



## **Concentra's Proposal for Medical Services/Physicals for Firefighters, Pre-employment, DOT/Public Works**

PRESENTED TO

**Capital Region Council of  
Governments**

PRESENTED BY

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April 26, 2023

Capital Region Council of Governments  
241 Main Street, 4th Floor  
Hartford, CT 06106

RE: Medical Services/Physicals for Firefighters, Pre-employment, DOT/Public Works, 2023-03-29 RFQ

Concentra® is pleased to present to Capital Region Council of Governments (CRCOG) our proposal to provide Medical Services/Physicals for Firefighters, Pre-employment, DOT/Public Works, which adheres to all specifications and includes all relevant attachments.

Our national footprint, strong infrastructure, health care expertise, and commitment to service excellence would provide tangible benefits for CRCOG – supporting you in your efforts to meet your program objectives. Concentra draws from a pool of experienced professionals to serve our clients' needs. We assign an initial point of contact during the procurement and contracting phases and designate operational resources to provide ongoing account management and program support. The operations director would monitor contract deliverables and program expectations to help ensure we achieve successful outcomes that effectively meet the program objectives. In addition, the account management team would help ensure the services rendered under the contract remain compliant with all applicable local, state, and federal regulations.

Should you have any questions or concerns regarding our response, please contact [Justin Timpano](mailto:justin_timpano@concentra.com), *Director of Sales*, via phone: 860.303.6174 or by email: justin\_timpano@concentra.com.

Concentra affirms that:

- All information contained herein is current, complete, accurate, and remains valid for 120 days following the due date, April 26, 2023
- We are in receipt of Addendum One and Two.

Concentra values CRCOG's consideration of our response. We are confident that after you review our experience, capabilities, geographic footprint, and account management strategy, Concentra will emerge as your ideal partner for the requested services. We look forward to the opportunity to serve as the preferred Medical Services/Physicals for Firefighters, Pre-employment, DOT/Public Works partner with Capital Region Council of Governments and its employees.

Respectfully submitted,

DocuSigned by:

Handwritten signature of Robert G. Hassett, DO, MPH in black ink.

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Robert G. Hassett, DO, MPH

President, Treasurer and Corporate Secretary

Occupational Health Centers of the Southwest, P.A. dba Concentra Medical Centers

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## 1. Executive Summary

CRCOG has unique service specifications and Concentra can deliver customized clinical solutions to help you achieve your program goals and objectives. We treat one in every five work-related injuries/illnesses, more than 18 million since 1979. We maintain policies and procedures to ensure ongoing compliance with standard regulating bodies, including the Occupational Safety and Health Administration (OSHA), the U.S. Department of Transportation (DOT), the Americans with Disabilities Act (ADA), the Family and Medical Leave Act (FMLA), the National Fire Protection Association (NFPA), police officer standards, and many others. Our approach successfully combines evidence-based medicine with our clinical expertise and superior service discipline to deliver convenient access to quality care and measurable cost savings.

### A Best-in-Class Occupational Health Model

With a clear and compelling vision and a notable record of accomplishments, we offer our best-in-class solution and a health care experience that is second to none. As clients come to know us, they discover Concentra's value in everything we do.

### Clinical Foundation

Concentra was founded by physicians as a medical practice and the delivery of high-quality medical care continues to be our core competency to this day. We hire and retain some of the finest clinicians in the industry and have established a model for workplace health unequalled in the industry. Concentra's Medical Expert Panels work to identify health trends, research new treatment approaches, monitor regulatory changes and develop clinical practice guidelines and best practices.

Examples include, but are not limited to:

- Developed the FReSH program (Functional Restoration/Status of Healing Scale), a new approach to pain management, which focuses on functional movement and improvements in the healing process. This program encourages patients to take a more active role in their recovery which means injured employees return to work faster, making your company more productive.

Developed a Sleep Evaluation Worksheet (SEW) used by our clinicians to evaluate individuals in safety sensitive positions for the presence of sleep disorders that may pose a hazard to themselves and their workplace. This was created due to the lack of guidelines in the FMCSA's Medical Examiner Handbook and to provide consistency and direction for our medical examiners. The SEW incorporates recommendations from the FMCSA's Medical Expert Panel and the Medical Review Board. Concentra has also built the clinical infrastructure to keep us at the forefront in workplace health and our Enterprise Quality Improvement Program Committee monitors key quality measures and oversees improvement initiatives.

### Expertise and Innovation

Concentra played a significant role in creating the workplace health industry model that exists today. We apply our proven methodologies to occupational medicine and workers' compensation and have developed evidence-based clinical guidelines to help improve treatment and overall outcomes. We established the Concentra Occupational Health Research Institute (COHRI) in 2000 to promote scientific research and continuing medical education in occupational health.

## A National Leader Applying Proven Approaches



**More than  
18 million**  
occupational  
injuries treated  
since 1979



**One in  
every five**  
workplace  
injuries in the  
United States  
are treated at  
Concentra



**Approx.  
800,000 injuries**  
treated in our  
centers in 2019



**Over  
600,000 cases**  
seen by  
Concentra  
Advanced  
Specialists  
(CAS)



**50,000  
patients**  
seen at  
Concentra  
onsite clinics  
and medical  
centers each  
day

## Unmatched Access

With Concentra, your employees have access to our extensive network of more than 520 Concentra medical centers nationwide. In addition, Concentra Telemed<sup>®</sup> and Concentra Telerehab<sup>®</sup> extend access to care beyond the centers' walls and standard working hours. Our integrated approach ensures continuity of care by leveraging the same electronic medical record and practice model regardless of access point.

Concentra's Transportation Solution provides injured employees with scheduled and real-time rides to and from Concentra medical centers. Available nationwide, our transportation solution is provided free of cost for employee transportation after initial injury, for follow-up appointments, and for scheduled physical therapy visits. After an employee reports an injury to his/her supervisor, the supervisor calls the local Concentra medical center to request a ride. A few minutes later, a driver sends a text message notifying the employee of the estimated time of arrival for pickup. After the visit, center team members arrange for the employee's ride back to the workplace or home, depending on the severity of the injury and the treating clinician's recommended treatment plan. CRCOG's employees would have prompt access to expert care, convenient rides with no smartphone app or tip required, and reduced time away from work.

## Our Mission

Our company mission is to improve the health of America's workforce, one patient at a time. We take a customized approach that enables us to meet the diverse needs of our customers across the U.S. We attribute our success to our commitment to put our customers' people first, delivering personalized attention that optimizes employee health and productivity.

## 2. Understanding CRCOG's Requirements

Concentra understands that CRCOG is seeking responses from qualified and experienced physicians or health care organizations to perform firefighter (both volunteer and paid), public works employees, and pre-employment physicals in accordance with National Fire Protection Association (NFPA) Standards 1582 and 1500, Occupational Safety and Health Administration (OSHA) requirements 1910.120, 1910.134 and 1910.156, general firefighter health considerations, and any local, state or federal regulations regarding the same.

Concentra further acknowledges that CRCOG desires occupational health services consisting of a minimum of the following:

- General Pre-Employment Medical Examinations (Non- Public Safety)
- Pre-Employment and Annual/Biennial Physicals for Public Safety (Fire Personnel)
- Fitness for Duty/Disability/Independent Medical Evaluations
- Drug and Alcohol Testing

### Concentra's Solution

Concentra has extensive experience performing the requested services and we are confident our expertise and best practices approach to occupational health services make us the right company to assist CRCOG in meeting its program objectives.

[Concentra's longevity in health care and our experience serving clients like CRCOG would prove valuable during our engagement.]

Concentra would successfully perform the requested scope of services proficiently and in the most cost-effective manner through our extensive network of medical centers, our skilled clinicians and account management team staff, and our operational efficiency.

Concentra assures CRCOG that we would:

- Leverage our decades of experience and use company best practices that are compliant with the Department of Transportation (DOT), Occupational Safety and Health Administration (OSHA), and other regulated examinations
- Maintain policies and procedures to ensure ongoing compliance with the Americans with Disabilities Act (ADA), the Family and Medical Leave Act (FMLA), the National Fire Protection Association (NFPA), police officer standards, and many others
- Conduct drug screenings in accordance with DOT standard, 49 CFR Part 40
- Utilize a Substance Abuse and Mental Health Services Administration (SAMHSA)-certified, College of American Pathologists-Forensic Drug Testing (CAP-FDT) accredited, and Clinical Laboratory Improvement Amendments (CLIA)-certified laboratory for specimen analysis
- Utilize our **East Hartford** medical center as the main service site
- Employ only properly certified and trained staff to perform the scope of work
- Assign a designated team of qualified professionals to oversee CRCOG's program and ensure continued compliance
- Document patient visits and generate meaningful reports
- Maintain records securely to ensure confidentiality of personal health information in accordance with the guidelines outlined by the Health Insurance Portability and Accountability Act (HIPAA)

*We have the experience and resources, and qualified personnel, and are readily able to serve CRCOG efficiently and professionally.*



### 3. Approach to Performing the Scope of Work

In the following pages, we provide service descriptions for providing CRCOG's requested scope of work. While these service descriptions highlight our standard approach, we have the expertise and resource to render all services per CRCOG's specifications and in full compliance with all applicable regulatory requirements.

#### Facility Overview

Concentra medical centers offer a full complement of health care services including, but not limited to, substance abuse testing, physical examinations, clinical services, vaccinations, injury care, physical therapy, and wellness screenings. Our centers offer convenient weekday operational hours and many locations also offer evening and weekend hours.

We continually evaluate the layout of our centers to accommodate patient flow and volume. Therefore, the physical dimensions, layout, and staffing of each center vary depending on the location and overall scope of services. Our centers average between 3,100 and 9,000 square feet in size. The centers maintain security services, and most offer free parking on the center property or adjacent to the center. All facilities are accessible (ADA-compliant) and conform to all applicable federal, state, and local safety and disability laws.

As described in the following table, each center's layout consists of support/common areas and clinical areas.

Support/Common Areas		
<ul style="list-style-type: none"> <li>Waiting room – seating for patients with a television and magazine/coffee bar</li> <li>Business office – work area for clerical staff</li> </ul>	<ul style="list-style-type: none"> <li>Manager office</li> <li>Break room</li> <li>Marketing office</li> </ul>	<ul style="list-style-type: none"> <li>Restroom</li> <li>Records storage area</li> <li>Telephone/electrical area</li> </ul>
Clinical Areas		
<ul style="list-style-type: none"> <li>Procedure rooms (for minor procedures)</li> <li>Examination rooms</li> <li>Lab area – separate restrooms (ADA-compliant) for drug and alcohol collections</li> <li>Breath analysis/exam room – to maximize privacy for federally mandated testing</li> </ul>	<ul style="list-style-type: none"> <li>Audio testing room – a single-person booth</li> <li>Physician office</li> <li>Physician station – with X-ray viewing areas and privacy to enter patient data into computer system</li> <li>X-ray facilities – a full-service X-ray room and digital file storage</li> </ul>	<ul style="list-style-type: none"> <li>Storage area – for patient charts</li> <li>Physical therapy area with whirlpool, treatment areas, strength and flexibility equipment, hydrocollator/freezer, and a wide variety of therapy modalities</li> </ul>

#### Service Sites

Concentra proposes that our center closest to CRCOG, the **East Hartford** center, serve as the primary site for your employees. The East Hartford medical center maintains the essential staffing resources, required equipment, and licensed and credentialed clinicians to perform your requested scope of services. While the East Hartford center is fully capable of providing all required services in one facility, all Concentra medical centers are available to CRCOG as convenience necessitates. *Please note that medical center hours are subject to change and some select services may vary from center to center.*

## Concentra Medical Centers CROG area



## Connecticut Locations

**1. East Hartford**

701 Main St  
E Hartford, CT 06108  
Mon-Fri: 7 am - 5 pm  
Ph: 860.289.5561  
Fx: 860.291.1895

**2. New Britain**

972A W Main St  
New Britain, CT 06053  
Mon-Fri: 8 am - 5 pm  
Ph: 860.827.0745  
Fx: 860.827.0824

**3. New Haven**

370 James St, Ste 304  
New Haven, CT 06513  
Mon-Fri: 8 am - 5 pm  
Ph: 203.503.0482  
Fx: 203.503.0492

**4. Norwich**

315 W Main St  
Norwich, CT 06360  
Mon-Fri: 8 am - 5 pm  
Ph: 860.859.5100  
Fx: 860.859.5110

**5. Stamford**

15 Commerce Rd, 3rd Floor  
Stamford, CT 06902  
Mon-Fri: 8 am - 5 pm  
Ph: 203.324.9100  
Fx: 203.324.9400

**6. Stratford**

60 Watson Blvd  
Stratford, CT 06615  
Mon-Fri: 8 am - 5 pm  
Ph: 203.380.5945  
Fx: 203.380.5953

**7. Torrington**

333 Kennedy Dr, Ste 202  
Torrington, CT 06790  
Mon-Fri: 8 am - 5 pm  
Ph: 860.482.4552  
Fx: 860.496.1033

**8. Wallingford**

900 Northrop Rd  
Wallingford, CT 06492  
Mon-Fri: 8 am - 5 pm  
Ph: 203.949.1534  
Fx: 203.949.9036

**9. Waterbury**

8 S Commons Rd  
Waterbury, CT 06704  
Mon-Fri: 7 am - 5 pm  
Ph: 203.759.1229  
Fx: 203.759.0219

**10. Windsor**

1080 Day Hill Rd, Ste 2  
Windsor, CT 06095  
Mon-Fri: 8 am - 5 pm  
Ph: 860.298.8442  
Fx: 860.298.9420

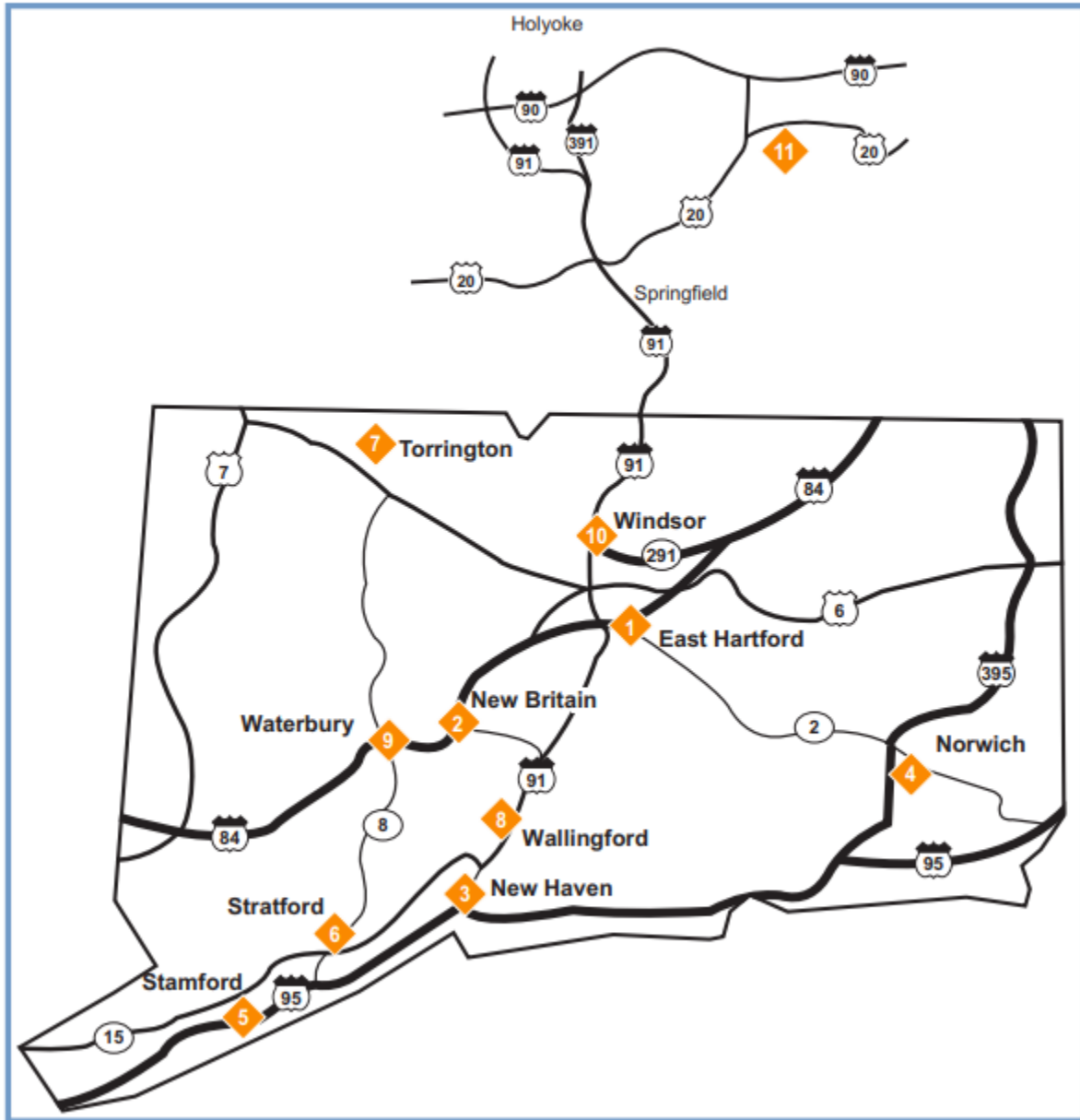
**11. Springfield**

140 Carando Dr  
Springfield, MA 01104  
Mon-Fri: 8 am - 5 pm  
Ph: 413.746.4006  
Fx: 413.746.3230





## Connecticut Locations



## Multilingual Support

Through our nationwide network of Concentra Medical Centers and employer onsite clinics, Concentra has acquired extensive experience with multilingual populations. To accommodate multiple language requirements, we use remote translation services through our preferred provider, Voiance. This 24/7 service supports more than 200 languages and dialects, including American Sign Language. Also, many Concentra centers are staffed with clinician's and office staff who are bilingual, and recruiting bilingual staff is another option, where a specific engagement requires.

In addition, our marketing department can translate promotional material and center messaging into other languages. Additional fees may apply for translation services.

## Occupational Health Services

### Physical Examinations

Concentra has comprehensive policies and procedures outlining examination requirements in accordance with DOT, OSHA, ADA, and general occupational health. We assure CRCOG that a trained and appropriately licensed medical professional would perform the required examinations and adhere to all applicable regulations and guidelines specific to the examination.

### Medical and Work History Questionnaire

Prior to any physical examination, an employee completes a thorough medical history questionnaire that includes personal, occupational, family, and medication history. Our comprehensive medical and work history questionnaires ensure your employees are compliant with all federal, state, and local mandates specific to their job category.

After reviewing the questionnaire, Concentra's clinician performs a comprehensive physical examination and reviews the questionnaire in conjunction with the employee's test results to make the appropriate medical recommendations. Concentra immediately addresses any findings that pose immediate danger to the life or health of the employee.

### FormFox Electronic Forms

Concentra uses the FormFox system to electronically capture the employee's medical history and questionnaire. The employee completes the form online before coming to the clinic/medical center, or upon arrival, thus ensuring legibility and completeness (the system prevents skipping sections). For DOT physicals, if the driver is certified, the medical examiner's certificate (MEC) is provided in the center post-visit. All determinations are reported to the National Registry of Certified Medical Examiners (NRCME) per regulations.

### Custom and Spanish Forms

Concentra has custom medical and work history questionnaires in both English and Spanish and can provide an array of comprehensive and mandated questionnaires necessary to maintain compliance.

## Types of Physical Examinations

### Standard Examination Components

Concentra would provide physical examinations according to CRCOG's requirements. However, it is customary for the standard examination to include the following components:

- Medical history
- Occupational history
- Vital signs
- Vision acuity (far distance)
- Examination of head, eyes, ears, nose, and throat
- Evaluation of the cardiovascular system
- Evaluation of the respiratory system
- Gastrointestinal examination
- Musculoskeletal examination
- Neurological evaluation
- Skin and lymphatic examination

We would also perform other ancillary testing as requested and/or indicated, upon CRCOG's approval and consistent with evidence-based medical standards and regulatory requirements.

## Pre-placement/Post-offer Physical Examinations

Concentra realizes that any medical examination must be "job-related and consistent with business necessity" (29 CFR 1630.14(b)). Pre-placement/post-offer physical examinations help ensure employees or prospective employees do not have a medical condition that:

- Prevents safe performance of the essential job duties
- Can be exacerbated by the job duties
- Affects the safety of the employee, co-workers, or others in the workplace

## Fitness-for-Duty Examinations

Fitness-for-duty examinations help ensure that employees can safely perform their job functions. Concentra therapists and clinicians are specifically trained to assess fitness for duty for injured employees and for employees who have medical conditions that could limit their ability to perform essential job functions.

A fitness-for-duty examination is performed when an employee:

- Has observable difficulty performing work duties in a manner that is safe for the employee, his/her coworkers, the employer, or the public, as determined by the employee's supervisor
- Poses an imminent and serious safety threat to self or others
- Returns to work from a non-work-related illness or injury

When an employee meeting the above conditions is referred to Concentra, our clinicians begin to implement our well-coordinated evaluation to identify issues that may be affecting performance. This begins with a comprehensive evaluation and communication with the employer to determine if the employee can return to his/her normal job or if a limited-duty arrangement is indicated. Our clinicians apply a three-phase methodology:

- **Phase 1:** Our clinicians work to understand the various jobs in the workplace and perform evaluations to ensure the employee can meet the essential job functions. We educate the employee on how to enhance function and encourage support from his/her supervisor.
- **Phase 2:** The employee undergoes a clinical examination to determine if he/she is medically able to perform his/her job; this may include a job-specific functional test. Once the medical evaluation is complete, Concentra's physical therapist conducts functional testing. In cases where the employee has other medical conditions (e.g. recent surgery or a cardiac condition), we seek clearance from the employee's primary care physician to proceed.
- **Phase 3:** Upon completion of the functional testing, our physical therapist provides the results to our physician, who combines the medical and functional test results and renders an overall "able to" or "not able to" return-to-work decision. If our clinicians believe additional testing is required to render a proper medical decision, we would seek CRCOG's authorization to proceed.

## Return-to-work Examinations

Concentra's longstanding methodology and practices expedite employees' safe and sustainable return to work. Our process includes immediate communication with the employer, careful job analysis, and a focus on avoiding or limiting an employee's lost time from work.

During a return-to-work physical examination, in addition to a review of the employee's medical history and existing documentation, the clinician performs a basic medical examination. The clinician determines if the employee is medically able to proceed with the functional performance evaluation. If the employee has a medical condition that precludes participation in a functional performance evaluation (e.g., recent back/knee/shoulder surgery, an active hernia, a cardiac condition), we require clearance from the employee's personal physician prior to the functional evaluation.

Once the employee has completed the required functional tests, the Concentra therapist documents a “pass/fail” result and the results are given to the clinician. The clinician then combines the medical results with the functional test results to render an overall “pass/fail” result for the employee. In some cases, our examining clinician may require additional testing to render a medical decision. However, we do not conduct any additional testing without authorization by the designated employer contact.

## Department of Transportation (DOT) Physical Examinations

*Concentra has been performing Department of Transportation (DOT) physical examinations for employers for the past 40 years. Annually, we perform more than 1,000,000 DOT physicals.* We maintain comprehensive policies and procedures for these examinations and thoroughly train our staff on each testing component. The Federal Motor Carrier Safety Administration (FMCSA) provides the physical requirements for commercial motor vehicle (CMV) drivers in 49 CFR 391.41. (Other DOT agencies may have prescribed different physical standards for their safety sensitive roles, such as pilots, rail conductors, etc.)

The purpose of the DOT examination is to detect the presence of physical, mental, or organic conditions of such a character and extent as to affect the driver's ability to safely operate a commercial motor vehicle. The examination must be conducted carefully and include (at least) all information requested in the applicable form. A history of certain conditions may lead to a disqualification or indicate the need for further testing and/or an evaluation by a specialist.

## Medical Examiner's Certificate

The DOT physical exam is performed by a certified medical examiner listed on the National Registry of Certified Medical Examiners. The exam includes a review of the employee's medical history; a physical exam with vital signs, vision, and hearing testing; and a urine test for blood, protein, and sugar to look for conditions that may impact a driver's ability to safely operate a vehicle. Following the examination, the results are automatically reported to the National Registry and state motor vehicle agencies, as required. If the driver passes, the ME provides the required Medical Examiner's Certificate (MEC). The certificate may be issued for up to 24 months; however, the Concentra ME may limit certification based on a driver's medical history.

## Firefighter Physical Examinations

Concentra conducts comprehensive physical examinations of firefighters. To begin, we require firefighters to complete a medical history questionnaire, which includes medical, personal, occupational, family, and medication history. A Concentra clinician reviews the questionnaire and performs a thorough physical examination, which focuses on the firefighter's ability to meet the physical demands required to perform the essential job functions identified by the fire department. The clinician also performs a medical examination to reveal any health conditions that could adversely affect job performance.

Examples of essential functions tested include:

- *Lifting/carrying* – Simulates the height/weight of a fan, jaws of life, chain saw, or portable ladder
- *Pushing/pulling* – Simulates the pulling/carrying the hose off the truck to the scene/fire hydrant
- *Upper body push/pull* – Simulates coupling the hoses to the hydrant/truck, using hand tools, and opening doors
- *Climbing* – Simulates accessing the fire ladder to reach victims and climbing stairs in structures

In addition, clinicians assess the firefighter for aerobic capacity, muscular strength and flexibility, and cardiovascular endurance. Concentra offers a variety of assessment testing including, but not limited to, the following:

- Body fat composition
- Sit/reach flexibility test
- Maximum muscular upper and lower body strength (hand-grip strength, pushups, curl-up muscle endurance)

*Please note, assessment testing components may not be included if the individual has already passed a physical abilities test.*

## **NFPA Standard 1582**

Concentra performs National Fire Protection Agency (NFPA) and International Association of Fire Fighters (IAFF) examinations for hundreds of municipalities across the United States. We maintain written protocols on all NFPA and IAFF standards and ensure that all personnel who deliver services have the appropriate certifications to perform audiograms, pulmonary function tests, and stress testing. Furthermore, we have physical conditioning protocols and perform job site analyses, physical fitness testing, and more to meet NFPA requirements for our clients.

**[Concentra maintains written protocols on all NFPA standards and ensures that our personnel have the appropriate certifications to perform audiograms and pulmonary function tests.]**

Concentra recognizes that appropriate physical condition is essential to a firefighter's safety, as well as the public's safety. As such, we share CRCOG's responsibility to ensure firefighters have the requisite physical and cardiac fitness to perform the essential job functions. Understanding the environmental conditions (including required use of personal protective equipment) in which firefighters perform, we assess their cardiovascular and muscular fitness, and follow fitness guidelines that address the physiological and psychological demands they face on the job.

## **Our Clinicians' NFPA Expertise**

Concentra clinicians are experts in their field and go through extensive occupational health care training specific to firefighters, in accordance with National Fire Protection Agency (NFPA) guidelines. They:

- Understand the physiological, psychological, and environmental demands placed on fire fighters
- Evaluate fire department candidates and employees to identify medical conditions that could affect their ability to safely respond to emergency operations
- Utilize the essential job task descriptions provided by the fire department to determine a candidate's or member's medical certification
- Identify and report the presence of disqualifying medical conditions
- Inform the fire department chief or designee if/when a candidate or current member is assessed as medically fit to safely perform the essential job functions

## **Confidentiality**

Concentra maintains the confidentiality of all medical data. Information firefighters provide to our clinician would not be inappropriately shared. No fire department supervisor or manager shall have access to medical records without the express written consent of the employee. There are occasions, however, when specific medical information is required to make decisions regarding placement, return to work, and so forth. In these cases, written consent shall be obtained from the employee prior to release of specific medical information.

## **ADA-compliant ADapt<sup>®</sup>**

Concentra developed ADapt<sup>®</sup>, a pre-placement and return-to-work process, in response to our clients' needs to make objective employment decisions, retain healthy and physically adept employees, and maintain compliance with the Americans with Disabilities Act (ADA).

The ADA does not prevent employers from obtaining medical and related information necessary to evaluate the ability of an applicant or employee to perform essential job functions or to promote health and safety on the job. However, to protect individuals with disabilities from employment actions based on information that is not job-related and consistent with business necessity, the ADA imposes specific obligations on the employer at the following three stages of the employment process:

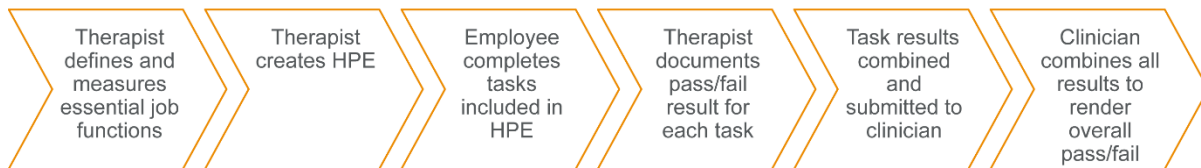
- Prior to making a job offer, an employer may not make any medical inquiry or conduct any medical examination.
- Following a job offer, an employer may make unrestricted medical inquiries, but may not refuse to hire an individual with a disability based on results of such inquiries, unless the reason for rejection is job-related and justified by business necessity.
- After employment, any medical examination or inquiry required of an employee must be job-related and justified by business necessity; exceptions are voluntary examinations conducted as part of employee health programs and examinations required by other federal laws.

Challenges of ADA compliance for the employer and occupational medicine provider include:

- The essential functions of each job must be determined.
- Any examination performed to provide recommendations regarding employment must be job-related and consistent with business necessity.
- All recommendations and resulting employment decisions must be consistent for all job applicants.
- The confidentiality of medical information must be maintained.

The ADAPT program:

- Ensures the pre-placement medical examination tests for the essential job functions
- Provides documentation of readiness of an applicant being placed in the appropriate job (and/or an injured employee being able to return to work)
- Furnishes the medical provider and employer with definitive information regarding essential functions of each job with measured criteria
- Assists in the reduction of workers' compensation costs by identifying employees who can safely perform the essential functions of the job



*Together, the human performance evaluation (HPE) and medical exam allow the clinician to determine a person's ability to perform essential job functions, which is critical to the client when making objective employment decisions.*

ADAPT consists of the following components:

Component	Purpose
Job-site Evaluation	Assist the employer in defining the physical abilities necessary to perform essential functions of specific jobs
Pre-placement/ Return-to-work Evaluation	Correlate the worksite evaluation information with a clinical evaluation that is "job related and consistent with business necessity"  This evaluation allows the employer to medically determine a person's ability to perform the essential job functions and objectively assess risk or direct threat
Education and Installation	Establish the ADAPT compliance program for the employer
Analysis and Compliance	Provide the employer with the necessary consistency of employment actions resulting from medical recommendations, and ensure confidentiality of medical information



## Job-site Evaluation

When performing the job-site evaluation, the physical therapist:

- Defines the physical abilities necessary to perform essential functions of the job with the employer supervisor
- Measures all physical abilities necessary to perform essential functions of the job
- Verifies with employees that the functions are essential
- Submits the job-site evaluation to the employer supervisor for confirmation

The job-site evaluation results in the following:

Task Description	Human Performance Evaluation (HPE)
The task description is a detailed listing of the functional and non-functional requirements and associated tasks involved in job performance. Task descriptions can be created in approximately 14 to 21 days, depending on the volume of jobs to be constructed. Task descriptions are reviewed and approved by client management.	The HPE is the job-related functional test used in the pre-placement or return-to-work exam process. The physical therapist requires seven to 10 days to create the HPE. Testing can commence within one week of the client's approval of the task description.

## Human Performance Evaluation/Job-specific Functional Testing

Following the job-site evaluation, our specialist develops an ADA-compliant, job-specific functional test that we refer to as a human performance evaluation (HPE). The HPE assesses individuals on the ability to perform the essential job functions (EJFs) and can be used for pre-employment and return-to-work testing.

The Concentra physical therapist begins by defining each physically distinguishable task involved in the job (i.e., lifting, carrying, pushing, pulling, etc.), including those tasks that have a definitive starting and ending point, occur with regularity, and require a level of quantifiable physical exertion. For each qualified biomechanical functional requirement, the physical therapist uses a force gauge to measure external weights, starting and ending heights, task frequencies, forces produced or overcome, climbing requirements, and more. This process adheres strictly to evaluation techniques that have a direct correlation to the functional requirements.

### HPE Components

Once the therapist has measured the EJFs, an HPE is developed to recreate the exact physical demands of the job as measured in the biomechanical evaluation. The job-specific functional test may include assessing any combination of the tasks listed below. However, this is not an all-inclusive list.

- **Lift/Carry:** "Vertically translating" or moving an object from a definitive starting height to a definitive ending height; start/end heights are measured at location of hands
- **Push/Pull:** Total body push/pull; manual or using assistive device (i.e. pallet jack)
- **UE PU/PL:** Upper extremity push/pull; no lower extremity involvement; manual or using assistive device
- **Couple:** True "grip" force required to perform action (e.g., activate power tool)
- **CLIMBL:** Accessing a ladder to perform job task
- **CLIMBS:** Accessing stairs/steps to perform job task
- **Walk:** Distance traveled during shift
- **Confined Access (Con Acc):** Dimensions of a space to be accessed (e.g., manhole)
- **Repetitive Posture Assumption (Rep Pos):** To access specified distance from ground
- **Limited Headroom (Lim Hdr):** Dimensions of a space that does not permit standing to perform task

- **Height Tolerance (Ht Tol):** The highest vertical distance from the ground (e.g., putting shingles on a roof)
- **Sit:** Amount of continuous time sitting
- **Stand:** Amount of continuous time standing
- **Vision:** Type of vision required to perform the essential tasks of the job
- **Temperature:** The environmental conditions present while performing the job

### Validation of Testing Methodology

Our methods of validation and examination techniques follow ADA requirements for pre-employment/post-offer testing and are the most defensible under ADA guidelines. Standard 29 CFR 1630.10 states, “The Uniform Guidelines on Employee Selection Procedures do not apply to the Rehabilitation Act and are similarly inapplicable to this part.” However, 29 CFR 1630.15 holds the defenses of such screening techniques to the same means as other claims under Title VII. When there is a need for screening techniques to be adapted to a disabled population, Concentra uses techniques that are “job-related and consistent with business necessity,” in accordance with ADA guidelines.

We evaluate tasks that:

Meet the definition of “essential function”

Are sufficiently quantifiable to be functionally tested by trained individuals

### HPE Testing Process

The physical therapist instructs the applicant of the goals of each testing service package included in the HPE and allows the applicant to perform one trial of a specific task as he/she deems most appropriate. If the applicant demonstrates poor knowledge of proper body mechanics and lifting technique during the first trial, the physical therapist instructs the individual by demonstrating good body mechanics and technique prior to proceeding with test.

The test is terminated if the applicant:

- Represents a significant threat or risk to self
- Requests to discontinue for any reason

### HPE Results Reporting

Once the individual has completed the required functional tests, the physical therapist documents the “pass/fail” results and gives them to the clinician. If the individual fails, the physical therapist documents the reason and records observations on the testing form. The clinician combines the medical results with the functional test results to render an overall “pass/fail” result for the individual.

## Drug and Alcohol Testing

### Non-DOT and DOT-Compliant Urine Drug Screens

Concentra conducts **all** urine drug testing in full compliance with Department of Transportation (DOT) rule 49 CFR Part 40 (Procedures for Transportation Workplace Drug and Alcohol Testing) and adheres to all Substance Abuse and Mental Health Services Administration (SAMHSA) policies and procedures to ensure appropriate chain of custody. By following these procedures in both federal and non-federal testing, Concentra simplifies the collection process, offers the most defensible procedures for our collectors and clients, and provides the optimal level of confidentiality for the donors.

Our typical process includes:

- Certified staff to perform collections
- Use of split specimen collection method as required by DOT
- Use of the proper custody and control forms (CCF) for regulated and non-regulated testing, using electronic CCFs when possible
- Proper specimen containment
- Shipment of specimen, within 24 hours, to a SAMHSA-certified laboratory for analysis
- Involvement of a Medical Review Officer (MRO) for follow-up review, as appropriate

## Concentra Collectors

Concentra's collector certification course meets and exceeds the DOT training model. To help ensure consistency among all Concentra markets in adhering to DOT regulations, we developed a three-phase *Collector Certification Program*. Our policy is that all collectors (new hires and existing) successfully complete each phase of the program prior to Concentra certifying the individual to perform drug screen collections. Concentra's intention is to maintain high standards and quality throughout the collection process. *To that end, although DOT regulations require refresher training to occur within five years, Concentra requires refresher training for all collectors every 2.5 years.* If the collector does not complete refresher training within the designated timeframe, we do not allow him/her to perform DOT collections.

We summarize each phase of our Collector Certification Program in the following table.

### Phase One: Study Guide and Quiz

Intranet study guide and quiz (required prior to attending Phase Two)

### Phase Two: Classroom Instruction

- Interactive instruction
- Hands-on collection training
- Written examination (85 percent pass rate required for certification)
- Completion of Collector Acknowledgement Form

### Phase Three: Proficiency Examination

- Five consecutive, error-free mock collections
- Two uneventful collection scenarios
- One "insufficient quantity of urine" scenario
- One "temperature out-of-range" scenario
- One scenario in which the donor refuses to sign the CCF and initial the specimen bottle's tamper-evident seal

## Collection Process

Concentra uses the DOT-required split specimen collection method, when possible. DOT collection specimens are tested for substances outlined in the most recent regulations. The certified collector and appropriate laboratory adhere to the following guidelines:

- Collect a minimum of 45 milliliters (ml.) of urine
- Divide the specimen into two bottles, 30 ml. in one and 15 ml. into a second bottle
- Seals the specimen appropriately
- Transport each specimen to the laboratory within 24 hours
- Once received, the lab analyzes the primary 30 ml. bottle while the second bottle is held pending a request from the employee for a second test in the event of a verified positive of the primary test result

## Observed Collections

We acknowledge that in certain instances, direct observation may be required, and Concentra can meet this requirement.

## Chain of Custody

When collecting urine specimens, Concentra adheres to all SAMHSA policies and procedures to ensure appropriate chain of custody to document the integrity and security of the specimen from the time of collection until receipt by the laboratory. *For DOT collections, we use the federal chain of custody and control form (CCF); for non-regulated drug screens, we use the non-federal CCF.*

Specific to DOT testing, Concentra completes the federal CCF in accordance with SAMHSA guidelines, as we outline below:

- Collector ensures that the name and address of the drug testing laboratory appears on the top of the CCF and that the specimen ID number on the top of the CCF matches the specimen ID number on the labels/seals

- Collector provides the required information in step 1 on the CCF and provides a remark in step 2 if the donor refuses to provide his/her Social Security or employee ID number
- Collector gives a collection container to the donor to provide specimen
- After the donor gives the specimen to the collector, the collector checks the temperature of the specimen within four minutes, marks the appropriate temperature box in step 2 on the CCF, and provides a remark if the temperature is outside the acceptable range
- Collector checks the split or single specimen collection box:
  - ✓ If no specimen is collected, the collector checks that box, provides a remark, discards Copy 1, and distributes the remaining copies as required
  - ✓ If it is an observed collection, the collector checks that box and provides a remark
- Donor watches as the collector pours the specimen from the collection container into the specimen bottle(s), places the cap(s) on the specimen bottle(s), and affixes the label(s)/seal(s) on the specimen bottle(s)
- After affixing the labels/seals, the collector dates the specimen bottle label(s)
- Donor initials affixed and dated specimen bottle label(s)
- Collector turns to Copy 2 (MRO Copy) and instructs the donor to (1) read the certification statement in step 5 and (2) sign, print name, date, provide phone numbers, and date of birth; if the donor refuses to sign the certification statement, the collector provides a remark in step 2 on Copy 1
- Collector completes step 4 (i.e., provides signature, printed name, date, time of collection, and name of delivery service), immediately places the sealed specimen bottle(s) and Copy 1 of the CCF in a leak-proof plastic bag, releases specimen package to the delivery service, and distributes the other copies as required

## Specimen Transport

Once the specimen is sealed, a courier picks up the specimen from the collection site via automobile. The collector or collection site must ensure that each specimen collected is shipped to a laboratory as quickly as possible, but in every case, within 24 hours. Specimens are picked up one to two times per day depending on the volume of drug tests being administered at the center location.

## Laboratory Urine Drug Screening

### Initial Screening Test

A high-sensitivity enzyme immunoassay (EIA) screens for the presence of commonly abused drugs. At this stage, test results equal to or greater than a calibrated immunoassay cutoff concentration identify presumptively positive specimens. Each batch contains both negative and positive quality control samples along with one blind quality control sample that is inserted into the batch in a random position.

### Laboratory Urine Screen Confirmation Test

For specimens that do not screen negative initially, confirmatory drug testing is performed by gas chromatography/mass spectrometry (GC/MS), liquid chromatography/mass spectrometry (LC/MS), or any other technique recognized by the U.S. Department of Health and Human Services (DHHS) and Substance Abuse and Mental Health Services Administration (SAMHSA).

The concentration of drug or drug metabolite in each donor specimen is determined by comparison of the response of the specimen to the response of calibrators of known concentration. As with the screening test, each batch contains both negative and positive quality control samples along with one blind quality control sample that is inserted into the batch in a random position. If required, confirmation testing for specimen validity is performed by the same or, if available, a second definitive method that can be utilized to identify specimens as adulterated, substituted, or invalid. Each confirmation test is performed on a second aliquot that is obtained from the original specimen container and all confirmation batches contain appropriate quality control samples to verify the performance of the procedure.

- If a donor specimen has a concentration of drug that is less than the employer-specific cutoff, the specimen is determined to be negative for the confirmation test.

- If a donor specimen has a concentration of drug that is greater than or equal to the employer-specific cutoff, the specimen is determined to be positive for the specific test.

Laboratory positives are transmitted to the Medical Review Officer (MRO.) The MRO gathers all test data, interviews the donor, and confirms the result as positive or negative. The result is posted only after MRO verification.

## **Breath Alcohol Testing**

Concentra conducts breath alcohol testing using an evidential breath testing (EBT) device selected from the National Highway Traffic Safety Administration (NHTSA) Conforming Products List for both screening and confirmation testing. To ensure quality results, we calibrate each EBT device daily and after every positive result, without exception. Records of the calibration are filed with a retention period of five years. In addition, personnel performing breath alcohol testing are trained and certified as breath alcohol technicians (BAT) in accordance with Department of Transportation (DOT) guidelines.

### **Initial Test**

Typically, breath alcohol tests that register less than 0.02 g/210 L are reported as negative (for the purposes of DOT) and no additional testing is required. Breath alcohol tests that register 0.02 g/210 L or greater require a second confirmatory test.

### **Breath Alcohol Confirmation Test**

If the confirmatory test is less than 0.02 g/210 L, the results are reported as negative. Breath alcohol results that register 0.04 g/210 L or greater on the confirmation test are immediately reported to the employer. A result that registers 0.04 g/210 L or greater is considered a DOT positive result.

## **Medical Review Officer (MRO) Services**

When the laboratory confirms a non-negative result, Concentra enlists a Medical Review Officer (MRO) through our preferred vendor for review of the result. An MRO assistant ensures the MRO copy and the laboratory copy of the chain of custody and control form (CCF) are transmitted timely, as the MRO does not initiate a donor interview until receiving the MRO copy of the CCF and does not transmit verified results until receiving the laboratory copy. If the MRO is unable to obtain either copy, the MRO reports a "canceled" test.

The MRO makes three or more attempts in a three-day period to reach the donor (barring unforeseen circumstances, such as donor's phone disconnected). The MRO interviews the donor to determine if there is a legitimate medical explanation for the non-negative result. The MRO can ask medically related questions (which the donor's employer cannot ask under the Americans with Disabilities Act) to validate or invalidate a non-negative laboratory result.

The MRO's standard responsibilities include:

- Conform to DOT Regulation 49 CFR Part 40 in the performance of all services and data transmissions for DOT and non-DOT drug tests
- Provide an MRO assistant to review all test results and CCFs under the MRO's direct supervision
- Receive appropriate copies of the CCF within 24 hours of the collection; if collection sites do not adhere to this requirement, Concentra provides appropriate follow up and training
- Store MRO records within regulatory requirements and best practices to maintain confidentiality
- Facilitate blind sampling for all laboratories, per DOT regulations
- Adhere to federal guidelines when coordinating the collection site process
- Transmit results via a secured network; SAMHSA-certified laboratories produce an export file from their information management system and send it across their internal network in an encrypted file, restricting access

## Clinical Screenings

A range of clinical screening services are offered at Concentra centers. We perform screenings on equipment that has been thoroughly examined and calibrated so that results are as timely and accurate as possible. Some services listed below may not be available at all onsite and can be customized as determined by the employer.

The following table summarizes our clinical screening capabilities:

Type of Test	Details
Audiometric Screening	<p>All audiometric screening conforms to the Occupational Safety and Health Administration (OSHA) standard 29 CFR 1910.95. We have Council for Accreditation in Occupational Hearing Conservation (CAOHC)-certified technicians to perform the tests, and we would provide all certifications upon request. Concentra's services specific to audiometric screening include:</p> <ul style="list-style-type: none"> <li>Audiometers that pause screening if ambient sound levels temporarily exceed OSHA levels</li> <li>Immediate Standard Threshold Shift (STS) identification and retest capability</li> <li>CAOHC-certified hearing specialists</li> <li>Acoustic Systems audio booth professionally designed and installed in each clinic</li> <li>Daily equipment calibration</li> <li>Microprocessor audiometers</li> </ul> <p>Please note: Concentra cannot test hearing in people who wear hearing aids as this requires specialized equipment. People with hearing aids need to be tested by an audiologist and then submit the results.</p>
EKG (resting)	Concentra performs a 12-lead EKG that measures the electrical activity of the heart, read by a center clinician.
Pulmonary Function Testing	A technician performs all pulmonary function testing that allows real-time graphic and numeric data to verify the test validity. Data returns of VC, FEV1, PEFR, FEF 25 percent-75 percent, and FEV1/FVC are required.
Vision	<p>A trained technician performs a vision test that meets OSHA standards for visual acuity. The technician screens for visual acuity with corrective lenses, lateral and vertical phorias, stereo depth perception, and color discrimination.</p> <p>For visual acuity testing, we utilize the Snellen chart for distance vision, and the Ishihara book to assess color vision.</p>
Vitals	A trained technician records resting pulse rates and blood pressure using a hospital grade sphygmomanometer and stethoscope. Any person who does not meet normal pulse rate or blood pressure criteria is re-tested.
Stress Tests	These tests will be performed by our preferred subcontractor Consulting Cardiologists. There are 10 locations in Greater Hartford Region.
X-rays	All posterior-anterior X-rays are performed by registered X-ray technicians and certified B-readers review selected chest X-rays in accordance with OSHA regulations.

## Vaccination Services and Infectious Disease Screenings

Concentra offers vaccination services and screening/testing for infectious disease to assist employers in maintaining a healthy workforce. We administer vaccinations and infectious disease screenings per regulatory requirements and recommendations from leading health organizations, including the Occupational Safety and Health Administration (OSHA), Centers for Disease Control and Prevention (CDC), and the World Health Organization (WHO).



## Vaccinations / Immunization

The following table describes common vaccinations we administer for immunization. It also describes specialty vaccinations, such as those required and/or recommended for a traveling workforce, which are offered at selected Concentra locations.

Vaccine	Comments
<b>Hepatitis A Vaccine</b>	The hepatitis A vaccine should be offered when a high occupational risk for infection is present (e.g., travel to a developing country or working with hepatitis A in a research laboratory). Consideration may be given to vaccination of employees who work in areas where community-wide outbreaks are occurring, sewage workers, and workforces where state and local health authorities or private employers determine that such vaccination is cost-effective or desired. The hepatitis A vaccine is also indicated for post-exposure prophylaxis.
<b>Hepatitis B Vaccine</b>	<p>OSHA requires the hepatitis B vaccine be offered to employees at risk for bloodborne pathogen (BBP) exposures through contact with blood or other potentially infectious material (OPIM) (e.g., health care personnel, emergency responders, first-aid personnel, correctional officers, laundry workers in hospitals, and morticians). The vaccination must be offered post-exposure if the employee is not already immune. Within 15 days of the completed evaluation, the clinician completes a health care professional's written opinion for the employer indicating whether the hepatitis B vaccine is indicated for an employee and if the employee has received the vaccination. The hepatitis B vaccine is also recommended for many international travelers.</p> <p>In addition to the three-dose hepatitis B vaccine (Engerix-B or Recombivax), we offer the new hepatitis B vaccine, Heplisav-B, which is a two-dose series over one month, instead of three doses over four to six months.</p>
<b>Hepatitis A and B combined</b>	For individuals who need immunity to both hepatitis A and hepatitis B, Concentra offers the Twinrix vaccine, which is a combined hepatitis A and hepatitis B vaccine.
<b>Hepatitis B Immune Globulin</b>	HBIG is recommended after certain exposures to blood or other potentially infectious material (OPIM) if the source is unknown (e.g., needle stick from a sharps container) or is positive for hepatitis B and the exposed employee is not immune.
<b>Influenza Vaccine</b>	The influenza vaccine is recommended annually for all individuals age six months and older as it is the best way to prevent the flu. The flu can significantly affect productivity and increase absenteeism among workers. As appropriate, Concentra discusses with the employer the specifics regarding administering the shots and anticipated volumes.
<b>Japanese Encephalitis Vaccine</b>	The Japanese encephalitis vaccine is recommended for certain travelers to endemic areas of Asia.
<b>Measles, Mumps, Rubella (MMR) Vaccine</b>	Per CDC recommendations, all health care personnel should have presumptive evidence of immunity to measles, mumps, and rubella. Those without presumptive evidence (i.e., documentation of receiving the vaccine or laboratory evidence of disease or immunity) should be vaccinated. Screening bloodwork (titers) prior to vaccination may be cost-effective but is not required. Other indications for MMR vaccine include international travel.
<b>Meningococcal Vaccine</b>	This vaccine is recommended or required for certain international travelers and laboratory personnel who are routinely exposed to meningococcal bacteria. College freshman living in dormitories, military recruits, and people with certain medical conditions are also recommended for vaccination. There are two types of meningitis vaccines: the quadrivalent meningococcal ACWY and the meningitis B vaccine. The latter is not routinely indicated for international travel.

Vaccine	Comments
<b>Polio Vaccine</b>	The polio vaccine may be recommended or required for certain international travelers.
<b>Rabies Vaccine</b>	People at high risk of exposure to rabies (e.g., veterinarians, animal handlers, rabies laboratory workers, spelunkers, and rabies biologics production workers) should be offered pre-exposure rabies vaccine. Rabies vaccine is also recommended for pre-exposure for certain international travelers. The rabies vaccine may also be recommended after being bitten or scratched by an animal or otherwise exposed to rabies. In the case of post-exposure, rabies immune globulin (RIG) is also recommended if the person had not completed the rabies vaccine series for pre-exposure.
<b>Tetanus, Diphtheria, Pertussis (Tdap) Vaccine</b>	A one-time dose of Tdap is recommended for all adults and adolescents. The CDC recommends all health care personnel receive a single dose of Tdap as soon as feasible if they have not previously received Tdap, regardless of the time since their most recent Tetanus/diphtheria (Td) vaccination. Tdap is also recommended for women during every pregnancy.
<b>Typhoid Vaccine</b>	Typhoid vaccine is often recommended for international travelers to the developing world. Typhoid fever is spread by the fecal-oral route, such as ingesting contaminated food or water. There are two forms of the vaccine: an injectable vaccine that lasts for two years and an oral vaccine that lasts for five years.
<b>Varicella (chickenpox) Vaccine</b>	Per CDC recommendations, all health care personnel without evidence of immunity (e.g., written documentation of two doses of vaccine or laboratory evidence of immunity) should be vaccinated. Screening bloodwork (titers) prior to vaccination may be cost-effective but is not required.
<b>Yellow Fever Vaccine</b>	The yellow fever vaccine is recommended or required for certain travelers to Africa and South America. This vaccine can only be administered in a facility where a physician has applied for state authorization. On certain itineraries, an employee may be denied entry if proof of yellow fever vaccine is not presented to local officials.
<b>Other Vaccines</b>	Other vaccinations, including but not limited to vaccines to prevent shingles, human papillomavirus (HPV), cholera, pneumococcal disease, and immune globulin may be administered at Concentra facilities upon request and clinical approval.

## Laboratory Services Vendor

Concentra would utilize our preferred vendor, Quest Diagnostics Incorporated (Quest) for laboratory analyses.

Established in 1990, Quest possesses more than 30 years of experience providing exceptions services in the field of laboratory testing. Quest Diagnostics Clinical Laboratories, Inc., a subsidiary of the parent company, has four forensic drug testing laboratories certified by the Substance Abuse and Mental Health Services Administration (SAMHSA) and accredited by the College of American Pathologists-Forensic Drug Testing (CAP-FDT); three of the labs are also Clinical Laboratory Improvement Amendments (CLIA)-certified.

Each of Quest's forensic toxicology laboratories is certified by the Department of Health and Human Services (DHHS)/SAMHSA to perform urine drug testing under the federal program. The four SAMHSA certified laboratories are compliant with SAMHSA guidelines as detailed in the Federal Register 73 (228): 71858-71907 (11-25-2008) and the DOT's 49 CFR Part 40 rules, detailed in Federal Register 65 (244): 79462-79579 (12-19-2000), and any subsequent revisions. The DOT, Nuclear Regulatory Commission (NRC), Federal Railroad Administration (FRA), Pipeline and Hazardous Materials Safety Administration (PHMSA), and the FMCSA all require this certification.

Each laboratory is licensed by the state where the laboratory is located. Quest's drug testing procedures and laboratories are also fully certified and accredited by federal government agencies, and professional organizations such as the Agency for Health Care Administration (AHCA) Florida and CLIA.

Of relevance, Quest:

- Performs services in all 50 states and the District of Columbia (DC), Puerto Rico, Mexico, and the United Kingdom
- Performs more than 11 million drug and alcohol tests annually
- Performs more than 300 million clinical tests each year
- Is trusted by more than two-thirds of the nation's hospitals
- Is the preferred laboratory of choice for more than 200,000 physicians
- Impacts more than 70 percent of the health care decisions made by physicians today

We outline Quest's capabilities in the following table.

Substance Abuse Testing	Clinical Testing
<ul style="list-style-type: none"> <li>▪ A comprehensive menu of both standard and customized panels</li> <li>▪ Specialized test panels and adulterant testing, including expanded opiate and DOT and HHS panels</li> <li>▪ A range of specimen options, including urine, oral fluid, hair testing, and breath alcohol testing</li> </ul>	<ul style="list-style-type: none"> <li>▪ A national network of laboratories with locations in or near all major cities, so there is always a lab nearby</li> <li>▪ Two full-service, bicoastal, esoteric testing laboratories for fast turnaround on specialized testing</li> <li>▪ Additional clinical laboratory testing options including, but not limited to: OSHA, industrial, heavy metals, esoteric testing, and executive health panels</li> </ul>

## Onsite Services

CRCOG would benefit from a partnership with Concentra as our vision, mission, and values set the path forward. Our decades of experience working with employers in a range of industries and our demonstrated success managing onsite programs makes us the optimal choice. As a compliment to the freestanding Concentra medical centers and onsite clinics, Concentra has created an offering in which selected volume-based services could be performed at a CRCOG site. These "event-type" services bring health care to the CRCOG site at a scheduled time, which could save employees time away from work while providing needed clinical testing. This is also a cost-effective option to have many employees undergo health care services during various shift times.

Our solution is:

- Carefully constructed to meet CRCOG's program requirements, reduce health care costs, and positively impact the value of your investment
- Focused on keeping employees healthy at work
- Designed with an emphasis of employee engagement and a superior health care experience for high levels of satisfaction and utilization

Concentra's episodic services include, but are not limited to:

- Audiometric testing
- Chest X-rays
- Cancer screening
- Drug and alcohol testing
- EKGs
- Firefighter testing
- Heavy metal screenings
- Labs services

- Physical exams
- Respirator clearance/fit testing
- TB testing
- Vaccinations
- Vision testing

Concentra believes keeping your employee at work and productive. With episodic services:

- Timing and convenience are critical. Concentra delivers episodic occupational health services directly to your worksite on a one-time or ongoing basis without any long-term commitment.
- Employees aren't required to leave work to attend events to ensure minimal interruptions to their work day.
- Concentra brings you a range of episodic offerings and continues to look for new and better ways to bring services to you and your employees.

### Event Dates and Times

Concentra would work closely with CRCOG to identify dates and times for provision of episodic services. We would work with CRCOG to ensure the selected dates and times allow for provision of services to all employees who may need care. To coordinate logistics, scheduling, and pricing for an onsite event we would need to meet with the requesting entity. Pricing varies based on volume, components and timing which would be discussed in a planning call.

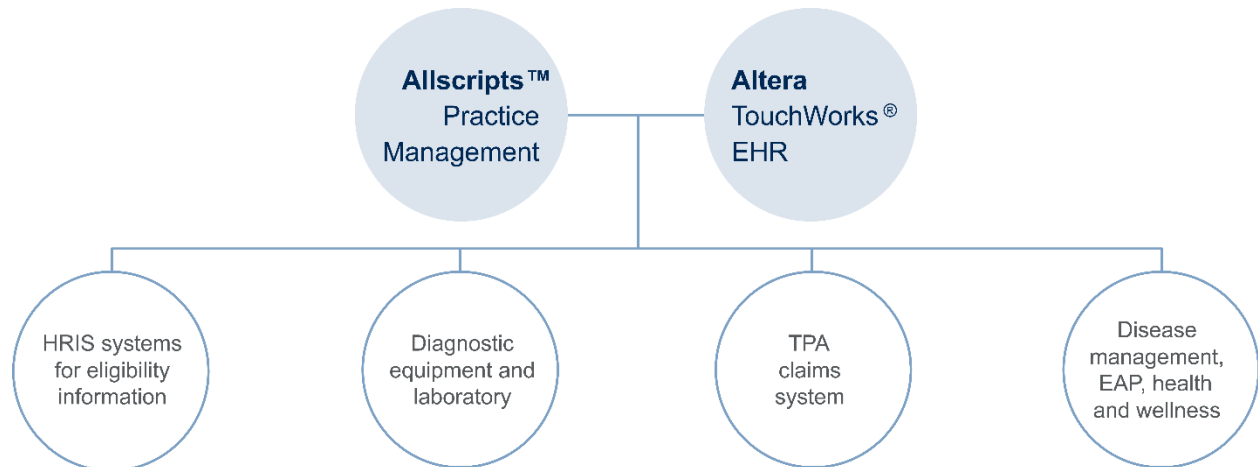
### Technology

Altera TouchWorks<sup>®</sup> Electronic Health Record (EMR) enables our clinicians to access patient records from any Concentra medical center, onsite clinic, Concentra Telemed, or Concentra TeleRehab site in the country. Our EMR integrates with practice management systems and supports continuity of patient care and an exceptional customer experience. Allscripts provides:

- Computerized order entry and management with electronic integration with laboratory and X-ray vendors
- Supports both onsite dispensing and pharmacy e-prescribing
- Customized clinical documentation templates to support clinical operations
- Best practice, evidence based, diagnosis specific care guides
- Integrated tasking and communication function

Allscripts supports all clinical operations, improves clinical quality, and streamlines the information exchange process to afford our clinicians the ability to quickly and accurately communicate information to CRCOG and your employees. The system also provides data-driven insights, allowing us to apply population management principles for measurable trend management. Our ability to capture member data in real time from multiple sources helps us learn the health and social behavior patterns unique to each individual and CRCOG's population in the aggregate.

The following illustration depicts the various features of an APM/Touchworks technology solution:



## Concentra HUB

Concentra offers a self-service, online tool for CRCOG's convenient access to account information, test results, and reporting. Concentra HUB uses advanced security software to ensure privacy and the protection of employee information.

- Online account management
  - ✓ Access to make edits to your company and location addresses and contacts
  - ✓ View capabilities of all service packages, components, and payors, third-party administrators, and medical review officers (MROs)
- Timely updates to your employees' non-injury and injury visit results and work restrictions
  - ✓ Full integration of existing employer reports for easy access
  - ✓ Search, export and print functionality for all accessible reports
- Ability to create, manage, and review employee authorizations online
  - ✓ Electronic creation and transmission of authorization and associated forms
  - ✓ Saving the authorization sends it to Concentra automatically; no need for employee to bring form
  - ✓ Option to print and email authorization to employee is available, but not required
  - ✓ Search, edit and copy authorization functions
- Enhanced security features protect your information
  - ✓ Access control
  - ✓ Database monitoring
- Malware and virus protection
- Intrusion detection and prevention

## Standard Reporting

Individual patient encounters provide the basis for the reporting system. Our system would create a report for each employee seen at Concentra and would make it available to CRCOG via the Concentra HUB. Concentra can set up notification for multiple contacts, if desired. The following table outlines examples of our standard visit-based report output.

Sample Reports and Communications	
Non-Injury Status Report	<ul style="list-style-type: none"> <li>▪ Generated after each non-injury visit</li> <li>▪ Includes the employee's name and demographics, date seen, time checked in and out of the center, results, and remarks</li> </ul>
Patient Referral	<ul style="list-style-type: none"> <li>▪ Generated when a referral to a specialist takes place</li> <li>▪ Includes basic demographics, billing information, specialist information, and referrals details (i.e., type of referral, recommendations, priority, notes)</li> </ul>

## Results Reporting

### Physical Examinations

Concentra evaluates and reports all medical information back to an employer's designated representative within 24-48 hours of receiving all relevant data. The report provides a recommendation based on the results, and any recommended referrals and/or restrictions. The clinician notes if additional testing is necessary and advises of the clearance status for job placement. If the results require supplemental testing, Concentra would notify CRCOG's designated representative prior to performing any additional testing. *Depending on the specific components tested for (i.e., blood or urine analysis), results may take up to five days to report.*

### Drug and Alcohol Testing

Concentra's average turnaround time for a negative drug screen result is 24-48 hours upon receipt at the laboratory. Turnaround time for a non-negative drug screen result, including Medical Review Office's (MRO) review, varies for non-DOT and DOT tests, and may take 48 to 72 hours depending on the MRO verifications.

- For a non-DOT non-negative drug test, MRO review is at the employer's discretion and results can take 48 to 72 hours once received at the lab.
- MRO review is required for all DOT non-negative drug tests. While we can report a non-negative result to the MRO within 48 hours, the average turnaround time for a non-negative DOT drug screen review by the MRO varies. Per DOT guidelines the donor has up to ten days to contact the MRO before the MRO reports a result.

Breath alcohol test results are reported the same day the specimen is obtained.

### Injury Care

For injury care, we provide employers an activity status report immediately upon employee checkout that includes:

- General employee demographics
- Basic employer information
- Visit information, including name of treating provider and diagnosis
- Employees' status, including any restrictions, and return-to-work status
- Name of treating provider
- Date, time, and provider for next scheduled appointment

We also notify the employer of any issues or concerns regarding return-to-work status.

## Administrative and Support Services

### Appointment Scheduling

Concentra would provide CRCOG's employees with prompt service. Although our medical centers are primarily "first come, first serve," Concentra can accommodate scheduled appointments if requested, with 24 hours' advance notice. Concentra understands CRCOG's requirement is to provide all medical services within five business days of request by member. Concentra would put forth best efforts to meet the program scheduling goal. In addition, our medical centers implement "fast track" drug/alcohol testing services where employees experience a 30-minute-or-less wait time for drug specimen collection and/or breath alcohol testing.

### Billing and Invoicing

Concentra's Central Business Offices (CBO) maintain responsibility for all aspects of revenue billing and collection within their designated regions, including bill production, cash receipt, payment posting, and account receivable management services. We outline our standard billing process in the following table.



Service Type	Billing/Invoicing Details
Non-Injury Care	<ul style="list-style-type: none"> <li>■ Invoices generated weekly by market</li> <li>■ Includes a minimum of the following for each line item: patient name, date of service, employee's department location (if provided), complete list of services performed</li> <li>■ Term is net 30 days</li> </ul>

## Patient Confidentiality

Concentra takes the privacy, security, and protection of confidential and personal information very seriously and we have enterprise-wide strategies and industry leading technologies to maintain compliance with the HIPAA Privacy and Security Regulations.

Concentra's Compliance department incorporates all aspects of HIPAA, information security, privacy, and compliance into our initial colleague training upon hire and annually thereafter. New privacy and security laws and challenges including high profile topics such as phishing, social engineering, and data handling procedures are communicated through corporate communications (e.g., Concentra intranet, internal newsletters, and face-to-face educational programs) on a quarterly basis. We have HIPAA policies and procedures in place to ensure on-going compliance with the HIPAA Privacy and Security Regulations.

We also employ:

- A HIPAA-compliant Business Associate Agreement (BAA) with any third-party whose services provided, and data shared, are subject to the HIPAA regulations
- Concentra-owned, internal documentation systems on our servers, all of which are protected by firewalls and anti-virus technologies that are monitored daily
- A secured intranet for all internal documents and a secured virtual private network (VPN) for authorized remote access
- HIPAA policies and procedures that outline the required privacy and security requirements for handling, maintaining, and disposing of personal health information (PHI)
- Contracted service with a bonded (HIPAA-compliant) vendor to manage the shredding and recycling of paper documents located internally in locked cabinets within our office space (as per the HIPAA guidelines). Our vendor provides an approved form of identification, picks up and removes all materials from our offices, and obtains required signatures from our bonded workers
- Password protected access to all sensitive client files and access only to those staff members with a need to know, who require the files to support direct client services
- Acknowledgement of our HIPAA compliance for all employees within new hire and annual training
- HIPAA regulations regarding proper consent prior to sharing individual PHI with any party, i.e., client (employer), insurance company, or other provider(s), as required

## Commitment to Service Excellence

Concentra's customer service philosophy is focused on going above and beyond to deliver a superior patient experience. This philosophy is at the root of our core values and motivates Concentra team members in their ongoing pursuit of excellence.

Concentra has a long and distinguished history and we are proud of our role in shaping the occupational health care consumer experience. We recognized that the people we served were expecting more and better services from their health care providers. As a result, Concentra took steps that would revolutionize care delivery and shift the paradigm to create a best-in-class occupational health care approach. We worked with leading consulting firms specializing in customer satisfaction to build and refine our methodology. We benchmarked our approach against other consumer-driven organizations (i.e. Southwest Airlines, Starbucks and Nordstrom), meeting with their executive teams and incorporating their best practices. In addition, Concentra worked directly with Fred Reichheld, a Fellow at Bain & Company and the bestselling author of "The Loyalty Effect" and "The Ultimate Question 2.0" (see page 240 for Concentra reference) to create and shape our program. What started as a good business exercise became a virtual movement at Concentra. We:

- Redesigned our medical centers for a more customer-friendly layout and look
- Redefined our mission/vision/values
- Developed our award-winning “Orange Book” – a ‘how to’ guide for Concentra team members with specific, common-sense actions that create great service
- Established the Concentra Hall of Fame, recognizing colleagues who embody outstanding service and exemplify our core values

The impact of this effort and our commitment to delivering a superior experience is evident in our patient and customer satisfaction scores even today.

## 4. Key Personnel

### Program Management

Concentra carefully considers each project and its unique goals when assigning an account management team. We take a collaborative approach that combines local operational and clinical support to ensure quality and service excellence. The individuals we select bring valuable, relevant experience to the program and provide ongoing support within their respective areas of expertise.

#### Initial Contact

**Justin Timpano, Director of Sales**, would be responsible for ensuring Concentra colleagues know and understand your program requirements and would be available to answer your questions throughout the solicitation and initial phase of engagement.

##### Credentials

- 12 years with Concentra
- 12 years of experience
- Batchelor's Business Management

#### Operational Oversight

**Andrea Farley, Center Operations Director**, would serve as the day-to-day contact for program operations. This individual regularly monitors processes and procedures to ensure ongoing compliance with applicable regulations and guidelines, as well as program specifications. The Center Operations Director (COD) is invaluable to the success of the program and is available to answer questions, address issues, and ensure the program continues to operate efficiently.

##### Credentials

- 1 year with Concentra
- 13 years of experience

- Serves as the liaison between Concentra and CRCOG
- Oversees day-to-day medical center operations
- Implements and ensures ongoing compliance with operational policies, procedures, and training programs within the center
- Manages patient care issues and other center issues requiring resolutions
- Establishes a clear understanding of contract objectives and deliverables to ensure successful execution of programs and projects
- Collaborates with center, area, and regional leadership teams to ensure we effectively deliver the stipulated scope of work, monitors program outcomes, and maintains CRCOG's account

##### Credentials

- 4 years with Concentra
- 13 years of experience
- LICENSURE & CERTIFICATIONS (Expiration Date) Medical Review Officer Certification Council Training in Process US Civil Surgeon Designation, CSID:110215 Active as of 09/2022 Board Certified in Specialty of Occupational Medicine #32-20459 12/2031 Active DEA License 7/2023 DATA Waiver 7/2023 State Medical License (Permanent, Full, and Unrestricted) • Active, Connecticut #53822 5/2023 4 National Registry of Certified Medical Examiner (DOT) #7302449670 5/2025 BLS/CPR certified 5/2023 National Provider Identifier (NPI) #1487946372

#### Medical Oversight

**Dr. Erik Benitez, Center Medical Director**, would provide primary oversight for clinical practices, ensuring continued compliance. The Center Medical Director (CMD) ensures that medical interpretations and associated clearances comply with the most recent medical standards and guidelines and adhere to applicable regulations. The CMD's expertise relevant to the desired scope of work is instrumental in the provision of services.

- Reviews medical history and performs medical physical examinations
- Reviews medical evaluations conducted by other center clinicians

- Understands all medical surveillance requirements of the Occupational Safety and Health Administration (OSHA), the U.S. Department of Transportation (DOT), the National Fire Protection Association (NFPA), police officer standards, the Americans with Disabilities Act (ADA), the Family and Medical Leave Act (FMLA), and other regulated examinations
- Reports the results of the medical evaluation to the employee, including any medical condition(s) identified during the evaluation
- Provides the recommendation as to whether the employee is medically certified to safely perform the essential job tasks
- Forwards copies of any abnormal results, along with instructions regarding primary care follow-up, to individuals who are instructed to seek medical follow-up to address any medical conditions or abnormal laboratory results identified during an evaluation
- Provides or arranges for a prescriptive rehabilitation and/or fitness program, when indicated, to aid in an employee's recovery from illness or injury and enhance his/her ability to safely perform essential job tasks
- Reviews individual medical evaluations and aggregate data to detect evidence of occupational exposure(s) or clusters of occupational disease

## Physical Therapy and Functional Testing Oversight

**Alison Metz, Center Therapy Director**, would provide oversight for the physical therapy and functional testing services rendered as part of the program. The Center Therapy Director (CTD) is an expert in this field and possesses a wide breadth of knowledge overseeing physical therapy and functional testing services for other area clients. Using this expertise, the CTD delivers services that objectively assess an employee's functional abilities and expedite the return-to-work process.

### Credentials

- 25 years with Concentra
- 25 years of experience
- Master's in physical therapy, certification, MDT

- Conducts an initial evaluation on clinician referrals and develops appropriate treatment plans
- Ensures treating clinicians have the necessary information to appropriately evaluate an employee's functional ability
- Communicates with all clinicians and with the employer regarding an employee's diagnoses, sets expectations for return-to-work, emphasizes education and motivation, and discusses specific rehabilitation issues and early intervention opportunities
- Utilizes knowledge of best demonstrated practices and quality indicators to evaluate and measure program effectiveness, and implements methods to improve processes and outcomes
- Ensures compliance with guidelines and regulations established by the Americans with Disabilities Act (ADA) and by the relevant licensing, certification, and accrediting bodies

## Center Staff

Concentra employs skilled and experienced health care professionals to deliver services relevant to our offering. Center staff includes an appropriate combination of physicians, mid-levels, nurses, physical therapists, radiology technicians, and medical assistants.

### Clinical Professionals

Concentra utilizes qualified and appropriately licensed and credentialed clinical professionals to serve the occupational health needs of a client's workforce. These professionals are skilled in their respective areas of expertise and undergo extensive annual training in addition to continuing education classes. Furthermore, our clinical professionals are vigilant in applying their knowledge to recognize and diagnose potential exposures and resulting health issues. They regularly monitor OSHA, DOT, NFPA, police officer standards, ADA, and other applicable federal and state regulations to ensure all associated services remain in compliance and adhere to best practice guidelines.

### Support Staff

Concentra employs qualified support personnel whom we train and fully certify to perform their associated tasks. Specifically, our center support staff includes drug specimen collectors certified to perform DOT collections, certified breath alcohol technicians, National Institute for Occupational Safety and Health (NIOSH)-certified pulmonary function testers, Council for Accreditation in Occupational Hearing Conservation (CAOHC)-certified personnel to perform audiometric testing, certified radiologic technologists, certified medical assistants, and certified phlebotomists.

### Credentialing Practices

All Concentra clinicians undergo a stringent credentialing process. Once the Credentials Committee Chair/Medical Advisor clears the candidate for hire/credentialing, we follow National Committee for Quality Assurance (NCQA) guidelines for credentialing, which require primary source verification of licensure, education and training, board certifications, and any provider sanctions. In addition, we perform a System for Award Management (SAM) query to identify if a candidate is barred from contracting with the federal government and use secondary sources (copies of documentation) to verify Drug Enforcement Administration (DEA) and state controlled substance certifications. Finally, we check the National Practitioner Databank for malpractice history and the Office of Inspector General (OIG) for Medicare/Medicaid sanctions. We re-credential our clinicians every three years and, in the interim, we monitor clinicians' licensures to ensure that they remain active and current.

All Concentra personnel, regardless of position, are required to have a background check consisting of a felony/misdemeanor check, Social Security validation and trace, national sex offender check (for staff rendering patient care), national criminal search, drug screen, and a check against the Office of Foreign Assets Control list.

## 5. History and Background

Concentra was founded by physicians in 1979. Since then, we have grown to be the largest provider of occupational health services in the country. Our footprint includes more than 520 medical centers in the United States with unmatched occupational health expertise and clinicians. We know how to deliver care that works for companies and their employees.

Operating as a division of Select Medical, Concentra is a leading health care company focused on improving the health of America's workforce, one patient at a time. Through its affiliated clinicians, the company currently provides occupational medicine, urgent care, physical therapy, and wellness services from more than 520 medical centers nationwide. In addition to these medical center locations, Concentra currently serves employers by providing a broad range of health advisory services and operating more than 110 onsite clinics.

Concentra:

- Treats one in every five workplace injuries in the United States and has treated more than 18 million injured employees since 1979
- Is the largest urgent care and occupational health care provider in the United States
- Performs more than 2 million physicals and 3.1 million drug screens annually
- Treats approximately 60,000 patients a day from its 525 medical centers and more than 110 onsite clinics
- Partners with 85 percent of the Fortune 500, 100 percent of the Fortune 100, and more than 239,000 employers nationwide

## Products and Services

Concentra offers an extensive suite of services, categorized as follows:

Concentra's Suite of Services	
<b>Occupational Health Care</b> <ul style="list-style-type: none"> <li>▪ Pre-placement services, including examinations, substance abuse testing, etc.</li> <li>▪ Regulatory and employer mandated physicals</li> <li>▪ Medical surveillance examinations</li> <li>▪ Clinical testing (X-ray, audiograms, PFT, EKG)</li> <li>▪ Work-related vaccinations and infectious disease screenings</li> <li>▪ Travel health</li> <li>▪ Functional capacity evaluations</li> <li>▪ Human performance evaluations</li> <li>▪ Office and industrial ergonomic evaluations</li> <li>▪ Occupational therapy</li> <li>▪ Medical advisory services</li> <li>▪ Utilization review services (Medical ReviewStream™)</li> </ul>	<b>Injury Care</b> <ul style="list-style-type: none"> <li>▪ Primary work-related injury care (workers' compensation)</li> <li>▪ Workplace injury medication dispensing* and prescribing</li> <li>▪ Physical therapy</li> <li>▪ Specialist care</li> <li>▪ Return-to-work examinations</li> <li>▪ COVID-19 evaluation for return to work</li> </ul> <p><i>*Where allowed by state law.</i></p>



### Concentra's Suite of Services

#### Urgent Care

- Diagnosis and treatment of minor non-work-related illnesses and injuries, such as colds, flu, skin conditions, back pain, and sprains
- Over 350 different types of laboratory tests
- X-rays
- Immunizations
- Infectious disease tests and screenings

#### Preventive Care

- Biometric screenings
- Vaccinations/immunizations
- Immigration examinations
- School and sports physicals

#### Pharmacy Services\*

- Pre-packaged formulary
- Medication dispensing for occupational medicine and travel health\*
- E-prescribing
- Mail-order prescribing

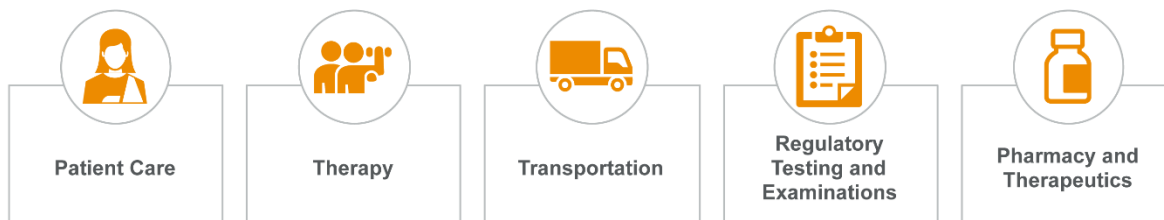
*\*Where allowed by state law.*

#### Training and Education

- General injury prevention education
- Job-specific injury prevention education
- Workplace Office and Industrial stretching and exercise programs
- Back care and back injury prevention
- Wellness and illness prevention education
- Online drug and alcohol training (CMCA)

## Medical Expertise

Concentra's Clinical Advisory Board (CAB) directs and oversees overall company clinical operations in all Concentra medical centers and onsite clinics. The Board's goal is to develop and disseminate guidance and policies for all Concentra clinicians in the various areas of patient care to continually improve the quality of health care Concentra provides, remaining relevant and forward-thinking in an evolving health care environment.



In addition, Concentra has developed national Medical Expert Panels to serve as resources to clinicians, clients, and patients. The clinicians on these panels work to identify health trends; research the latest developments; and develop policies, procedures, clinical guidance documents, and processes to ensure Concentra's treatment and service philosophy adhere to established industry best practices. These clinical experts research the latest medical literature and recommendations of national industry groups. Information is combined and integrated, then forwarded to our Clinical Advisory Board for review and approval. Once approved, the information is disseminated via continuing medical education courses, clinical bulletins, and direct review with the clinician's supervisor depending on the topic and relevance to the practice. CRCOG and its employees would benefit from this process which helps to ensure continual clinical program improvement.

## Clinical Experience

### Injury Experience

Concentra's injury treatment experience gave rise to our process management approach. We monitor and direct the processes and events that make up the structure and flow of an individual case, all with the

focus of achieving the optimal outcome. These processes and events include many variables, such as frequency and timing of injured employee visits, communication with the employer, and referral patterns for consultations and diagnostic testing.

This analysis of comprehensive outcomes data proves that the following factors have a considerable impact on the clinical and cost outcomes:

- Treating the injured employee at frequent intervals in the initial period following an injury
- Communicating with the employer about the activity/duty status of the injured employee
- Monitoring referrals to ensure that the injured employee is evaluated in a timely manner
- Paying attention to case closure following release to full-duty activity

### **Non-injury Experience**

Concentra has been performing physical examinations, conducting drug and alcohol testing, and administering immunizations and vaccinations since our inception more than four decades ago. We maintain written guidelines on all relevant regulatory standards and create client-specific service packages tailored to meet the unique needs of each client's program requirements. Furthermore, we assure that only qualified individuals perform the requested services, in accordance with all local, state, and federal guidelines.

### **Department of Transportation Experience**

Annually, Concentra performs more than 800,000 DOT examinations, making us the nation's largest provider of screening services for drivers of commercial motor vehicles. We provide DOT physical examinations for employers who operate in various industries, including:

- Aviation (FAA)
- Trucking (FMCSA)
- Railways (FRA)
- Public Transit (FTA)
- Maritime (MARAD)
- Pipelines and Hazmat (PHMSA), and more

Concentra maintains current, comprehensive knowledge of DOT rules and regulations. We require all Concentra physicians to be Federal Motor Carriers Safety Administration (FMCSA) National Registry certified to complete DOT examinations. In addition, Concentra offers the FMCSA curriculum as part of our training program to educate medical examiners on multiple topics within 13 different training modules on FMCSA regulations. Concentra's participants who complete the program are prepared to:

- Apply knowledge of FMCSA's driver physical qualification standards and advisory criteria to findings gathered during the driver's medical examination
- Make sound determination of the driver's medical and physical qualifications for safely operating a commercial motor vehicle (CMV) in interstate commerce
- Accurately complete the Medical Examination Report Form

As a recognized expert in DOT, Concentra also provides a suite of DOT-related services to keep employers and their drivers safe and compliant, including:

- DOT Drug Testing – DOT drug screenings test for the presence of illegal drugs, alcohol, and other substances
- Concentra's Sleep Evaluation Program – Objective and consistent evaluation of drivers who are at a risk of collision due to excessive sleepiness

- Concentra is proud of its experience and attributes much of our success to our resident experts. Former Concentra physician, Ellison Wittels, MD, FACP, was the former senior consultant to the FMCSA. Dr. Wittels chaired the 2002 Cardiac Advisory Panel, which was empowered to provide cardiac interpretive guidelines to all physicians performing DOT medical examinations.
- Due to our vast experience and relationship with the FMCSA, Concentra published a book, “Concentra Guide to Medical Certification of Commercial Drivers,” to create consistent medical interpretations for Concentra physicians. The Concentra Guide integrates and defines the federal standards, medical guidelines, recent literature, and opinion, thus, providing a consistent framework for the medical examiner’s assessment of the DOT-covered participant and determination of fitness. This led to Concentra physicians creating a training and certification course for non-Concentra physicians regarding DOT examination procedures and interpretations.

CRCOG would benefit from Concentra’s vast experience maintaining the health and safety of commercial drivers.

### **Firefighter and Police Officers Examination Experience**

For nearly 45 years, Concentra has performed examinations for firefighters, police officers, and other safety sensitive positions through our network of freestanding medical centers and employer onsite clinics. *Today we provide services to more than 1,500 fire, rescue, and police departments nationwide.* We maintain written guidelines on all firefighter and police officer standards and the regulations specified by the Occupational Safety and Health Administration (OSHA), National Fire Protection Agency (NFPA) Standard 1582, the Americans with Disabilities Act (ADA), and other applicable laws. Our clinicians delivering services have the appropriate certifications to perform the necessary clinical evaluations.

### **Firefighter Examination Experience**

Evaluating firefighter candidates to determine if they are physically capable of performing the essential functions requires special expertise. Candidates must be evaluated in conjunction with NFPA Standard 1582 guidelines — a standard established by individuals with fire safety expertise and approved by the American National Standards Institute. The inherent on-the-job requirements of a firefighter necessitate that candidates have the strength and fitness to crawl or walk extensively, climb stairs/ladders while lifting and carrying heavy objects, wear a self-contained breathing apparatus, ventilate roofs or walls using power tools and/or hand tools, and advance water-filled hoses. Understanding this, Concentra has created physical conditioning procedures and performed job site analyses, physical fitness testing, and more for hundreds of fire departments nationwide. We follow local, state, and federal guidelines, including NFPA and International Association of Fire Fighters / International Association of Fire Chiefs (IAFF/IAFC) standards, to ensure individuals in these positions are fit to perform their essential job functions.

### **Police Officer Examination Experience**

In performing their duties, police officers frequently face strenuous physical situations. They can be involved in combative incidents, including handcuffing, use of restraining devices, batons, locks, grips, holds, self-defense, and body force. As emergency responders, they can be required to run, jump, climb, crawl, walk extensively, lift, carry, drag, pull, balance, and push. In addition, police officers are often subjected to extreme psychological and emotional stress when dealing with aggression, violence, and cruelty, and must intervene in high-pressure, human crisis situations frequently. As such, it is imperative to provide thorough candidate evaluations and pre-screenings, and access to ongoing medical and psychological support for officers, to ensure the overall health and safety of these individuals. Concentra has extensive experience working with hundreds of police departments and other law enforcement agencies across the country to help ensure their officers are fit to perform their essential job functions. We adhere to all local, state, and federal guidelines, as well as each agency’s unique standards.

## 6. Attachments

In this section, Concentra includes the following information for the CRCOG's review:

- Attachment A - Required Forms and Documents
- Attachment B - Key Employee Qualifications

## **Attachment A**

### **Required Forms and Documents**

April 26, 2023

RE: Medical Services/Physicals for Firefighters, Pre-employment, DOT/Public Works, 2023-03-29 RFQ

**Additional Required Data**

- Concentra is legally licensed/registered to do business in Connecticut.
- Concentra is submitting this response to RFP 2023-03-29 without any collusion, communication, or agreement as to any matter related to the RFQ with any other respondent or competitor.



# Secretary of the State of Connecticut

## Certificate of Legal Existence

Certificate of Legal Existence Certificate

Date Issued: April 24, 2023

I, the Connecticut Secretary of the State, and keeper of the seal thereof, do hereby certify that the below corporation incorporated under the laws of United States / TX and transacting business in the state of Connecticut filed an application for certificate of authority to transact business in this office.

A certificate of withdrawal has not been filed, the corporation has filed all annual reports, and so far, as indicated by the records of this office, such corporation is authorized to transact business in Connecticut.

### Business Details

Business Name in State of Formation	OCCUPATIONAL HEALTH CENTERS OF THE SOUTHWEST, P.A., P.C.
Name used to transact Business in Connecticut	OCCUPATIONAL HEALTH CENTERS OF THE SOUTHWEST, P.A., P.C.
Business ALEI	US-CT.BER:0672987
Registration Date	02/06/2001



Secretary of the State

Business ALEI: US-CT.BER:0672987

Note: To verify this certificate, visit [Business.ct.gov](https://Business.ct.gov)

Certificate Number: C-00090847

## **Attachment B**

# **Key Employee Qualifications**

Alison M. Metz  
39 Windham Drive  
Simsbury, CT 06070  
(860) 651-8873

#### Education

1993 – 1997 Russell Sage College – Bachelor of Science in Physical Therapy  
1997 – 1998 Sage Graduate School - Master of Science in Physical Therapy

#### Certifications

- Cert. MDT (Mechanical Diagnosis and Treatment) through The McKenzie Institute
- CPR
- ADapt certification
- Ergo Science
- Advanced Ergo

#### Experience

1998 – Present – Concentra Medical Centers – Staff physical therapist/ Physical Therapy Director

##### Responsible for:

- Evaluation, treatment and discharge of work related injuries
- Managing PT staff of two physical therapists and two support staff
- Continuous communication with onsite medical providers, employers, insurance company nurse case managers
- Managing the clinic with operation and medical leadership to address issues and develop plans of action to meet company metrics and expectations
- Meeting with clients to promote PT early intervention philosophy
- Developing pre-employment work assessments
- Performing onsite evaluations to determine the physical demands of a job position and formulate job descriptions
- Tracking PT authorization

# Andrea Farley

## **OPERATIONS MANAGER**

Bloomfield, CT 06002

[andreaFarley777@gmail.com](mailto:andreaFarley777@gmail.com)

+1 860 922 3697

- Driven management professional versed in all aspects of running, developing and growing a fast paced, high end and successful business seeking office managerial opportunities.

## Work Experience

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### **Practice Manager**

42 North Dental - East Hartford, CT

August 2019 to Present

- Leads a professional team with both clinical and administrative members through coaching, development, motivation, and accountability.
- Creates a warm and welcoming environment for both patients and team members.
- Achieves monthly goals by empowering team members to maximize the patient experience through creating an environment of education and trust.
- Improves overall collections of the office by retraining our patients to expect to pay all copays on the date of service and by creating an environment of accountability for front desk team members.
- Creates team schedules based on the needs of the office to maximize on productivity.
- Ensures that provider schedules stay full by addressing cancelations immediately by utilizing reports and the short notice list.
- HR functions
- Facilitates team meetings.
- Handles patient satisfaction issues in a timely and professional manner.
- Increases EBITDA from month to month.

### **OPERATIONS MANAGER**

CLEARCHOICE DENTAL IMPLANTS CENTER

March 2018 to March 2019

- Successfully opened brand new center
- Recruited/Hired/Trained all new team members
- Customer service
- Steady increase from month to month in productivity through sales leadership
- Minimized surgical backlog through effective scheduling
- Coached and developed team members
- Maximized sales with add-ons/additional options
- Conflict resolution
- Created team member schedules to reflect the needs of the business
- Daily reconciliation of paperwork
- Credit card/cash management and deposit preparation
- Processed payroll
- Conducted daily huddles/weekly touch bases/ monthly team meetings

- Utilized financial reporting to create plans of action to increase sales by eliminating gaps in performance
- Created center cultural expectations, and the team had joint accountability in ensuring that we upheld them
- Improved EBITDA from month to month to ensure center profitability

## **OFFICE MANAGER**

ASPEN DENTAL

September 2017 to March 2018

- Increased productivity of location by making improvements in team training and accountability which led to greater patient satisfaction
- Delivered treatment plans that were recommended by the doctor in a clear and transparent manner
- Implemented all HR functions

## **GENERAL MANAGER**

LENSCRAFTERS

August 2010 to March 2017

- Top (Diamond) level General Manager in sales and performance
- Developed, supervised and managed staff engaged in sales, inventory maintenance and revenue reconciliation.
- Created and facilitated all employee schedules
- Charged with monitoring store receivables and daily revenue transactions
- Provided fair and timely resolution to customer inquiries and/or complaints
- As Regional Quality Captain, turned region into a top performer for sales goals through ensuring the manufacturing of quality eyewear
- Championed for giving back as the Store Captain for company's charitable partner One Sight
- Loss prevention management

## **ASSISTANT STORE MANAGER**

DAVID'S BRIDAL, MANCHESTER

January 2004 to August 2010

- Created a friendly, personal and welcoming environment for customers
- Facilitated high volume store daily operations in fast paced environment
- Recruited, hired and coached new employees for staff growth and developed future store leaders
- Restructured sales floor to meet ever changing bridal trends consistent with company plans and policies
- Organized and facilitated bridal shows in satellite locations
- Consistently exceeded in sales goals within growing market

## Education

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### **High school or equivalent**

## Skills

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- Management
- Operations

- Excel
- training
- Inventory Control



## CURRICULUM VITAE

**ERIK BENITEZ, M.D.**

(615) 336-5436 (Mobile)

[erik.benitez@concentra.com](mailto:erik.benitez@concentra.com)

### PROFESSIONAL EXPERIENCE

#### **Center Medical Director (acting)**

9/2020 - Present

Employer: Concentra Corporation

701 Main Street, East Hartford, 06457

As center medical director-(*acting*), entrusted to uphold medical oversight while providing clinical and operational leadership at the largest Concentra medical center in the state of CT. Serving an average of 150-200 patients daily running the spectrum of occupational medicine including evaluation and treatment of injured workers, pre-employment physicals, return to work physicals, and medical surveillance testing/examination. Using a team approach to drive organization improvement. Provide clinical staff supervision/training, mentor mid-level providers, maintain health records and cultivate collegial relationships within the industry. Report on medical operations and utilization management. Advocate pharmacovigilance and evidence-based medicine. Conduct audits, identify clinical/operational issues, introduce action plan and monitor ongoing quality improvement. In the capacity of a physician, deliver the full spectrum of occupational and environmental medicine. As well as managing a clinic with 13 examination room, and directing on-site emergency medical/surgical treatment, transport, consultations, and diagnostic testing.

#### *Notable Accomplishments:*

- Started in clinic pharmacy services to immediately dispense medications to injured workers to provide rapid treatment and improve overall patient satisfaction. (2019)
- Reduced unnecessary time off for injured workers to 1-2 days & increased return to work rate. (2019 – Current)
- Reduced unnecessary emergency runs and hospitalization. Through increased training and advocating evidence-based medicine, improved on onsite emergency assessment and medical management. (2019 – Current)
- Increased productivity and clinical volume to necessitate bringing on another full-time clinician (from 2 to 3 onsite providers). (2021 - Current)

#### **Staff Physician**

7/2019 - 9/2021

Employer: Concentra Corporation

701 Main Street, East Hartford, 06457

Providing comprehensive care and medical management in occupational and urgent care medicine. Provided clinical coverage throughout the various Concentra Clinics in the state of CT as the full-time float physician. Coordinating and directing on-site medical care, diagnostic services, and performance minor surgical procedures. Develop/maintain treatment plan, discuss therapy progress with the physical therapy team, and provide medical education for workers with injury or illness. Ordering appropriate diagnostic testing and analyzing results. Referring select cases to consulting specialist. Physician providing expert opinion on causation analysis. Performing comprehensive pre-employment and physical exam. Nationally registered certified medical examiner (NRCME) for the Department of

Transportation (DOT)-assigned to perform fitness for duty evaluation. Supervising clinical staff with oversight of mid-level providers and providing procedural training ancillary staff.

**Physician (Per Diem)**

1/2015 – 5/2017

Employer: Concentra Corporation  
701 Main Street, East Hartford, 06457

Providing care to the full scope of occupational medicine and environmental health. Pre-employment and wellness exams. Fit for duty evaluations and return to work exams. Performing NRCME DOT evaluations. Managing occupational injuries and urgent/emergency care. Performing complex layer closure and simple surgical extraction, nerve block. As well as directing general primary care and urgent care.

**PROFESSIONAL EDUCATION**

**MEHARRY MEDICAL COLLEGE (Graduate)**

7/2019

Master of Science in Public Health

**MEHARRY MEDICAL COLLEGE (Medical School)**

5/2011

Doctor of Medicine

**FLORIDA INTERNATIONAL UNIVERSITY (Undergraduate)**

5/2006

Bachelor of Science in Biology

**MIAMI-DADE COMMUNITY COLLEGE (Undergraduate)**

5/2003

Associates of Science in Biology

**POST-GRADUATE MEDICAL TRAINING (Internship/Residency)**

**MEHARRY MEDICAL COLLEGE**

6/2017 – 7/2019

Occupational Medicine

**YALE COLLEGE OF MEDICINE**

6/2014 – 12/2016

Vascular Surgery Research Fellow

**NEW YORK MEDICAL COLLEGE/WESTCHESTER MEDICAL CENTER**

6/2013 – 6/2014

General Surgery

**LEHIGH VALLEY HOSPITAL**

6/2011 – 6/2013

General Surgery

**LICENSURE & CERTIFICATIONS**

Board Certified in Specialty of Occupational Medicine #32-20459  
State Medical License (Permanent, Full, and Unrestricted)

**(Expiration Date)**

12/2031

- Active, Connecticut #53822

5/2023

Active DEA License

7/2023

National Registry of Certified Medical Examiner (DOT) #7302449670

5/2025

BLS/CPR certified

5/2023

National Provider Identifier (NPI) #1487946372

**PRESENTATIONS/PUBLICATIONS**

1. Return To Work Timing and Outcomes for Work Related Back Injuries, New England College of Occupational & Environmental Medicine, Annual Conference, December 2019, Presenter.
2. Return To Work Timing and Outcomes for Work Related Back Injuries, Meharry Medical College, Student Research Day Conference, March 2019, Presenter.
3. Pulse Volume Recording for Peripheral Vascular Disease in Diabetic Patients, Journal of Vascular Diagnostics, Issue 3, October 2015, Author.
4. Contemporary Assessment of Foot Perfusion in Patients with Critical limb ischemia, Seminars in Vascular Surgery, Multidisciplinary Care of the CLI patient, March 2015, Author.
5. Current concepts in Vascular Imaging, Podiatry Today, Volume 28, Issue 2, February 2015, Author.

**THESIS RESEARCH**

Return To Work Timing and Outcomes for Work Related Back Injuries. Thesis Defended, July 2019.

**HONORS & AWARDS**

Meharry Medical College - Student Research Day 2019,  
Resident Research Award-1<sup>st</sup> Place

2019

**PROFESSIONAL ORGANIZATIONS**

American College of Occupational & Environmental Medicine  
American College of Preventive Medicine  
New England College of Occupational & Environmental Medicine

**LANGUAGES**

Fluent in both written and spoken English & Spanish

## REFERENCES

1. Robert Sadock, MD (professional reference)  
Assistant Director of Medical Operations – Central New England, Concentra Corporation  
Concentra Corporation  
203-914-8143 Personal  
[robert\\_sadock@concentra.com](mailto:robert_sadock@concentra.com)
2. Sandra Fakult, MD (professional reference)  
Director of Medical Operations – Central New England, Concentra Corporation  
440-220-2183 Personal  
[sandra\\_fakult@concentra.com](mailto:sandra_fakult@concentra.com)
3. Frank Thomas, MD (professional reference)  
Center Medical Director – Tennessee, Concentra Corporation  
615-895-4855

CONCENTRA URGENT CARE  
Concentra  
701 MAIN ST  
EAST HARTFORD, CT 06108-3126

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Department of Public Health  
P.O. Box 340308  
Hartford, CT 06134-0308  
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Sincerely,



Manisha Juthani, MD  
Commissioner

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STATE OF CONNECTICUT DEPARTMENT OF PUBLIC HEALTH		
NAME		
ERIK BENITEZ, MD		
VALIDATION NO. 20241654	LICENSE NO. 53822	CURRENT THROUGH 04/30/2024
PROFESSION Physician/Surgeon		
ACTIVE		
SIGNATURE		COMMISSIONER

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PROFESSION Physician/Surgeon		
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SIGNATURE		COMMISSIONER



# The American Board of Preventive Medicine

Incorporated



*Organized to Encourage the Study, Improve the Practice  
and Advance the Cause of Preventive Medicine*

*This Certifies that*

**Frik Benitez**

*has satisfied the requirements of the Board and has hereby  
been awarded certification in the Specialty of*

**Occupational Medicine**

January 1, 2022 to

December 31, 2031

Certificate No. 32-20459



*Marilyn Edwards*  
CHAIR

*Jeffrey J. Stein*  
VICE CHAIR

*Christopher D. Allen*  
SECRETARY

*Attest: Members Board of The American Board of Medical Specialists*



# Jennifer Raye

## **Physician Assistant**

East Meadow, NY 11554

[jraye012488@icloud.com](mailto:jraye012488@icloud.com)

(781)913-8877

Hard working and compassionate Physician Assistant with over five years of experience in Family Medicine. Looking to expand medical knowledge while applying current skill set and working in a team setting.

Willing to relocate: Anywhere

Authorized to work in the US for any employer

## Work Experience

---

### **Senior Physician Assistant**

South Shore Family Medical - Inwood, NY

February 2016 to Present

- Evaluate, treat and chart 30-40 patients in an 8 hour shift
- Provide general primary and urgent care to patients
- Perform history and physical exams, phlebotomy, suture removal, and ekgs
- Provide patient education to promote preventive medicine and routine screening exams
- Educate patients on diabetes, hypertension, Coumadin monitoring along with appropriate diet and exercise regiments
- Interpret and order labs and radiological studies
- Provide emergent care to critical patients while coordinating swift transport to the ED

### **Physician Assistant Student**

Hofstra University

September 2014 to August 2015

Pediatrics - 6 weeks at Premier Pediatrics, Staten Island, NY

- Emergency Medicine - 6 weeks at Franklin Hospital, Valley Stream, NY
- Surgery - 6 weeks at Southside Hospital, Bayshore, NY
- Psychiatry - 6 weeks at South Oaks Hospital, Amityville, NY
- Cardiothoracic Surgery - 6 weeks at North Shore University Hospital, Manhasset, NY
- Family Medicine - 6 weeks at the private office of Dr. Zev Brandel, Baldwin, NY
- Internal Medicine - 6 weeks at Maimonides Medical Center, Brooklyn, NY
- Ob/GYN - 6 weeks at Long Island Jewish Hospital, New Hyde Park, NY

### **Medical Assistant**

Hope Orthopedics - Salem, OR

June 2009 to August 2009

Worked alongside orthopedic physician and physician assistants in a private orthopedic setting. Obtained vitals and medical histories of patients and inputted patient information into appropriate EMR documentation. Collaborated with physician and staff to expedite patient flow and reduce patient waiting times. Placed follow-up calls to patients after their visit to the orthopedic office.

## Education

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### **M.S. in Physician Assistant Studies**

Hofstra University - Hempstead, NY

December 2015

### **Bachelor of Science in Biology**

University of Massachusetts Amherst - Amherst, MA

2006 to 2010

## Skills

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- Phlebotomy
- Medical Imaging
- EMR Systems
- Patient Care
- Experience Administering Injections
- Vital Signs
- Venipuncture
- Medication Administration

## Additional Information

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### Community Service:

- Breast Cancer Walk 2015
- Blood/Bone Marrow Drive Volunteer 2013 - 2015

### Skills/Experience:

Proficient in history taking, physical exams, CPR, suturing, ABGs, abscess I+D, phlebotomy, IV insertion, performing and interpreting EKGs, NG Tube placement, Foley Catheter insertion/removal, IM/SC/ID injections, and splinting/casting. Additionally, had extensive training in caring for patients with developmental disabilities through the NYS DDPC Grant.

### Technical Skills:

- Microsoft Suite: Word, PowerPoint, Excel
- Clinical Systems: Computer charting and data entry, EDIMS, Meditech, Sunrise Medical, Allscripts, Horizon

JENNIFER RAYE  
95 susan drive  
Suffield, CT 06078


Dear Licensed Professional: This is your validated  
license for the coming year. Should you have any  
questions about your license, please email  
opl.c.dph@ct.gov.

Department of Public Health  
P.O. Box 340308  
Hartford, CT 06134-0308  
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Sincerely,

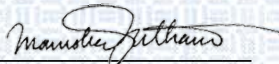



Manisha Juthani, MD  
Commissioner

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STATE OF CONNECTICUT DEPARTMENT OF PUBLIC HEALTH		
NAME		
JENNIFER RAYE, PA		
VALIDATION NO.	LICENSE NO.	CURRENT THROUGH
19811374	5324	01/31/2024
PROFESSION		
Physician Assistant		
ACTIVE		
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JENNIFER RAYE, PA		
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PROFESSION		
Physician Assistant		
ACTIVE		
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Lookup Detail View

Name

Name
JOHN M FARRELL

License Information

License Information

License Type	License Number	Expiration Date	Granted Date	License Name	License Status		Licensure Actions or Pending Charges
Physician Assistant	202	09/30/2023	10/15/1993	JOHN M. FARRELL	ACTIVE	CURRENT	None

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**Michael Eric Suls, D.O., M.P.H.**

**Workforce QA**

**1430 South Main Street**

**Salt Lake City, UT 84115**

**Email: msuls@wfqa.com**

**PROFESSIONAL**

**Workforce QA 12/2016-Present**

Chief Medical Review Officer

Salt Lake City, UT

- Perform drug test review, donor interviews and result determinations
- Consultant on medical surveillance and FMCSA compliance for third party clients
- Medical expert in the field of regulated drug and alcohol testing

**National Diagnostics Incorporated-Drug and Health Screening Solutions 9/2013-9/2016**

Charlotte, NC

Medical Review Officer

- Performed 1.5 million annual drug test review, donor interviews and result determinations
- Consultant on medical surveillance and FMCSA compliance for third party clients
- Medical expert in the field of regulated drug and alcohol testing

**Concentra Medical Center 2015**

Charlotte, NC

Independent Contractor

**Philadelphia College of Osteopathic Medicine-GA Campus And Concentra Medical Center-Occupational Medicine/Urgent Care 8/2011-2013**

Atlanta, GA

Assistant Professor

Independent Contractor

**Qualisys Employment Screening 5/2009 - 4/2011**

Kennesaw, GA

Medical Review Officer

- Performed drug test review, donor interviews and result determinations
- Consultant on medical surveillance and FMCSA compliance for third party clients

**Independent Contractor (Occupational Medicine/ Technical Advisor) 2007-2009**

**University Medical Center at Princeton 9/2005 - 12/2007**

Princeton, NJ

Assistant Medical Director-Corporate Health Services

**Virtua Memorial Hospital 9/2004 - 9/2005**

Westhampton, NJ

Assistant Medical Director

**Concentra Medical Center 8/2003-8/2004**

Secaucus, NJ  
Medical Director

**United States Naval Medical Center 4/1999 - 6/2001**

Corpus Christi, TX  
Flight Surgeon/Division Officer

**EDUCATION**

**University of Maryland**

College Park, MD

**1988-1992**

B.S. (Biology)

**Philadelphia College of Osteopathic Medicine**

Philadelphia, PA

**1993-1997**

D.O.

**United States Naval Medical Center**

Portsmouth, VA

**1997- 1998**

Internship-Internal Medicine

**University of Medicine and Dentistry of New Jersey (UMDNJ)-Robert Wood Johnson Medical School**

Piscataway, NJ

**2001- 2003**

Resident in Occupational Medicine

**UMDNJ-School of Public Health**

Piscataway, NJ

**2001-2003**

M.P.H. (Masters of Public Health)

**BOARD CERTIFICATION**

- Occupational Medicine-National Board of Physicians and Surgeons
- Certified Medical Review Officer-American Association of Medical Review Officers

**MEDICAL LICENSURE**

- Georgia, North Carolina, Utah

**MEMBERSHIPS AND ASSOCIATIONS**

- American Association of Medical Review Officers
- National Registry of Certified Medical Examiners  
Number: 5861978788



# MROCC

## Medical Review Officer Certification Council

certifies that

Michael Suls, D.O., M.P.H.

has successfully met all eligibility and examination criteria

and is hereby designated a

Certified Medical Review Officer

Certification Number: 20-13565

Effective from November 25, 2020

to November 25, 2025



STATE OF UTAH  
DEPARTMENT OF COMMERCE  
ACTIVE LICENSE

**Michael Eric Suls**

EFFECTIVE  
11/07/2017

EXPIRATION  
05/31/2024

REFERENCE NUMBER(S), CLASSIFICATION(S) & DETAIL(S)

10587214-1204 Osteopathic Physician & Surgeon

SIGNATURE OF HOLDER

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MICHAEL ERIC SULS  
317 E SHERMAN AVE  
SALT LAKE CITY UT 84115

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DEPARTMENT OF COMMERCE  
DIVISION OF OCCUPATIONAL & PROFESSIONAL LICENSING  
ACTIVE LICENSE

EFFECTIVE DATE: 11/07/2017  
EXPIRATION DATE: 05/31/2024  
ISSUED TO: Michael Eric Suls

REFERENCE NUMBER(S), CLASSIFICATION(S) & DETAIL(S)

10587214-1204 Osteopathic Physician & Surgeon

SIGNATURE OF HOLDER