



November 1, 2021

The Honorable Ron Wyden
Chair
Committee on Finance
U.S. Senate
Washington, D.C. 20510

The Honorable Mike Crapo
Ranking Member
Committee on Finance
U.S. Senate
Washington, D.C. 20510

Dear Chair Wyden and Ranking Member Crapo:

On behalf of Bamboo Health, thank you for the opportunity to provide responses to the request for information on legislative proposals to improve access to health care services for Americans with mental health and substance use disorders. Bamboo Health provides trusted technology solutions to federal and state governments, payers, health systems, clinicians, pharmacies, and health information exchanges working to improve public health. In partnership with state governments, Bamboo Health has built the nation's most comprehensive, standards-driven data integration platform to combat the nation's ongoing opioid epidemic. This tool complements our other solutions focused on connecting patients to behavioral health resources and providing real-time alerts on clinically relevant patient events to providers. Through these offerings, Bamboo Health is implementing the tools needed to identify patients in need of help and connect them to medical and behavioral health services to improve their wellbeing.

Our comments and recommendations, included below, are informed by our experience in the care coordination space, through ongoing collaboration with the many providers and entities we serve. We recognize and deeply appreciate the complexity of delivering a health care system that best serves patients with mental health and substance use disorders, and hope that our input may be of use in your efforts to improve the access to, and quality of, such a system. The following constitutes our responses and recommendations to questions relevant to our experience within the behavioral health space. We welcome any opportunity to collaborate with you further on these items.

Are there other payment or system deficiencies that contribute to a lack of access to care coordination or communication between behavioral health professionals and other providers in the health care system?

As a provider of referral and capacity management solutions for behavioral health through our Open Beds platform, Bamboo Health has become acutely aware of the widespread lack of insight providers typically have into available beds and service providers for referrals and coordinated care. This lack of visibility into and knowledge of available inpatient and outpatient behavioral healthcare services and community-based alternatives is frequently a barrier to treatment for those most in need of care. In our experience, providers find the current SAMHSA

treatment locator to be rudimentary and lacking in the ability to incorporate availability, leaving providers with the burden of coordinating care across a fragmented health delivery system with limited visibility. To best serve patients, providers need to have more sophisticated tools available to allow for coordinated care and warm handoffs between providers.

In addition to referral and capacity management solutions, the extensive lack of insight into patient care events creates significant barriers in communication and coordination between the various providers and care team members whose collaboration can oftentimes be essential for successful patient outcomes. The COVID-19 pandemic has shone a light on the long-standing issues of emergency department (ED) overcrowding and wait times, which delay access to critical, appropriate care for patients in need. Real-time visibility into when patients present to an ED for behavioral health or substance use disorder related events empowers managing providers to engage in timely interventions, improving outcomes for their patients. Conversely, treating providers at the point of care benefit from real-time historic context on patient care and prior events, allowing them to make more informed decisions in the moment. Through our Pings solution, Bamboo Health has found that leveraging admit, discharge, and transfer (ADT) data is an effective way to ensure providers and care team members have access to this critical information in a timely and actionable manner.

What are the best practices for integrating behavioral health with primary care? What federal payment policies would best support care integration?

Creating a system that favors whole person care, combining physical and mental health, is crucial for improving patient outcomes. Primary care providers are often the first to identify changes in condition for their patients, and typically have the highest chances of impacting care, through both their comprehensive context on, and relationships with their patients. As such, payment policies should subsidize tools that better enable primary care providers to be an active member of their patients' mental health care teams. When primary care transfers a patient to behavioral health, the handoff that occurs is a critical point in determining the success of the patient's treatment. A warm handoff between primary care and specialized mental health and substance use disorder care empowers all members of a patient's care team to provide the best, most informed care for the patient. Through Bamboo Health's Open Beds solution, we have found that communication between providers during the referral process and once a patient has begun receiving services leads to an increase in positive care outcomes.

A recent study by the Medical Group Management Association (MGMA) found that an overwhelming percentage of medical practices have noted an increase in regulatory and

administrative burden.¹ Incentivizing the inclusion of critical information for behavioral health care coordination directly within a provider's existing workflows, such as within their electronic medical record (EMR) or other care coordination platform, would assist in alleviating certain aspects of administrative burden. Today, primary care providers are often required to cross-check many different systems and sources while treating a patient to access vital patient information. EMRs offer some integrations with outside information sources today, however these are oftentimes not designed with the providers' existing workflows in mind. Thoughtfully embedding different data and information sources within providers' existing workflows ensures that they will have easy access to essential information in a timely manner, reducing the likelihood that information that could inform treatment could be overlooked.

What programs, policies, data, or technology are needed to improve access to care across the continuum of behavioral health services?; What programs, policies, data, or technology are needed to improve patient transitions between levels of care and providers?

Timely, actionable information is vital for successful improvements to behavioral health service access and efficacy, as well as to improve patient transitions between levels of care and providers. Specifically, insight into patient events (through sources such as ADT data), inpatient and outpatient service availability (through referral management platforms), and available social services or community programs all are crucial for improving access to and transitions within behavioral health settings of care.

Successful coordination and transitions between levels of care and providers require timely communication and insights across a patient's care team and prior care. Treating providers often lack insight into the overall context of a patient's prior care and current resources, which can significantly influence decisions related to transitions of care. Historic data often is sourced using claims histories; however, ADT data offers a more timely and flexible solution, cutting the time between a patient event occurring and the information becoming available from months to minutes.

How can providers and health plans help connect people to key non-clinical services and supports that maintain or enhance behavioral health?

Bamboo Health, through its payer-provider communication solution, Callouts, has found that providers and health plans can most effectively help connect patients to non-clinical services and supports that ultimately lead to improved outcomes for behavioral health through close communication and collaboration. Health plans are uniquely positioned to impact behavioral

¹ Medical Group Management Association. (2021). *Annual Regulatory Burden Report*.
<https://www.mgma.com/resources/government-programs/mgma-annual-regulatory-burden-report-2021>.



health for their members based on the robust information they have on their members' history and care across the continuum based on their claims data. This information helps bridge care events that have occurred across different providers, health systems, and settings of care, providing crucial context when determining best-fit for non-clinical services. Additionally, health plans may offer benefits for certain non-clinical services, improving accessibility for their members.

Providers, who ultimately are the best positioned for impacting care and outcomes on the ground, benefit greatly from having access to the aforementioned information in a timely manner. With access to a health plan's insights on a patient in real-time, while working with the patient at the point of care, a provider is able to make better informed care decisions.

Furthermore, communication between the health plan, treating providers, and a patient's care team ensures that providers at the point of care are aware of any prior access to non-clinical services. This creates the potential to ease the patient's current transition to non-clinical services through either re-enrolling them in prior services, or pivoting to a different service, based on the patient's history.

Bamboo Health appreciates the opportunity to submit these responses and shares the Senate Committee on Finance's goals of improving accessibility to timely, quality mental health care and substance use disorder services. Should you have any questions or require further information, please do not hesitate to contact us at mmkane@bamboohealth.com.

Sincerely,

A handwritten signature in black ink that reads "Molly Kane".

Molly Kane, Government Affairs Manager

Bamboo Health