EXHIBIT A

ARCHULETA COUNTY
POLICY AND PROCEDURES REGARDING
SECURE TRANSPORTATION SERVICES

I. Purpose

It is the policy of the Archuleta County Board of County Commissioners that all providers of secure transportation services and the vehicles used for secure transportation services comply with local and state laws and regulations, specifically C.R.S. §§ 25-3.5-103, 25-3.5-309, 25-3.5-310, 25-3.5-311, and 25-3.5-313 as well as 6 CCR 1011-4.

II. Policy

The following procedures are intended to facilitate the licensing and permitting of secure transportation services and the vehicles used for such services. This Policy is subject to interpretation by the Archuleta County Attorney's Office.

III. Definitions

The definitions contained in C.R.S. § 25-3.5-103 *et.seq.*, as may be amended from time to time, shall apply to this Policy and procedures, unless the context clearly requires a different meaning. One definition of particular relevance is "secure transportation" or "secure transportation services", which shall mean urgent transportation services provided to individuals experiencing a behavioral health crisis and includes:

1. An individual being transported from the community to a facility designated for treatment and evaluation;
2. An individual in need of services from any location to an approved treatment facility, or a walk-in crisis center that is operating as part of a behavioral health crisis response system; or
3. An individual who is receiving transportation across levels of care or to a higher level of care.

"Secure transportation" does not include urgent transportation services provided by law enforcement or personnel employed by or contracted with a law enforcement agency.

IV. Applicability

This Policy applies to all public or private businesses within Archuleta County who provide transportation services within the boundaries of Archuleta County, with the exception of ambulance agencies, transportation services provided by the state or county department of human services, emergency service patrols established pursuant to C.R.S. §27-81-115, and law enforcement.

V. Secure Transportation Services License

Applicable secure transportation service businesses are required to have a valid County-issued license for their business beginning January 1, 2023. Licenses are valid for three years and have the following two licensing options:

A. Class A – services that may use physical restraint during secure transport; or

B. Class B – services that shall not use physical restraint during secure transport.

Requirements for Licensing: Owners of new secure transportation service businesses must obtain a Secure Transportation license and vehicle permit(s) prior to beginning operations and upon change of ownership of a secure transportation service.

VI. Staffing Requirements

A. Manager/Administrator: Each applicable secure transportation service operating within Archuleta County must have a manager and administrator who meets the following minimum requirements:

1. Be at least twenty-one (21) years of age, possess a high school diploma or GED;
2. Have at least one (1) year documented supervisory experience in the provision of secure transportation services - or be qualified by education, knowledge, and experience to oversee the secure transportation services provided;
3. Be able to communicate, understand, and respond effectively to the client, family representatives, and other providers and be able to use appropriate translator services as needed;
4. Be familiar with all applicable local, state and federal laws and regulations concerning the operation and provision of secure transportation services;
5. Be in good standing with any state regulatory agency if the manager or administrator is licensed or certified with the Colorado Department of Regulatory Agencies or the Colorado Department of Public Health and Environment; and
6. Have passed a background check that was performed by the secure transportation service or owner prior to the assumption of responsibilities. The manager or administrator shall not conduct their own background check or any required follow-up.

B. Any changes regarding the manager or administrator of record must be provided to the Licensing Coordinator within fourteen (14) business days of the change.

C. Staffing: Every secure transportation service's staffing requirements must include, at a minimum:

1. All drivers must possess a current and valid Colorado driver's license.

2. If a Type 1 (partitioned) vehicle is being used for the secure transport, then the following shall apply:
    i. A 1:1 ratio of client to staff member shall be maintained during the transport; this staff member may *also* be the driver. If one (1) client is being transported, then one (1) staff member with a current and valid certification for all training topics is required to staff a vehicle permitted for each secure transport. If more than one client is being transported, then one (1) staff member who possesses a current and valid certification for all training topics is required to accompany each individual client during transport.

3. If a Type 2 (non-partitioned) vehicle is being used for the secure transport, then the following shall apply:
    i. A 1:1 ratio of client to staff member shall be maintained during the transport, in addition to the driver who is *not* included in this staffing ratio requirement. If one (1) client is being transported, then two (2) staff members are required to staff the vehicle. At minimum, the staff member who is not the driver will have a current and valid certification for all training topics.

4. Each secure transportation service must have a policy in-place related to background checks for all staff members. Such background checks shall take place prior to an individual providing secure transportation services. The policy shall include, at a minimum:
    i. The secure transportation service's responsibility to conduct a background check on every existing and prospective staff member.
        a. If any background check reveals prior convictions of a violent, fraudulent, or abusive nature, the manager or administrator shall inquire further to determine the potential impact on client safety in accordance with the policies developed by the secure transportation service.
        b. If an individual is hired despite a background check that reveals a prior conviction of a violent, fraudulent, or abusive nature, the manager or administrator shall document the reasons for hire and plans for supervision.

5. Each secure transportation service must have established the following minimum staff training requirements for all staff that must be completed prior to providing secure transportation services, and annually thereafter, or as recommended by the relevant training organizations:

i. Cultural competencies including, but not limited to, supporting persons with physical or cognitive disabilities, language accessibility, and accessing interpretive services;
ii. In-person or online verbal de-escalation training sessions that prioritize client and staff safety and inform restraint requirements set forth in Part 8.3, 6 CCR 1011-4;
iii. Trauma-informed care principles;
iv. Evade and escape violent encounter strategies;
v. Internal policies and procedures applicable to the secure transportation service and staff, including, but not limited to the staff disciplinary policy;
vi. Client rights; and
vii. Compliance with applicable privacy laws.

6. Each secure transportation service must have established the following additional minimum staff training requirements for all staff with direct client contact:
   i. Adult and Youth Mental Health First Aid as offered by educational institutions or by professional organizations such as mentalhealthfirstaid.org, or the equivalent;
   ii. Basic First Aid and CPR: and
   iii. Care of clients with substance use disorders.

7. Each Class A secure transportation service must have also established the following additional minimum staff training requirements for all staff who may utilize physical restraint during secure transportation of clients:
   i. Circumstances and protocols governing the permissible application of individual physical restraint during secure transport; and
   ii. Safe application of individual physical restraint on clients during secure transport.

8. Each staff member with direct client contact must possess a certification or proof of having completed the required coursework.

VII. Quality Management Program (QMP)

A. Each secure transportation service operating within Archuleta County must have an ongoing quality management program ("QMP") that is appropriate to the size and type of the service. The program shall incorporate a plan that evaluates the quality of client care and safety and has the following policies and procedures including, at a minimum:

1. The incorporation of the substantiated findings of any complaint into its QMP for the purpose of evaluating and implementing systemic changes where needed.

2. The general description of the types of cases, problems, or risks to be reviewed and criteria for identifying potential risks.

3. Identification of the staff members responsible for coordinating quality management activities.

4. A description of the method(s) for:
    i. Investigating and analyzing the frequency and causes of individual problems and patterns of problems;
    ii. Taking corrective action to address the problems, including prevention and minimizing problems or risks;
    iii. Evaluating corrective action(s) to determine the effectiveness of such action(s); and
    iv. Coordinating all pertinent case, problem, or risk review information with other applicable quality assurance and/or risk management activities, such as review of client care, review of staff conduct, the client complaint system as described in Section XI of this Policy, and education and training programs.

5. Documentation of required quality management activities, including cases, problems, or risks identified for review; findings of investigations; and any actions taken to address problems or risks.

6. A schedule for program implementation not to exceed ninety (90) days after the date of the issuance of the secure transportation service license.

7. A schedule for program evaluation to periodically assess the effectiveness of services and review the clinical and operational protocols and compliance with such protocols.

8. The utilization or application of data collected pursuant to Section XIII.A of this Policy to inform the quality management plan.

9. A written disciplinary policy that addresses a process for staff quality improvement.

B. The secure transportation service shall make available the quality management plan to Archuleta County during the initial and renewal license applications.

C. Archuleta County, the Colorado Department of Public Health and Environment (the "Department"), or any other appropriate regulatory agency having jurisdiction for disciplinary or licensing sanctions shall have access to any records, reports, and other information of the quality management program.

VIII. Secure Transportation Vehicle Permit

Each vehicle used by a licensed secure transportation service is required to have a valid County-issued permit for the vehicle beginning January 1, 2023.

A. Permits are valid for one year and have the following two types of permitting options:

1. Type 1 – vehicle with a safety partition that separates the driver from the passenger compartment; or

2. Type 2 – non-partitioned vehicle.

B. Requirements for Licensing:

1. All client and crew vehicle safety standards must be followed.

2. All vehicles must demonstrate proof of compliance with Federal Motor Vehicle Safety Standards on the date of manufacture.

3. All vehicles must undergo routine vehicle maintenance and periodic checks in accordance with manufacturer recommendations.

4. All vehicles must have the following safety features:
   i. Four doors;
   ii. Ligature risk reduction measures;
   iii. Child safety and window safety locks;
   iv. Global Positioning System (GPS) tracking;
   v. Occupant protection, including seat belts, supplemental inflatable restraints, and child safety seats (as applicable);
   vi. Cabin temperature control and ventilation system;
   vii. Be absent any foreign items or instruments in the secured area that may be used to inflict harm; and
   viii. Mirror for monitoring the client or capability for visual observation of the client.

5. If a Type 1 vehicle with a safety partition that separates the driver from the passenger compartment is being used for the secure transportation service, then the vehicle must have the following additional safety features:
    i. Permanent installation of all safety partitions; and
    ii. For vehicles with a cargo area, a safety partition must also be installed that separates the passenger compartment from the cargo area

6. All vehicles must be equipped with the following:
    i. First aid kit;
    ii. Fire extinguisher;
    iii. Wireless two-way communication (public safety radio, commercial land mobile radio, or wireless telephone);
    iv. Biohazard bag;
    v. Personal protective equipment for each occupant as per public health recommendations; and
    vi. Map of service area.

7. If a licensed secure transportation service utilizes physical restraint as part of its services, the vehicle shall additionally be equipped with the following:
    i. Automated external defibrillator (AED);
    ii. Non-metal, soft posey-type restraints; and
    iii. Device intended to prevent a client from spitting or biting that does not restrict the client's airway or breathing ability and does not pose a ligature risk.

IX. Application Process

A. All applications, whether for a secure transportation service license, a secure transportation vehicle permit, or both, can be downloaded from the County website at: www.archuletacounty.org. Questions related to the applications can be directed to the Licensing Coordinator at (970) 264-8308 or via email to licensing@archuletacounty.org.

B. Applicant shall contact the County Vehicle Inspector at (970) 264-8412 or via email to fleet@archuletacounty.org to schedule an appointment for a vehicle(s) inspection.

C. Once all documentation is completed and the vehicle inspections have been done, applicant shall contact the Licensing Coordinator at (970) 264-8308 or via email to licensing@archuletacounty.org to schedule the application review.

D. Upon completion of the application review, applications will be placed on the next available agenda for the Board of County Commissioners' (the "Board") for final review and approval.

E. Upon Board review, the Licensing Coordinator will notify the applicant of the Board's findings and when/if the approved license and permit(s) will be available for pick-up.

F. For secure transportation service licenses, applicants must provide:

1. Completed license application.

2. Certificate of occupancy or other documentation that the applicant's premises were found be in compliance with applicable local requirements.

3. Proof of a minimum level of worker's compensation consistent with the Colorado Worker's Compensation Act.

4. Copy of a written policy and procedure manual, operational protocols, medical protocols (if applicable), training procedures, or other relevant documents.
    i. Policies and procedures must follow national best practice guidelines where available that address, at a minimum:
        a. Appropriate procedures to assess initially whether the client requires a higher level of transport than the service can provide;
        b. Appropriate procedures to follow when, during a secure transport, it becomes apparent that a client needs medical attention or a higher level of transport than the service can provide;
        c. Appropriate procedures to confirm the receiving facility's acceptance of the client prior to initiation of the secure transport;
        d. Criteria used for pickup and drop-off, including the circumstances that determine a secure transport client's eligibility;
        e. The level of support and protection needed for both client and staff safety;
        f. Compliance with vehicle safety standards and procedures;
        g. Proper evacuation of the vehicle during emergencies if the windows and/or exits of the vehicle are blocked or inaccessible;
        h. Infection protection and control, including the decontamination of the vehicle after each transport;
        i. Parental and/or guardian level of support and involvement;
        j. Meeting client needs on extended transports including meals, water and bathroom breaks; and

k. Documentation of all steps in the process from initial pickup request to drop-off, including but not limited to documenting all stops made during the secure transportation service.

5. Payment of Secure Transportation Service license fee

G. For secure transportation vehicle permits, applicants must provide:

1. Completed permit application (one for each vehicle).

2. Certificate of Mechanical Inspection (to be completed by a qualified motor vehicle mechanic) (one for each vehicle).

3. Proof of motor vehicle insurance coverage with Archuleta County identified as certificate holder.

4. Proof of general liability and applicable professional liability insurance coverage, at a minimum:
    1. Liability insurance for injuries in the amount of $1,000,000 for each individual claim;
    2. Liability insurance in the amount of $3,000,000 for all claims made against the secure transportation service or against its personnel from an insurance company authorized to write liability insurance in Colorado;
    3. Liability insurance coverage to the maximum extent required by Section 24-10-114, C.R.S., as applicable, if the secure transportation service is granted qualified immunity under the Colorado Governmental Immunity Act, Section 24-10-101, *et.seq.,* C.R.S.; and
    4. Proof of any additional insurance as identified in county resolution or regulations.

5. Payment of Secure Transportation Service Vehicle permit fee

X. Renewal of License and Permits

Secure transportation service licenses are valid for three years. Secure transportation service vehicle permits are valid for one year. Renewal applications are processed in the same manner as new applications.

Applicants should schedule their application review meeting with the Licensing Coordinator no less than thirty (30) days prior to the date of license and/or permit expiration.

XI. Complaint and Investigation Process

A. Origination of Complaints: Alleged violation of these rules by a licensed secure transportation service or of a secure transportation service operating in the County without a license, may be made in writing by any party and addressed to the Board, or by the Board on its own initiative. Any individual bringing a matter of medical competency to the Board shall waive the right of patient confidentiality as a condition of complaint submission and subsequent investigation. If any legal action is filed against a licensed secure transportation service in a court of the United States, the State of Colorado or any of its political subdivisions, the licensee shall notify the Board within ten (10) business days. A violation of these rules shall not be presumed based on the allegation. In the event that a judgment is entered against the licensee, the licensee shall file a copy of the findings of fact, conclusions of law and order of the court with the Board within ten (10) business days. If an action against a secure transportation service license is undertaken by another jurisdiction, the licensee shall notify the Board within ten (10) business days. A violation of these rules shall not be presumed based on the action. If the action results in a suspension or revocation of the secure transportation service license by another jurisdiction, the licensee shall file a copy of the record of the adverse action with the Board within ten (10) business days.

B. Validation of Complaints: The Board, or its designee, shall complete an initial review of the complaint, judgment or adverse action within five (5) business days to determine if it constitutes a violation of these rules and has sufficient foundation to warrant a complete investigation. Any apparent violation of these rules having sufficient factual basis shall be fully investigated by the Board. Allegations of violations outside the purview of the Board shall be returned to the complainant for referral to the appropriate authority or jurisdiction. The Board shall notify the complainant in writing if the allegation lacks sufficient basis to warrant investigation. The Board shall notify the licensee in writing if a judgment or adverse action filed with the Board does not constitute a violation of these rules.

C. Investigation of Complaints: The Board shall notify the complainant in writing that the allegation is sufficient to warrant a full investigation. Upon initiation of a full investigation, the Board shall notify the secure transportation service of the alleged violation in writing. The Board shall commence action against the secure transportation service or unlicensed secure transportation service if the allegation is determined to be a violation of these rules or, at its discretion, may provide a reasonable period for the licensee to cure any violation or to implement corrective measures to bring the licensee's business activities into conformance with these rules before commencing action to suspend or revoke a license or permit. The Board may forego further hearing or action against the license or permit upon confirmation that the licensee has cured the violation and satisfied any conditions reasonably imposed by the Board. The Board shall notify the complainant in writing if an

investigation determines that the allegation fails to constitute a violation of these rules or that the licensee has cured the violation.

XII. Procedures for Revocation or Suspension

A. The Board may, on its own initiative or upon written complaint made by any party, temporarily suspend, suspend for a definite period, or revoke any license or permit issued pursuant to these rules upon a determination that a violation of these rules by a licensed secure transportation service has occurred.

B. Temporary Suspension: Without prior notice to the licensee and upon determination that a violation that poses immediate threat to the public health, safety and welfare has occurred, the Board may temporarily suspend any license or permit. Such temporary suspension shall be effective upon delivery of written notice to the licensed secure transportation service by the Board. No temporary suspension shall be valid for more than thirty (30) days or until a final decision by the Board concerning suspension or revocation, whichever period is longer. Any written notice of temporary suspension shall also provide notice of the time, date and place of a hearing before the Board to consider the suspension or revocation of the license. Except upon written consent of the licensee, the hearing shall be held not more than ten (10) business days following the effective date of the temporary suspension.

C. Suspension for Definite Period or Revocation of License: Following notice to the licensee and a public hearing at which the licensee shall be afforded an opportunity to be heard, the Board may suspend or revoke any license or permit. Any suspension or revocation shall require a finding by the Board of a violation of these rules based upon the evidence presented at the hearing. Suspension shall be for a specific and definite period of time not to exceed any remaining current license period. The County shall bear the burden of proof of a violation justifying any suspension or revocation of a license or permit. Issuance of a temporary suspension shall not be a prerequisite to the conduct of a hearing to consider the suspension or revocation of a license or permit.

D. Hearings: All suspension or revocation hearings shall be open to the public and shall be conducted in accordance with the Colorado Open Meetings Act. The Board shall be authorized to administer oaths and issue subpoenas to require the attendance of witnesses and the production of papers, books, and records necessary to the determination of any issue at any hearing.

E. Surrender of License or Permit: Following receipt of a written notice of suspension or revocation, the licensee shall surrender and deliver its license and all secure transportation vehicle permits to the Board within forty-eight (48) hours.

F. Notices: Any notice issued pursuant to these rules shall be made in writing and provided to the licensee at the address listed in the application for license. The Board shall use its best efforts to immediately notify in writing any communications center and notify within three (3) business days any first response agencies, local law enforcement agencies and medical facilities of any suspension or revocation. The Board may send notice to other counties, the Colorado Department of Public Health and Environment, Colorado Department of Regulatory Agencies, Colorado Department of Health Care Policy and Financing or other interested parties; provided, however, that such notice shall not entitle these parties to a right to participate in any hearing concerning suspension or revocation of a license.

XIII. Data Collection and Reporting Requirements

Any secure transport resulting in the serious injury, illness or death of a client or staff member during transport or resulting in injury to the client as a result of the use of physical restraint during transport shall be reported to the receiving facility immediately and to the County within twenty-four (24) hours of the incident. The County should be notified by calling or emailing the Licensing Coordinator. Each report shall identify and describe the circumstances leading to the serious injury, illness or death of a client or staff member during transport.

In accordance with Part 6, 6 CCR 1011-4, all secure transportation services in Colorado shall provide the Colorado Department of Public Health and Environment (the "Department") the required data and information in a form and manner determined by the Department as follows:

A. Beginning in 2024, all secure transportation services shall submit the following data no later than March 1 for the previous calendar year:

B. The total number of transports (individual trips and trips with multiple clients as allowed in Part 8.4, 6 CCR 1011-4) that the service's vehicles made for the previous calendar year.

C. The total number of adults (18+) served by the secure transportation service for the previous calendar year.

D. The total number of minors (17 and under) served by the secure transportation service for the previous calendar year.

E. The type of location where individuals were picked up and dropped off for the previous calendar year.

F. The total number of individuals who were transported by the secure transportation service more than one time for the previous calendar year.

G. The total number of transports (individual trips and trips with multiple clients as allowed in in Part 8.4, 6 CCR 1011-4) that the secure transportation service declined due to lack of secure transportation service resources for the previous calendar year.

H. Demographic information for the previous calendar year, including, but not limited to:
   1. The total number of clients served by residential zip code;
   2. The total number of clients served by pickup location zip code; and
   3. The total number of clients served by gender, race and ethnicity.
   4. The total number of clients the service transported who were not on involuntary holds (M1, M5 and M8) for the previous calendar year.

I. The secure transportation service shall complete and submit to the Department a secure transportation service profile in the manner and method determined by the Department. The profile shall include, but not be limited to contact information for the licensee and its owner, manager, and/or administrator, demographics of the service area, number and types of responding staff, number of calls, counties served, organizational type, and number and type of responding vehicles.

   1. Secure transportation services shall update the profile data whenever changes occur and at least annually.

   2. As part of the profile, a licensed ground ambulance agency shall notify the Department if it is providing secure transportation services under its ground ambulance license.

J. The Department may establish procedures to monitor and enforce compliance regarding submission of secure transportation service profile information as described in Section XII.B. above and annual submission of utilization data as described in Section XII.A above.

K. If a secure transportation service fails to comply with the Department's rules, the Department may report this lack of compliance to Archuleta County.

L. The Department may establish procedures to allow outside agencies, institutions, or individuals to obtain information from the secure transportation data system.

M. A secure transportation service may request the annual data that it has submitted to the Department.

XIV. Clinical, Medical and Operating Standards and Procedures

A. Parameters for Secure Transportation: Secure transport clients shall only be transported under the following circumstances:

1. The client is experiencing a behavioral health crisis.

2. The client is in need of urgent transportation to a facility that is defined in part 2.22(C), 6 CCR 1011-4.

3. The client does not and will not need either:
   - Medical treatment during transport, or
   - Active or ongoing medical monitoring.

4. The client does not and will not need to be chemically restrained during secure transport as a behavioral intervention.

B. **Restraint:**

1. No chemical restraint shall be administered during a secure transport. If chemical restraint is needed to ensure client safety, then the client shall receive an ambulance transport.

2. Physical restraint, as defined in Part 2.21, 6 CCR 1011-4, shall only be utilized for health and safety purposes under the following conditions:
   i. In cases of emergency, when the client is at risk of causing serious, probable and imminent threat of bodily harm to themselves or to others and when there is the present ability to affect such bodily harm; and
   ii. After the failure of less restrict alternatives, including verbal de-escalation; or
   iii. After a determination that such alternatives would be inappropriate or ineffective under the circumstances.

3. If physical restraint is utilized during a transport, the service shall document the time at which the physical restraint was applied and removed (if applicable) and the type of physical restraint used.

C. Transportation Procedures:

1. The secure transportation service shall transport one (1) client per vehicle transport, except under the following circumstances:

i. Each client has received behavioral health clearance from the treating provider at the sending facility, no physical restraint is needed, and there is a low probability of behavioral destabilization;
ii. Each client has received medical clearance from the treating provider at the sending facility, is medically stabilized, and has a low probability of medical destabilization;
iii. Each client has received an assessment from the treating provider at the sending facility that the client is an appropriate candidate for a transport with one or more individuals;
iv. The transport is an inter-facility transport as defined at Part 2.22(C), 6 CCR 1011-4; and
v. Each client has given their consent to be transported with another individual.

2. The secure transportation service shall create and maintain accurate and detailed logs of client transports, including professional incident reports.

3. To ensure the needs of clients are met, secure transportation services that do not provide 24/7 services shall provide the client with their after-hours contact information and with contract information for the secure transportation service's back-up providers.

XV. Client Rights

A. Every secure transportation service must have written client rights that assure a client has the right to be treated with consideration, respect, and full recognition of human dignity and individuality, and that includes, at a minimum:

1. The right of the client and their property to be treated with respect.

2. The right of the client to have access to basic comfort items and their personal mobile phone provided the direct client support staff member establishes and documents that those items do not pose a danger to the client or staff member.

3. The right of the client to wear their own clothes provided the direct client support staff member establishes and documents that those items do not pose a danger to the client or staff member.

4. The right of the client to receive secure transportation services by the least restrictive means necessary to assure the safety of the client.

5. The right of the client to be free from discrimination in the provision of services.

6. The right of the client to be free from neglect; financial exploitation; and verbal, physical, and psychological abuse, including humiliation, intimidation, or punishment.

7. For clients who request voluntary transport, the right of the client to discontinue secure transportation services.

8. The right of the client to receive disclosure about any video and/or audio recording that occurs during the delivery of service in accordance with applicable privacy laws.

9. The right of the client to have personally identifying health information protected from unnecessary disclosure.

10. The right of the client or their representative to file a complaint against the secure transportation service with the secure transportation service and County concerning services or care that is or is not furnished and receive documentation of the existence of the investigation and resolution of the complaint, including providing the complainant with the results of the investigation, and the secure transportation service's plan to resolve any identified issues.

11. The right of the client to file a complaint with the secure transportation service and County without fear of discrimination or retaliation by the secure transportation service's owner, manager, administrator or any staff member.

B. Every secure transportation service must have client's rights policies and procedures, that include, at a minimum:

1. Procedures for identifying, reporting, reviewing, and investigating all allegations of abuse, mistreatment, neglect and exploitation.

2. Procedures for timely communicating all investigation results to the client and County in which the secure transportation service is licensed.

3. Procedures for timely and appropriate disciplinary action up to and including termination of staff and appropriate legal recourse against any staff member who has engaged in abuse, mistreatment, neglect or exploitation of a client.

4. Procedures that direct client support staff members must follow, to document their decision to withhold any basic comfort items and/or the client's personal mobile phone or prohibit a client from wearing their own clothes.

XVI. Assignment

Assignment, sale or transfer of a secure transportation service license or vehicle permit is strictly prohibited.

XVII. Fees

Archuleta County charges a non-refundable flat fee for the review and processing of secure transportation services licenses and vehicle permits, as set forth in the Archuleta County Fee Schedule, as amended from time to time.

Payment of the total fee is required at the time of submitting the application(s).