Population Health Management for Behavioral Health Organizations

Indiana Council

May 2015
My Background

• Medicaid Director
• Previously DMH Medical Director – 20 years Practicing Psychiatrist
  CMHCs – 10 years
  FQHC – 18 years
• Distinguished Professor, Missouri Institute of Mental Health, University of Missouri St. Louis
• Adjunct Professor of Psychiatry – University of Missouri Columbia
Celebrity Endorsements

• "He is not only dull himself, he is the cause of dullness in others." - Samuel Johnson

• "He uses statistics as a drunken man uses lamp-posts... for support rather than illumination." -- Andrew Lang

• "He can compress the most words into the smallest idea of any man I know." -- Abraham Lincoln
Outline

• What Is Population health
• What is population health management
• Why do we need it
  – Good outcomes are dependent on patient behaviors
  – SMI are sicker
  – Psychiatry shortage
• Health home example
Population Health Definitions

• The health of the population as measured by health status indicators and as influenced by social, economic and physical environments, personal health practices, individual capacity and coping skills, human biology, early childhood development, and health services. (Dunn and Hayes, 1999)

• A conceptual framework for thinking about why some populations are healthier than others as well as the policy development, research agenda, and resource allocation that flow from it (Young 2005)
Factors that Affect Health

- Counseling & Education
- Clinical Interventions
- Long-lasting Protective Interventions
  - Changing the Context to make individuals’ default decisions healthy
- Socioeconomic Factors

Examples:
- Eat healthy, be physically active
- Rx for high blood pressure, high cholesterol, diabetes
- Immunizations, brief intervention, cessation treatment, colonoscopy
- Fluoridation, 0g trans fat, iodization, smoking free laws, tobacco
- Poverty, education, housing, inequality
Health Rankings

America’s Health Rankings – A Call to Action for People & Their Communities
United Health Foundation, 2007
The IHI Triple Aim

Better Care for Individuals, Better Health for Populations, and Lower Per Capita Costs
The Continuum of Care

- **HEALTHY**
  - Health promotion
  - Biometric screening
  - Workplace Wellness
  - Prevention
  - Health risk assessment

- **AT RISK**
  - HIT solutions
  - Care Coordination
  - Physician Collaborations
  - Patient Advocacy

- **CHRONIC**
  - Intensive case management
  - Mobile health
  - Data analytics

- **COMPLEX**
  - Chronic Condition Management
  - Palliative care
How do you deliver PHM in any Care Setting?

Assess

Stratify

Implement Solutions

Measure & Report
Population Management Principles

- Population-based Care
- Data-Driven Care
- Evidence-based Care
- Patient Centered Care
- Addressing Social Determinates of Health
- Team Care
- Integration of Behavioral and Primary Care
Population-Based Care

• Don't rely solely on patients to know when they need care and what care to ask for from whom - Use data analytics to outreach to on high need/high utilizer patients

• Don't focus on fixing all care gaps one patient at a time - Choose selected high prevalence and highly actionable individual care gaps for intervention across the whole population

• The population-based health care provider is the public health agency for their clinic population
Data-Driven Care

- Patient Registries
- Risk Stratification
- Predictive Analytics
- Performance Benchmarking
- Data Sharing
Population Management

• Selects those from whole population:
  – Most immediate risk
  – Most Actionable improvement opportunities

• Aids in planning:
  – Care for whole population
  – New Interventions and Programs
  – Early identification and Prevention
  – Choosing and Targeting Health Education
Data Uses

• Aggregate Reporting – performance benchmarking
• Individual drill down – care coordination
• Disease Registry – care management
  – Identify Care Gaps
  – Generate to-do lists for action
• Enrollment Registry – deploying data and payments
• Understanding – planning and operations
• Telling your story – presentation like this
Principles

- Use the Data you have before collecting more
- Show as much data as you can to as many partners as you can as often as you can
  - Sunshine improves data quality
  - They may use it to make better decisions
  - It’s better to debate data than speculative anecdotes
- When showing data ask partners what they think it means
- Treat all criticisms that results are inaccurate or mis-leading as testable hypotheses
More Principles

- Tell your data people that you want the quick easy data runs first. Getting 80% of your request in 1 week is better than 100% in 6 weeks
- Treat all data runs as initial rough results
- Important questions should use more than one analytic approach
- Several medium Data Analytic vendors/sources is better than on big one
- Transparent Bench Marking improves attention and increases involvement
Most Important Principle

- Perfect is the Enemy of Good
- Use an Incremental Strategy
- If you try figure out a comprehensive plan first you will never get started
- Apologizing for a failed prompt attempt is better than is better than apologizing for missed opportunity
PLANNING

Much work remains to be done before we can announce our total failure to make any progress.
Six Population Health Management Services

• Care Management
• Care Coordination
• Managing Transitions of Care
• Health Promotion
• Individual and Family Support
• Referral to Community Services
Comprehensive Care Management

- Identification and targeting of high-risk individuals
- Monitoring of health status and adherence
- Identification and targeting care gaps
- Individualized planning with the patient
Step 1 – Create Disease Registry

• Get Historic Diagnosis from Admin Claims

• Get Clinical Values from Metabolic Screening, clinical evaluation and management, care plans

• Combine into EHR Disease Registry (Central Data Registry, PROACT)

• Online Access available to all Providers
Step 2 – Identify Care Gaps and ACT!

- Compare Combined Disease Registry Data to accepted Clinical Quality Indicators
- Identify Care Gaps
- Sort patients groups with care gaps into agency specific To-Do lists
- Nurse care manager helps team decide who will act
- Set up indicated visits and pass on info with request to treat
Care Coordination

• Coordinating with the patients, caregivers and providers
• Implementing plan of care with treatment team
• Planning hospital discharge
• Scheduling
• Communicating with collaterals
Allowable Uses - TPO

Core Health Care Activities for which health information can be used/shared with or without patient consent under HIPAA to avoid unnecessary interference with access to quality health care:

• Treatment
• Payment
• Healthcare Operations
Treatment (45 CFR 164.5010)

- **Treatment** means the provision, coordination, or management of health care and related services by one or more health care providers, including:
  - coordination or management of health care by a health care provider with a third party;
  - consultation between health care providers relating to a patient; or
  - referral of a patient for health care from one health care provider to another.
Treatment

• Authorizations are not needed to use or disclose Personal Health Information (PHI) for treatment purposes.

• Treatment, by design, is broadly defined.

• Treatment covers the coordination or management of health care among providers or a third party “related service”.

Treatment

• Treatment includes not just health care, but, also, “related services.”

• “Related services” can include social, rehabilitative or other services associated with health care.

• HHS believes disclosures for treatment purposes are appropriate for timely and quality treatment.
The following, when undertaken on behalf of a single consumer (not a population) are treatment activities:

- Case management;
- Care coordination;
- Disease management;
- Health promotion; and
- Outreach programs
Surprising Truth about Treatment, Health Care Operations, and Payment

• Individuals have the right to request restrictions on how a covered entity will use and disclose PHI about them for treatment, health care operations, and payment.

• **A covered entity is not required to agree to an individual’s request for restriction, but is bound by any restrictions to which it agrees. (45 CFR 164.522(a))**
A word about “Liability”

• Both 42 CFR Part 2 and HIPAA are frequently interpreted in an unnecessarily restrictive manner by Privacy Officers and Organizations General Counsel

• An Important Distinction for CEOs
  – Courts give Orders
  – Your lawyers give Advice

• CEOs must manage and balance many types of liability
  – Financial - Legal - Operational
  – Clinical - Public Relations
Why Behavioral Health Needs Population Management

– ACA Requires It
– SMI are sicker
– Population Management needs BH
– Psychiatry shortage
Healthcare Reform
Moving Toward an Accountable Health Care System

Coverage for All

Payment Reform
Align incentives
Pay for Value
Strengthen Primary Care

Improve Quality and Support Innovation

Tools to Rebuild and Restructure Health Care
Population Health Management in the ACA

- Community Health Needs Assessment requirements
- Expansion of prevention and wellness services
- Hospital Readmissions Reduction Program
- Community-based Care Transitions Program
- Accountable Care Organizations
- Patient Centered Medical Homes
- Health Homes for Chronic Conditions
- Increased funding for health centers
A Quick Overview of Assumption of Risk Models

Model 1: Typical Self-Insured Employer

Purchaser: Employer - Risk Stays Here

Payer: Intermediary/TPA

Billing Provider: Provider/Network/System

Health Care Worker: Practitioner/Employees
A Quick Overview of Assumption of Risk Models

Model 2: Typical Uninsured

Purchaser: Patient - Risk Stays Here

Payer: None

Billing Provider: None

Health Care Worker: Practitioner/Employees
A Quick Overview of Assumption of Risk Models

Model 3: **Typical Insurance**

- **Purchaser**: Employer/Taxpayer/Individual
- **Payer**: Insurance Company
- **Billing Provider**: Provider/Network/System
- **Health Care Worker**: Practitioner/Employees
A Quick Overview of Assumption of Risk Models

Model 4: Accountable Care/Shared Savings

**Purchaser:** Employer/Taxpayer/Individual

**Payer:** Intermediary/TPA (If needed)

**Billing Provider:** Provider/Network/System

**Health Care Worker:** Practitioner/Employees

(Risk)
A Quick Overview of Assumption of Risk Models

Model 5: **Typical** HMO (Provider Side)

**Purchaser:** Employer/Taxpayer/Individual

↓

(Risk)

↓

**Payer:** Intermediary/TPA (If needed)

↓

(Risk)

↓

**Provider:** Provider Network/HMO

↓

(Risk)

↓

**Health Care Worker:** Practitioner/Employees
A Quick Overview of Assumption of Risk Models

Averill, Richard F. MS; Goldfield, Norbert I. MD; Vertrees, James C. PhD; McCullough, Elizabeth C. MS; Fuller, Richard L. MS; Eisenhandler, Jon PhD. Achieving Cost Control, Care Coordination, and Quality Improvement Through Incremental Payment System Reform. Journal of Ambulatory Care Management: January/March 2010 - Volume 33 - Issue 1 - p 2–23
View of Risk Distribution – FFS

Global Need for Comprehensive Medication Management

Typical Focus in Traditional Fee for Service System without Value-Driven Service Provision
View of Risk Distribution – ACO

Global Need for Comprehensive Medication Management

Typical focus of Intervention based on Patient Need/Response
Risk Time Horizon

Population Risk

Return on Intervention Investment in Years 6-80
(e.g. Vaccines, Well Child Visits)

Return on Intervention Investment in Year 2-5
(e.g. Care Gaps)

Return on Intervention Investment in Year 1
(e.g. Transitional Care)

Quality of Care Efforts

Cost Savings Efforts
Intrinsic Risk vs. Modifiable Risk

Strata 1
("Healthy")

Strata 2
("Pre-Sick")

Strata 3
("Sick")

Strata 4
("Very Sick")
Intrinsic Risk vs. Modifiable Risk

- Strata 1: "Healthy"
- Strata 2: "Pre-Sick"
- Strata 3: "Sick"
- Strata 4: "Very Sick"
Intrinsic Risk vs. Modifiable Risk

Strata 1
(“Healthy”)

Strata 2
(“Pre-Sick”)

Strata 3
(“Sick”)

Strata 4
(“Very Sick”)

Patients in a Higher Utilization Strata than Their Inherent Risk
...from encounters...to ongoing management

Fee-For-Service

Pre-Encounter | Encounter | Post-Encounter | Disengaged
--- | --- | --- | ---
X | $$$$$$ | X | X

Population Management

Pre-Encounter | Encounter | Post-Encounter | Disengaged
--- | --- | --- | ---
$ | $ | $ | $
Important Provider Competencies

Care Coordination

Care Management

Clinical Integration

Characteristics:
- Outcomes-oriented
- Enabled by technology
- Patient-centered
- Use of data and analytics
- Performance transparency
- Ability to partner across organizations
Life Expectancy


Comparison of Metabolic Syndrome Prevalence in Fasting CATIE Subjects and Matched NHANES III Subjects

<table>
<thead>
<tr>
<th></th>
<th>Males</th>
<th>Females</th>
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<tbody>
<tr>
<td></td>
<td>CATIE N=509</td>
<td>NHANES N=509</td>
</tr>
<tr>
<td>Metabolic Syndrome Prevalence</td>
<td>36.0%</td>
<td>19.7%</td>
</tr>
<tr>
<td>Waist Circumference Criterion</td>
<td>35.5%</td>
<td>24.8%</td>
</tr>
<tr>
<td>Triglyceride Criterion</td>
<td>50.7%</td>
<td>32.1%</td>
</tr>
<tr>
<td>HDL Criterion</td>
<td>48.9%</td>
<td>31.9%</td>
</tr>
<tr>
<td>BP Criterion</td>
<td>47.2%</td>
<td>31.1%</td>
</tr>
<tr>
<td>Glucose Criterion</td>
<td>14.1%</td>
<td>14.2%</td>
</tr>
</tbody>
</table>

Meyer et al., Presented at APA annual meeting, May 21-26, 2005.
At baseline investigators found that:

- **88.0%** of subjects who had dyslipidemia
- **62.4%** of subjects who had hypertension
- **30.2%** of subjects who had diabetes

were **NOT** receiving treatment.
Causes of Excess Mortality

• Smoking
• Obesity
• Inactivity
• Polypharmacy
• Under Diagnosis of Medical Conditions
• Inadequate Treatment of Medical Conditions
Per Member Per Month Costs

Private Sector

- No Mental Disorder: $300
- Any Mental Disorder: $1,100

Medicare

- No Mental Disorder: $800
- Any Mental Disorder: $1,400

Medicaid

- No Mental Disorder: $600
- Any Mental Disorder: $1,200

Melek et al. Milliman Inc, 2013
MH/SU costs in NY State’s Medicaid Program

- MH Disorder
- SU Disorder
- No MH/SU Disorder

Behavioral Health costs
Physical Health costs
Determinants of Health

Proportional Contribution to Premature Death

- Genetic predisposition: 30%
- Social circumstances: 15%
- Environmental exposure: 5%
- Health care: 10%
- Behavioral patterns: 40%

Determinants of Health and their Contribution to Premature Death, Adapted from McGinnis, et al., 2002
Drivers of Increased Demand

• Increased Coverage
  – Wellstone Domenici Parity Act
  – ACA

• Increased Demand
  – Stigma continues to drop releasing pent up demand
  – Press coverage of mass shootings - increasing mental health services is more popular than gun control

• Focus of High Utilizers

• Increased desire for integration by payers

• Shrinking Psychiatric Workforce
What is a Health Home?

• Not just a Medicaid Benefit
• Not just a Program or a Team
• A System and Organizational Transformation
Population Based

- Payments for HH services will be paid PMPM, not unit by unit
- Service needs will be identified by patient health history and status
- Outcomes will be measured by groups of clients (i.e., by organization, region, medication used, co-morbid conditions)
Health Care Home Strategy

• Case management coordination and facilitation of healthcare

• Primary Care Nurse Care Managers

• Disease management for persons with complex chronic medical conditions, SMI, or both

• Behavioral Health management and behavior modification as related to chronic disease management for persons with Medical Illness

• Preventive healthcare screening and monitoring by MH providers

• Integrated Primary Care and Behavioral Healthcare
Health Home Strategy

- Health technology is utilized to support the service system.
- “Care Coordination” is best provided by a local community-based provider.
- MH Community Support Workers who are most familiar with the consumer provide care coordination at the local level.
- Primary Care Nurse Care Managers working within each Health Home provide system support.
- Behavioral Health Consultants in each Primary Care Health Home
- Statewide coordination and training support the network of Health Homes.
What is Different about Health Homes?

- Individual Practitioner
- Episodic Care
- Focus on Presenting Problem
- Referral to meet other Needs
- Managed Care
  - Manages access to care
  - Does not change clinical practice

- Integrated Primary/Behavioral Health Care Team
- Continuous Care
- Comprehensive Care Management
  - Coordinates care across the healthcare system
  - Data driven population management
  - Transforms clinical practice
  - Emphasizes healthy lifestyles and self-management of chronic health problems
Health Home

Target Populations

• Patients with Diabetes
  – At risk for cardiovascular disease and a BMI > 25
• Patients who have two of the following
  – COPD/Asthma
  – Diabetes (also as single condition)
  – Cardiovascular Disease
  – BMI>25
  – Developmental Disabilities
  – Use Tobacco

• Individuals with a serious mental illness; or with other behavioral health problems who also have
  – Diabetes
  – COPD/Asthma
  – Cardiovascular Disease
  – BMI>25
  – Developmental Disabilities
  – Use Tobacco

Primary Care Health Homes
CMHC Healthcare Homes
Missouri’s Health Homes

• Providers
  – 18 FQHCs
    • 67 Clinics
  – 6 Hospitals
    • 22 Clinics
    • 14 Rural Health Clinics

• Enrollment
  – 15,526 adults
  – 428 children
  – 15,954 total

• Providers
  – 28 CMHCs
    • 120 Clinics/Outreach Offices

• Enrollment
  – 16,611 adults
  – 2,387 children
  – 18,998 total

Primary Care Health Homes

CMHC Healthcare Homes
Health Home Team

– Nurse Care Managers (1FTE/250pts)
– Care Coordinators (1FTE/500pts)
– Health Home Director
– Behavioral Health Consultants (primary care)
– Primary Care Physician Consultant (behavioral health)
– Learning Collaborative training
– Next day notification of Hospital Admissions
Six CMS Required Health Home Functions

- Care Management
- Care Coordination
- Managing Transitions of Care
- Health Promotion
- Individual and Family Support
- Referral to Community Services
HCH Responsibilities

Hospital Admissions

• The importance of following up on hospital discharges

• A joint letter prepared by the Mo Hospital Association and Mo HealthNet was distributed to all hospitals describing the Health Home initiative and encouraging hospital cooperation.

• A draft Memorandum of Understanding has been distributed to your CMHC administration to use as a guide in developing an MOU with hospitals serving your area.
HCH Responsibilities

Hospital Admissions

- Hospitals are required by most payers, including Missouri Medicaid, to contact the payer at the time of admission to receive an Initial Authorization of Stay.
- All-new authorizations for inpatient care are sent in an overnight flat file data transfer from the Inpatient Authorization Unit to the Health Home analytics unit.
- An access database is used to automatically sort the patients by health home and generate an automated email listing those patients with new authorizations to each Health Home Director.
- HCHs receive daily e-mails regarding hospital admissions.
HCH Responsibilities

Hospital Admissions

- HCH members discharged from the hospital must have a contact within 72 hours of discharge
  - This contact may be made by the individual’s CSS, case manager, or NCM
- Nurse Care Managers must complete a medication reconciliation on HCH members discharged from the hospital
  - Information regarding the enrollees medications may be collected by the individual’s CSS or case manager for review by the NCM
Hospital Admissions

Following Up is Complicated

• False Positives and Missing Data
  – Late notification
  – Appealing denials
  – Dual Eligibles

• Working with multiple hospitals
  – Barnes Hospital had admissions from half of the HCHs
  – Pathways had admissions to 38 hospitals in one month
  – BJC and Crider had admissions to 17 hospitals in one month
Emergency Room Visits

• In response to the anthrax scare following 9/11 all emergency rooms were required to send a notification of every emergency room visit to the state health department
• All new ER visit notifications are sent in an overnight flat file data transfer from the State Health Department to the Health Home analytics unit
• An access database is used to automatically sort the patients by health home and generate an automated email listing those patients with new ER visits to each Health Home Director
• HCHs receive daily e-mails regarding ER visits
Performance Progress

A1c, LDL, and Blood Pressure
A1C Levels Over Time

1 POINT DROP IN A1C

- 21% ↓ in diabetes related deaths
- 14% ↓ in heart attack
- 31% ↓ in microvascular complications

About 7% had uncontrolled A1c levels

CMHC-HHs

Baseline: 10.01
Year 1: 8.96
Year 2: 8.58

PCHHs

Baseline: 9.81
Year 1: 9.20
Year 2: 9.07
About 45% had uncontrolled LDL levels

10% DROP IN LDL LEVEL
30% ↓ in cardiovascular disease

CMHC-HHs

Baseline: 130.25
Year 1: 115
Year 2: 111.5

PCHHs

Baseline: 130.28
Year 1: 121.53
Year 2: 117.19
BLOOD PRESSURE Changes Over Time

20%-24% had uncontrolled Blood Pressure levels

- **CMHC-HHs**
  - Baseline: 144.75
  - Year 1: 133.35
  - Year 2: 131.50
  - 13.25 mm Hg decrease

- **PCHHs**
  - Baseline: 149.38
  - Year 1: 142.40
  - Year 2: 143.87
  - 5.51 mm Hg decrease

- 6 POINT DROP IN BLOOD PRESSURE
  - ▪ 16% ↓ in cardiovascular disease
  - ▪ 42% ↓ in stroke

20% - 24% had uncontrolled Blood Pressure levels.
Hypertension and Cardiovascular Disease

<table>
<thead>
<tr>
<th></th>
<th>LDL Cardio</th>
<th>BP HTN</th>
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<tbody>
<tr>
<td>Feb'12</td>
<td>21%</td>
<td>24%</td>
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<tr>
<td>Feb'13</td>
<td>37%</td>
<td>41%</td>
</tr>
<tr>
<td>June'13</td>
<td>49%</td>
<td>55%</td>
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<tr>
<td>Goal</td>
<td>70%</td>
<td>60%</td>
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370

3665
Disease Management

Diabetes

(2822 Continuously Enrolled Adults)*

*29% of continuously enrolled adults

June, 2013

LDL

Feb'12: 22%
Feb'13: 38%
June'13: 47%
Goal: 36%

BP

Feb'12: 27%
Feb'13: 46%
June'13: 59%
Goal: 65%

A1c

Feb'12: 18%
Feb'13: 42%
June'13: 53%
Goal: 60%
Hospital Follow Up
Jan. 2012 through July 2014

%Follow-Up
%Medication
Reconciliation
Outcomes

Reducing Hospitalization

% of patients with at least 1 hospitalization
(non-duals, 9+ attestations)

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<tr>
<th>Year</th>
<th>CHMC</th>
<th>PC</th>
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<tr>
<td>Baseline</td>
<td>%</td>
<td>%</td>
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<td>Yr1</td>
<td>35</td>
<td>30</td>
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<td>Yr2</td>
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<td>25</td>
</tr>
<tr>
<td>Yr3</td>
<td>20</td>
<td>15</td>
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Initial Estimated Cost Savings after 18 Months

• CMHC Health Homes
  – 20,031 persons total served (includes Dual Eligibles)
  – Cost Decreased by $76.33 PMPM
  – Total Cost Reduction $15.7 M

• PC Health Homes
  – 23,354 persons total served (includes Dual Eligibles)
  – Cost Decreased by $30.79 PMPM
  – Total Cost Reduction $7.4 M
Approved State Plan Amendment(s) (15 States)
Planning Grant (18 States, DC, and Puerto Rico)

As of June 2014

Note: States with stripes have both

✓ Requires a significant change in the way of thinking and the practice patterns of providers

✓ Caring for an entire population and not just for the individual patients who actively seek care

✓ Adopt a new way of doing business

“Health information technology is absolutely “necessary but not sufficient” for creating practice-based population health management; committed executive and clinical leadership, care team development, and care coordination processes are also critical success factors.”

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1 Population Health Management: A Roadmap for Provider-Based Automation in a New Era of Healthcare, Institute for Health Technology Transformation, Chase, Alide, et.al.
What Makes it Possible?

• A Relationship of Basic Trust between:
  – Department of Mental Health
  – Mo HealthNet (medicaid)
  – State Budget Office
  – MO Coalition of CMHCs
  – MO Primary Care Association

• Transparent use of data instead of anecdotes to explore and discuss issues

• Willingness of all partners to tolerate and share risk

• Principled Negotiation and Motivational Interviewing
Dysfunction

The only consistent feature of all of your dissatisfying relationships is you.
S.M.R. Covey, *The Speed of Trust*

**Behaviors that Promote Trust**

> **Character**
>  - Talk Straight
>  - Demonstrate Respect
>  - Create Transparency
>  - Right Wrongs
>  - Show Loyalty

> **Competence**
>  - Deliver Results
>  - Get Better
>  - Confront Reality
>  - Clarify Expectations
>  - Practice Accountability

> **Character & Competence**
>  - Listen First
>  - Keep Commitments
>  - Extend Trust
Partnership Principles

**DON’T**
- Talk about your need first
- Expect to get something
- Limit assistance to a project
- Make it about this deal
- Push a specific position
- Withhold information
- Let them take their lumps

**DO**
- Ask about their needs first
- Give something
- Assist wherever you can
- Make it about the next 10
- Pursue common interest
- Reveal anything helpful
- Take one for the team
What BH Organizations Need to Evolve and Prosper

• A Role no one else wants or can do
• Data, Data, and more Data
• Willingness to Change
• Willingness to Risk
• Integration with the Rest of Health Care
• Training, Training, and more Training
CHANGE

When the Winds of Change Blow Hard Enough, the Most Trivial of Things can turn into Deadly Projectiles.
WebSites

• Missouri CMHC Healthcare Homes
  http://dmh.mo.gov/mentalillness/mohealthhomes.html

• Healthcare Home Source documents Page
  http://dmh.mo.gov/mentalillness/introcmhchchch.html

• NASMHPD Technical Reports
  www.nasmhpd.org/medicaldirector.cfm