MN DHS relaxed guidelines surrounding requirements for take home medications, allowing easier access to necessary medications, as well as allowing for telehealth

appointments so that patients can remain compliant with mandatory individual counseling sessions. This opened the door for this type of care coordination and allowed for active patients to continue to receive services for the first time.

CADT is working to develop a “Rapid Access, Barrier Free, No Wrong Door” model of care for its Addiction Medicine Clinic that allows patients immediate access to medication, problem-solves barriers, and gets patients MAT medication within 12 hours or less of first contact. During the 3rd quarter of 2021, the Withdrawal Management unit was expanded to 40 beds to accommodate this goal, and Clearpath Clinic completed several “walk-in” admissions for the first time.

Patient Input

Patient satisfaction surveys are given to patients to fill out at time of intake and again at 6-month intervals of their treatment. Patients consistently complete the surveys and will often provide comments and feedback. The survey results are reviewed on a quarterly basis and patient comments and feedback are addressed. The Treatment Director sends out post discharge surveys to discharged patients on a quarterly basis. The survey results are reviewed with the Quality Improvement Committee and patient comments and feedback are addressed.

Patients are informed on the day of intake about the process of filing complaints/grievances. All documented complaints/grievances will be handled and resolved as expediently and efficiently as possible with the goal being patient satisfaction with the resolution, as well as to correct any possible issues in accordance with Clearpath Clinic’s Grievance Policy (112). Any trends are noted, reviewed by the Quality Improvement Committee, and steps are taken to rectify any problems. Material is also available for patients to submit confidential comments.

A Patient Advisory group meeting is offered monthly. This group offers opportunity for patients to share their concerns and ideas with staff. Feedback from patients will be provided to the Quality Improvement Committee and to Clearpath staff to address the legitimate concerns of patients. Clearpath will continue to work on solutions to encourage patients to sign up, attend and actively participate in this group during 2022.

Reasonable Accommodation

Clearpath Clinic subcontracts with agencies and/or individuals to provide necessary specialized services for persons who cannot be accommodated at internal facilities (i.e. dually diagnosed patients – mental illness & developmental disability; patients who need specialty services such as treatment for sexual problems or eating disorders; deaf adults; and those in need of psychiatric services).

Leadership and Responsibilities

The Executive Team and Clearpath Clinic management staff will be the entity responsible for the review of the Accessibility Plan. The Treatment Director will be in charge of the oversight of the Accessibility Plan and task management. The status of the plan will be reviewed annually. The Executive Team is responsible for prioritizing and reviewing the accessibility plan as well as the requests for reasonable accommodations. The Executive Team will evaluate and carefully consider the merits of all requests for accommodation to determine whether any remedial actions are appropriate. All requests will be identified, reviewed, decided upon, and documented. When an agreement has been reached to provide the accommodation, the steps to accommodation may be part of the person’s plan. When an accommodation cannot be made,

Clearpath Clinic will demonstrate a referral system that assists the person served, personnel or other stakeholders in the use of other resources that are accessible. Processes can be different for requests from persons served versus those made by staff personnel.

Communication of the Accessibility Plan

Clearpath Clinic will create an annual Performance Analysis report. This report will include progress made in the removal of identified barriers and areas needing improvement. Copies of the Accessibility Plan will be made available upon request to patients, employees, stakeholders, and the public. Alternative formats will be available upon request. The Accessibility Plan will be posted to the Clearpath Clinic website and the plan will be reviewed with staff and copies provided to patients and stakeholders via posting in the Clinic and website by February 2022.

Summary

Clearpath Clinic is active in its attempts to ensure that barriers to service are either nonexistent or minimal through continued self-inspection of facilities, monitoring of annual work plans, and attention to complaints, potential or real barriers can be identified and avoided or mitigated. All barriers noted above are evaluated throughout the year and barriers are responded to as they arise. This plan will be reviewed by the Executive Team in January 2022, and will be updated at that time.

Reviewed & Revised

January 2022