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11 COUNTY OF ALAMEDA; GREGORY J.  
12 AHERN in his official capacity as Sheriff of the  
13 Alameda County Sheriff's Office; KARYN  
14 TRIBBLE in her official capacity as Director of  
the Alameda County Behavioral Health Care  
Services Agency;

15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA/SAN JOSE DIVISION

17 ASHOK BABU, ROBERT BELL,  
18 IBRAHIM KEEGAN-HORNSBY,  
19 DEMAREA JOHNSON, BRANDON  
20 JONES, STEPHANIE NAVARRO,  
ROBERTO SERRANO, and ALEXANDER  
WASHINGTON on behalf of themselves  
and all others similarly situated,

21 Plaintiffs,

22 v.

23 COUNTY OF ALAMEDA; GREGORY J.  
24 AHERN in his official capacity as Sheriff of  
the Alameda County Sheriff's Office;  
25 KARYN TRIBBLE in her official capacity  
as Interim Director of the Alameda County  
26 Behavioral Health Care Services Agency;  
and DOES 1 to 20, inclusive,

27 Defendants.  
28

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Case No. 5:18-cv-07677 NC

**JOINT RESPONSE TO SUMMARY  
ORDER FOLLOWING APRIL 10 STATUS  
HEARING RE: SANTA RITA JAIL  
COVID-19 RESPONSE**

1 Plaintiffs Ashok Babu, Robert Bell, Ibrahim Keegan-Hornesby, Demarea Johnson,  
 2 Brandon Jones, Stephanie Navarro, Roberto Serrano, and Alexander Washington (“Plaintiffs”)  
 3 and Defendants County of Alameda, Gregory J. Ahern, and Karyn Tribble (“Defendants”)  
 4 (collectively, the “Parties”) submit the following joint response to the Court’s Court’s “Summary  
 5 Order Following April 10 Status Hearing Re: Santa Rita Jail COVID-19 Response.” (“Order”)  
 6 (ECF 99.)

7 **JOINT RESPONSE**

8 1. Contact Person for Counsel:

9 Pursuant to the Court’s Order, the parties met and conferred at length and agreed to file a  
 10 document in this case to provide criminal defense attorneys with contact information for  
 11 Wellpath, an exemplar HIPAA-compliant release of information (“ROI”) form, and instructions  
 12 and anticipated turnaround times for Wellpath to process requests for medical records by criminal  
 13 defense attorneys who have clients at Santa Rita Jail. As long as contact visitation is suspended  
 14 for attorneys, ACSO and/or Wellpath staff will provide assistance with getting release forms to  
 15 inmates for signature. Similarly, a contact will be identified for criminal defense attorneys with  
 16 clients at Santa Rita Jail and justice stakeholders to ask criminal case-specific questions related to  
 17 Santa Rita Jail’s COVID-19 response that are not addressed in Santa Rita Jail’s publicly posted  
 18 website, which already contains detailed information with respect to SRJ’s COVID-19 response.  
 19 The parties will work expeditiously to prepare and file this document and agree to file it publicly  
 20 with the court by Monday April 20, 2020.

21 With respect to access to class members’ health records, counsel for the parties to this  
 22 case and non-party Wellpath agreed to meet and confer further and address those requests through  
 23 counsel in this certified class action if appropriate.

24 2. Hospitalization and hospital transfer plans

25 Alameda County Public Health has closely reviewed and approved Santa Rita Jail’s  
 26 COVID-19 Outbreak Control Plan. Alameda County Public Health continues to be involved in  
 27 the Outbreak Control Plan, receives updates as the Plan evolves, provides input if necessary, and  
 28

1 must approve any changes before implementation. This includes interrelated custody policies and  
2 procedures.

3 Wellpath follows CDC’s guidelines regarding COVID-19 testing. Per the CDC, testing  
4 should occur when a patient is experiencing a fever or symptoms of acute respiratory illness (e.g.,  
5 cough, difficulty breathing). More information regarding CDC guidance can be found at  
6 <https://www.cdc.gov/coronavirus/2019-ncov/hcp/clinical-criteria.html> [cdc.gov]

7 At present, all inmates at Santa Rita Jail with either confirmed or suspected COVID-19  
8 (“red patients” per the Outbreak Control Plan) are medically stable and recovering. To date, 13  
9 red patients have completely recovered in custody. Until fully recovered, Santa Rita Jail houses  
10 red patients in either its Outpatient Housing Unit (“OPHU”), which provides a level of medical  
11 care akin to an outpatient medical facility, or in Housing Unit 8 pods A and C. Placement of  
12 inmates in these locations is a medical decision and is not done for any punitive reason, but rather  
13 to medically isolate patients in accordance with CDC guidelines regarding COVID-19. Red  
14 patients are seen twice daily by medical providers to have their vitals taken and be medically  
15 evaluated.

16 For inmates designated as ‘red’ patients (patients with known or suspected COVID-19  
17 who are symptomatic), nurses perform vital signs checks and COVID-19 symptom screens twice  
18 daily, and MDs perform exams once daily, which includes interviewing patients and conducting  
19 physical exams when clinically necessary. For inmates designed as ‘yellow’ patients (patients  
20 with exposure to COVID-19 but asymptomatic), nurses perform temperature checks and COVID-19  
21 symptom screens twice daily, and MDs will examine patients if/when a nurse communicates  
22 concerning findings.

23 To avoid movement through the facility when the need to evaluate a patient with COVID-  
24 19 symptoms arises, patients are evaluated in the sick call room in their respective housing units.  
25 If a patient is symptomatic, he/she masks his/herself before being escorted to the sick call room to  
26 see the nurse.

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1           Should any patient require more acute care than can be provided at Santa Rita Jail, such  
2 patients will be transported via ambulance to local area hospitals, such as Highland Hospital in  
3 Oakland, pursuant to longstanding practice. Depending on the classification of the inmate, at  
4 least one and possibly more deputies will accompany any such patient to the hospital. Because  
5 Santa Rita Jail is employing a mandatory overtime policy, at present Alameda County Sheriff's  
6 Office is capable of properly staffing such hospital runs, if necessary. Moreover, although urgent  
7 off-site appointments remain on the schedule, most routine and elective medical appointments  
8 have been postponed or rescheduled in light of the COVID-19 pandemic and the risks associated  
9 with unnecessary exposure. Due to this reduction in the number of medical transports as well as  
10 the reduction in Santa Rita's population, Alameda County Sheriff's Office does not anticipate any  
11 issues with respect to staffing hospital runs.

12           Further, Alameda County Public Health reports that there is presently no shortage of  
13 hospital beds in the community for COVID-19 patients, nor does Alameda County Public Health  
14 anticipate a shortage of such beds in the near future.

15           3.       Phone and Video Calls

16           The parties met and conferred further and agreed that during the suspension of in-person  
17 visitation during the pandemic, Alameda County will provide every inmate three free 15-minute  
18 telephone calls and one free 15-minute video call per week. For the Court's information, for the  
19 week of April 5, inmates completed calls totaling 424,188 minutes. This equates to 7,000 hours  
20 of calls, or approximately 3.5 hours of calls per inmate per week.

21           4.       Tablets

22           Inmates can make phone calls to anyone, including attorneys, from GTL phones in  
23 common areas in addition to tablets (if they have them). As indicated on Alameda County  
24 Sheriff's Office's COVID-19 website, Attorneys should submit an email request to  
25 [prolist@acgov.org](mailto:prolist@acgov.org) for more information regarding this program and to register their phone  
26 numbers.

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1 Recently, at Adult Forensic Behavioral Health’s request, GTL, the jail’s telecom provider,  
 2 added two free mental wellness applications: “Calm” and “PTSD Coach.” Further, a free version  
 3 of the game solitaire has been added to all tablets.

4 The current schedule for tablet deployment is as follows:

5

6 **Inmate Tablets**

Housing Unit	Date Live	Projected Live Date
1		04/15/20
2		04/15/20
3	04/01/20	xxxx
4	04/02/20	xxxx
6	04/07/20	xxxx
7	04/09/20	xxxx
8	04/13/20	xxxx
9	03/31/20	xxxx
21	04/01/19	xxxx
22		week of 04-19-20
23		week of 04-19-20
24	04/01/19	xxxx
25		week of 04-19-20
31		week of 05-04-20
32		week of 05-04-20
33		week of 05-04-20
34		week of 05-04-20
35		week of 05-04-20
OPHU		4/16/2020

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22 **5. Telemedicine**

23 The parties met and conferred regarding telemedicine. While Wellpath continues to  
 24 explore the possibility of increasing its use of telemedicine during the pandemic, no operational  
 25 or policy changes have yet been implemented and are not immediately anticipated. Wellpath and  
 26 Alameda County Sheriff’s Office continue to discuss Wellpath’s potential use of telemedicine  
 27 during the pandemic and will advise Plaintiffs’ counsel of any changes.

1 Adult Forensic Behavioral Health (“AFBH”) clinicians are still going into non-  
 2 quarantined housing units to see clients. AFBH’s prescribing staff (MDs, NPs and PharmD) have  
 3 been utilizing the laptops to provide Telepsychiatry since April 2. AFBH is currently looking at  
 4 expanding the Telehealth so that the prescribing staff and the clinicians can see clients  
 5 simultaneously. This will allow AFBH to continue to provide comprehensive services while  
 6 minimizing risk of infection to staff and clients, and minimizing the risk of losing staff to  
 7 infection. Prescribing staff working remotely are still handling daily tasks, and coordinating care  
 8 with on-site staff as usual.

9 AFBH continues to have increased staffing in the Intake, Transfer and Release area of  
 10 Santa Rita Jail to evaluate clients as they enter the jail, and get them immediately assessed and  
 11 services in place. AFBH also continues to have an on-site physician to handle emergencies and  
 12 on-site work, Monday through Saturday. AFBH continues to have on-call physicians, seven days  
 13 per week, including after working hours.

14 6. Out-of-Cell Time

15 The parties met and conferred and Defendants have agreed to a reporting process in  
 16 connection with ongoing settlement negotiations. While out-of-cell time is necessarily more  
 17 limited for inmates who are medically isolated as a result of COVID-19, inmates at Santa Rita Jail  
 18 are receiving out-of-cell time in excess of the minima imposed by Title 15.

19 7. Miscellaneous Issues

20 To augment the information posted on Alameda County Sheriff’s Office’s public COVID-  
 21 19 website and to clarify some of the issues and concerns raised in court last week, the following  
 22 updates are provided:

23 a. Masks:

24 Over the weekend of March 28, every inmate at Santa Rita Jail was offered a mask. Not  
 25 every inmate accepted. On Friday, April 10, each housing unit was delivered a box of masks for  
 26 distribution to the inmates. Every inmate at Santa Rita Jail was provided a face mask, regardless  
 27 of whether they wanted one or not. The masks have “100% virgin spunbonded and pleated  
 28 polypropylene non-linting outer layers” and a “polyethylene microporous middle layer.”

1 Arrestees brought to Santa Rita Jail are provided a face mask prior to entering the jail. At  
2 present Santa Rita Jail does not anticipate a shortage of face masks and has sufficient stock to  
3 replace inmate face masks that are soiled or no longer fit properly.

4 Deputies and ACSO staff who work at Santa Rita Jail are required to wear masks  
5 whenever they are within six feet of an inmate or another staff member. Deputies can remove  
6 their masks if they are in an isolated area or can practice safe social distancing.

7 b. Cleaning

8 Santa Rita Jail has dramatically increased cleaning efforts in response to the pandemic.  
9 With respect to general population living areas, each housing unit's common areas, including the  
10 pods and dayrooms, are cleaned by inmate workers twice per day, including before  
11 meal/recreation time and at the conclusion of meal/recreation time. Inmates are also offered  
12 cleaning supplies twice per day to clean their individual inmate cells and/or living areas (e.g.  
13 dormitory). With respect to living areas with higher classification inmates and the living areas  
14 occupied by red inmates, these areas are cleaned by inmates during their recreation time.

15 Before or after recreation and meal times, deputies enter pods and spray down all high  
16 touch surfaces, tables, and the floor, with a bleach solution. Inmate pod workers wipe down  
17 surfaces and squeegee the floor. In HU8, pods A and C, inmate workers do not wipe down  
18 surfaces, as these areas are inhabited by red inmates. Instead, deputies spray the common areas  
19 down between individual inmate recreations and wait for the cleaning agents to dry before letting  
20 the next inmate out for recreation time. This is also the case in HU8B, which houses yellow  
21 inmates with a known significant exposure to a COVID-positive person. The bleach solution is  
22 not provided to the inmates to dispense due to the toxicity of the solution. When the inmates  
23 clean their cells they are given a toilet brush, a non-bleach CDC-approved disinfectant cleaning  
24 solution, and towels. Supervisors confirm that such cleaning takes place.

25 c. Inhalers:

26 A question was raised during a previous hearing with respect to an alleged report that  
27 inmates in the Santa Rita Jail must share the metered dispenser for albuterol. This practice was  
28 discontinued weeks ago due to the pandemic.

1 d. Kitchen Cleaning:

2 A question regarding kitchen sanitation was raised during a recent hearing. A non-party  
3 to this case, Aramark, runs the kitchen. Santa Rita Jail's most recent public health report noted  
4 no significant deficiencies in the kitchen and significant improvement over the prior year. With  
5 respect to the concerns recently raised, Aramark advises that every hand sink in the kitchen has  
6 antibacterial soap and two towel dispensers and every bathroom for kitchen workers has  
7 antibacterial soap available. Thousands of single-use vinyl gloves are available for use with  
8 thousands more scheduled to arrive, and inmates are instructed to change gloves between tasks.  
9 The kitchen is cleaned on an ongoing basis Monday through Friday, including ensuring that the  
10 sinks are always stocked with soap and paper towels.

11 e. Special Handling Units

12 The following housing units are "Special Handling Units" during the pandemic in the  
13 sense that inmate in these units recreate alone and eat meals alone (Please note that this list is  
14 subject to change):

15 HU 1 (ABCDE pods) - Some inmates within this pod recreate in groups but are housed  
16 alone; some recreate alone based on classification.

17 HU 1 (F pod) - All inmates recreate alone based on classification.

18 HU 2 (ABDEF pods) - Some inmates within this pod recreate in groups but are housed  
19 alone ; others recreate alone based on classification.

20 HU 8 (D,E,F pods) - Some inmates within this pod recreate in groups but are housed  
21 alone; others recreate alone based on classification.

22 HU 8 (A pod) – These inmates are celled and recreate alone for purposes of medical  
23 isolation due to Wellpath medical assessment as red patients.

24 HU 8 (B pod) – These inmates recreate alone for purposes of medical isolation due to  
25 Wellpath medical assessment as being yellow patients with a known significant exposure to a  
26 COVID-positive person.

27 HU 8 (C pod) – These inmates recreate alone for purposes of medical isolation due to  
28 Wellpath medical assessment as COVID-positive patients.



1 HU 21 (B pod) – These inmates recreate alone due to the fact they are female new books  
2 on a 5-day quarantine.

3 HU 23 – All inmates recreate alone due to the fact they are all male new books on a 5-day  
4 quarantine and of mixed classification.

5 HU 24 (F pod) - Some inmates within this pod recreate alone; others recreate in groups  
6 based on classification.

7 f. Protocol for Releasing Inmates from Medical Isolation

8 COVID-positive inmates remain in medical isolation in accordance with Centers for  
9 Disease Control and Prevention’s (CDC) “Interim Guidance on Management of Coronavirus  
10 Disease 2019 (COVID-19) in Correctional and Detention Facilities” (“Interim Guidance”) until  
11 certain criteria have been met, explained further below, after which time they are cleared by  
12 Wellpath to return back to their original housing unit.

13 Per the CDC’s Interim Guidance, facilities may release formerly COVID-positive inmates  
14 from medical isolation using either testing criteria or non-testing criteria. The CDC’s Interim  
15 Guidance does not recommend either the testing or non-testing protocol, but rather, provides  
16 guidance and procedures for both. Wellpath adheres to the non-testing protocol. CDC’s Interim  
17 Guidance for the non-testing protocol provides that formerly COVID-positive inmates may be  
18 released from medical isolation *only if* the individual has been free from fever for at least 72  
19 hours without the use of fever-reducing medications AND the individual’s other symptoms have  
20 improved (e.g., cough, shortness of breath) AND at least 7 days have passed since the first  
21 symptoms appeared. (See CDC Interim Guidance, p. 17, available at

22 <https://www.cdc.gov/coronavirus/2019-ncov/downloads/guidance-correctional-detention.pdf>)

23 Wellpath adheres to these recommendations and, in fact, has recently put in place a more  
24 stringent protocol which requires the patient to be free from COVID symptoms for five days.

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1 **PLAINTIFFS' SEPARATE STATEMENT**

2 Unlike last week when it appeared COVID-19 cases were increasing exponentially, at this time,  
3 Santa Rita Jail does not appear to be seeing a continued surge in new cases. This can change  
4 quickly at any time. It is critical that Defendants continue to plan for an up-surge while also  
5 continuing ongoing efforts around screening, testing, sanitation of facilities, and all steps that can  
6 be taken to increase social distancing as much as possible. Proper social distancing is not  
7 possible in a jail environment, and the number of people coming in and out of the Jail on a daily  
8 basis will continue to introduce a risk of new infections. Even with these efforts, the ongoing  
9 pandemic will continue to pose significant risks to class members housed in the Jail. We address  
10 three areas of continued concern below.

11 **Ongoing Need for Further Population Reductions.** Given the ongoing risk of serious  
12 harm that the pandemic poses to both inmates and staff, the Sheriff should use his authority  
13 pursuant to California Government Code Section 8658 to release additional inmates and further  
14 reduce the population. On April 14, 2020, the Chief of the Division of Law Enforcement for the  
15 California Department of Justice issued on a memo to all County Sheriffs and Probation Officers  
16 reminding them of their authority to release inmates and making clear that Government Code  
17 Section 8658 applies to the COVID-19 pandemic. The Sheriff should use this statute to protect  
18 the health and safety of both inmates and staff at the Jail, as well as to prevent the community  
19 hospitals from dealing with any jail-generated surge.

20 **Role of County Public Health.** The Court's April 10, 2020 Order, Dkt. 99, instructed the  
21 parties to discuss hospitalizations and hospital transfer plans to "include the Alameda County  
22 Public Health Department, county hospitals, and Wellpath in this discussion as needed." The  
23 parties met and conferred regarding these issues on Tuesday April, 14, 2020. Following that  
24 meeting we sent the following questions for the Public Health Department to answer via email but  
25 have not yet received a response. Plaintiffs request that the Court order the parties to continue to  
26 meet and confer on these issues and in particular for the County Public Health Department to  
27 provide responses to the items listed below as part of those ongoing meet and confers.  
28

1       **Staffing.** Are you satisfied with the level of staffing and the care being provided by WellPath  
2       during the Pandemic? If you have any concerns, we would appreciate at least a high level  
3       briefing on the nature of your concerns.

4       **Oversight.** What if any steps are you taking proactively to monitor the conditions at Santa  
5       Rita? Is this a regular part of the oversight you usually provide or specific to the  
6       pandemic? Have you made suggestions that were implemented?

7       **Hospitalization.** Are you satisfied that the people in the jail will have access to hospitals  
8       timely if there is a need for anyone with Covid symptoms who needs  
9       hospitalization? Have you reviewed and approved any specific contingency plans for this  
10      occurrence? Are jail inmates enrolled in MediCal under the ACA so that inpatient hospital  
11      stays can be covered with federal funds?

12      **Testing.** Are you satisfied with the quality and number of tests being administered to people  
13      who are incarcerated or working at Santa Rita?

14      **Other Recommendations.** Have you made other recommendations for treatment during this  
15      pandemic that you would like to be followed by the jail that have so far not been  
16      implemented?

17      **Testing.** As of April 15, 2020, the Jail has tested 77 people total. Even given the current  
18      reduced population of 1801, this amounts to only 0.04% of the population incarcerated in the jail.  
19      Given the significant risk posed by COVID-19 it is difficult to understand why a higher  
20      percentage of inmates and staff are not being tested. Plaintiffs ask that the Court order the Parties  
21      to meet and confer around the issue of testing and that Defendants explain why the number of  
22      people being tested has not been increased.

23      **DEFENDANTS' SEPARATE STATEMENT**

24      Defendants continue to work around the clock to address the COVID-19 pandemic.  
25      Defendants' response to date has been aggressive, effective, and thoughtful. Defendants continue  
26      to work collaboratively with Wellpath and Alameda County Department of Public Health  
27      ("Public Health") to ensure all appropriate steps are taken to prevent and slow the spread of the  
28      novel coronavirus. To that end, and as demonstrated in the joint statement above, Defendants  
29      have taken significant steps to ensure that those entering the jail – including inmates and staff –  
30      are properly screened, facilities are regularly and thoroughly disinfected, and strategies are  
31      implemented to ensure social distancing among inmates to the greatest extent possible. Further,  
32      Defendants continue to identify and implement additional measures in real time and in response  
33      to this rapidly-evolving pandemic.

1 Finally, Public Health received Plaintiffs’ questions on the evening of Tuesday, April 14.  
2 While Public Health is working around the clock to address the COVID-19 pandemic, and  
3 although this case does not allege deficiencies with respect to the delivery of medical care, county  
4 counsel is working with Public Health to provide responses to Plaintiffs’ questions in a timely  
5 manner. Defendants continue to meet and confer with Plaintiffs in this regard.

6 **Population Reductions**

7 The Sheriff’s Office will continue to cooperate with state and federal justice stakeholders  
8 and will release inmates as ordered. As detailed in our filings in this court, Santa Rita Jail is at  
9 the forefront of correctional institutions nationwide with regard to facing the COVID-19  
10 pandemic. While the Sheriff’s Office will continue to work with justice stakeholders to safely  
11 reduce the jail’s population as to those inmates who are not in custody for serious and violent  
12 felonies, out of concern for public safety, the Sheriff respectfully declines to invoke California  
13 Government Code Section 8658.

14 **Testing**

15 As stated above, Defendants and their medical provider, Wellpath, adhere to Centers for  
16 Disease Control and Prevention’s (CDC) “Interim Guidance on Management of Coronavirus  
17 Disease 2019 (COVID-19) in Correctional and Detention Facilities” (“Interim Guidance”)  
18 pertaining to testing for COVID-19. Plaintiffs’ request to increase testing without a demonstrable  
19 need is not warranted and runs contrary to current CDC guidelines. When an inmate presents  
20 with symptoms consistent with COVID-19, that inmate is immediately isolated and tested.

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1 If testing confirms the inmate is COVID-positive, he or she will remain in medical isolation in  
2 accordance with the CDC’s Interim Guidance until the inmate is cleared by Wellpath to return to  
3 his or her original housing unit.

4 Dated: April 16, 2020 ROSEN BIEN GALVAN & GRUNFELD LLP

6 By: /s/ Kara Janssen  
7 Jeffrey L. Bornstein  
8 Ernest Galvan  
9 Kara J. Janssen  
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10 Dated: April 16, 2020 BURKE, WILLIAMS & SORENSEN, LLP

12 By: /s/ Gregory B. Thomas  
13 Gregory B. Thomas  
14 Temitayo O. Peters  
Attorneys for Defendants

15 Dated: April 16, 2020 HANSON BRIDGETT LLP

17 By: /s/ Paul B. Mello  
18 Paul B. Mello  
19 Samantha D. Wolff  
Attorneys for Defendants

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