The Ideal Crisis System:
Strategies for Mental Health and Law
Enforcement Collaboration to Prevent
Justice Involvement

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- Friday. 4:30 PM. The phone rings.
- Your spouse's boss needs help with his brother.
- He's been texting family members about how he would be better off dead.
- They're afraid he might hurt himself.
- He might also have a drinking problem and need detox.



What do you advise?



# CALL THE PSYCHIATRIST/THERAPIST/CLINIC

**CALL** 911





# GO TO THE **EMERGENCY** ROOM

# GO TO THE CRISIS CENTER

GO TO THE

DETOX CENTER





# A behavioral health crisis is an emergency.

It requires a **Systemic**response with the **same quality and consistency**as the response to heart attack, stroke, fire, and other emergencies.



# A SYSTEMIC response to behavioral health crisis

- that delivers EVIDENCE-BASED care to people who need it
- with MEASURABLE OUTCOMES
- in the LEAST-RESTRICTIVE setting that can safely meet the person's needs
- (and by the way, the leastrestrictive settings also tend to be the LEAST-COSTLY)



# • WHAT'S YOUR • EMERGENCY

"I'm having chest pain."



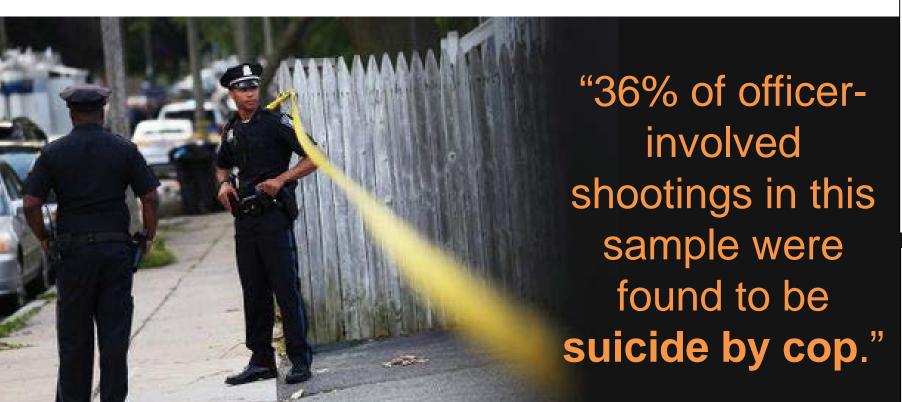


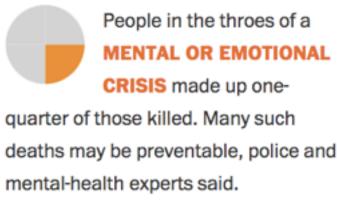
"I'm suicidal."





# Officer-involved shootings





#### See The Post's takeaways

# Washington Post Nationwide Database of Police Fatalities

https://www.washingtonpost.com/graphics/national/police-shootings-2016/

J Foressic Sci. March 2009, Vol. 54, No. 2 doi: 10.1111/j.1556-4029.2008.00981.x Available online at: www.blackwell-synergy.com

Kris Mohandie, 1 Ph.D.; J. Reid Meloy, 2 Ph.D., A.B.P.P.; and Peter I. Collins, 3 M.C.A., M.D., F.R.C.P.(C)

Suicide by Cop Among Officer-Involved Shooting Cases



#### There are over

### 2 million jail bookings

of people with serious mental illness (SMI) each year.1

Nearly half of people with SMI have been arrested at least once.<sup>2</sup>

Prevalence of Mental Illness		
	US Adults <sup>5</sup>	Jail
SMI <sup>3</sup> -Men -Women	4%	17.1% 34.3%
Any mental disorder <sup>4</sup>	18%	<b>7</b> 6%
+ Co-occurring substance use <sup>4</sup>	3.3% <sup>6</sup>	49%

- 1. Steadman HJ et al. (2009) Prevalence of serious mental illness among jail inmates. Psychiatric Services. 60(6):761-5.
- 2. 44%. Hall LL et al. (2003) TRIAD Report: Shattered Lives: Results of a National Survey of NAMI Members Living with Mental Illnesses and Their Families.
- 3. Includes PTSD. Excluding PTSD rates are 14.5% for men and 31.0% for women. Steadman HJ, Osher FC, Robbins PC, Case B, Samuels S. (2009). Psychiatric Services. 60(6):761-5.
- Glaze LE, James DJ. (2006) Mental Health Problems Of Prison And Jail Inmates. Bureau of Justice Statistics.
- NIMH Statistics <a href="https://www.nimh.nih.gov/health/statistics/index.shtml">https://www.nimh.nih.gov/health/statistics/index.shtml</a>
- 6. SAMHSA (2015). Behavioral Health Trends in the United States: Results from the 2014 National Survey on Drug Use and Health.

#### What about kids?

The National Center for Mental Health and Juvenile Justice found that 70.4% of youth in the juvenile justice system have been diagnosed with at least one mental health disorder.

High-risk youth are estimated to cost society **\$1.2 to 2 million each** in rehabilitation, incarceration, and costs to victims.



# Impact of incarceration<sup>1,2</sup>

- Offenders with mental illness are
  - Incarcerated twice as long
  - Three times more likely to be sexually assaulted while incarcerated
  - More likely to be in solitary confinement which exacerbates psychiatric symptoms
- Adverse effects post-release include
  - Interruption in Medicaid and other benefits
  - Difficulty finding employment
  - More likely to become homeless
  - More likely to be rearrested
- At twice the cost to taxpayers.
- Treatment Advocacy Center & National Sheriffs Association (2014). The Treatment of Persons with Mental Illness in Prisons and Jails: A State Survey
- Dumont DM et al. (2012). Annu Rev Public Health. 2012 Apr 21; 33: 325–339.
- 3. Office of National Drug Control Policy



Jails and prisons lack the policies and trained staff to meet the needs of this population.



**MYTH** 

"They'll get the treatment they need in jail."

Only one quarter of men and 14% of women receive formal substance abuse treatment while incarcerated.<sup>3</sup>

# If they do make it to an ED...

- 84% of EDs report boarding of psychiatric patients
- Increased risk
  - Assaults, injuries, self-harm
- Increased cost
  - Sitters, lost revenue
  - Unnecessary inpatient admits
- Poor patient experience
  - Non therapeutic environment with untrained staff

Psychiatric boarding = long waits for inpatient psychiatric beds with little/no treatment, for hours or sometimes even days.

American College of Emergency Physicians (2014)
<a href="http://newsroom.acep.org/download/ACEP+Polling+Survey+Report.pdf">http://newsroom.acep.org/download/ACEP+Polling+Survey+Report.pdf</a>
Zeller et al (2014) <a href="https://dx.doi.org/10.5811%2Fwestjem.2013.6.17848">https://dx.doi.org/10.5811%2Fwestjem.2013.6.17848</a>



# A National Standard for Crisis Services?

#### Interdepartmental Serious Mental Illness Coordinating Committee

The Way Forward: Federal Action for a System That Works for All People Living With SMI and SED and Their Families and Caregivers

December 13, 2017

- Interdepartmental SMI Coordinating Committee (ISMICC)
- Created by 21st Century Cures Act
- 45 recommendations in 5 focus areas
- 2.1 Define and implement a national standard for crisis care

In response, the Group for the Advancement of Psychiatry is developing a comprehensive report defining elements of the ideal crisis system

#### **Measurable Performance Standards**

in the following areas



Governance & Finance



Crisis Continuum: Essential Services & Program Capabilities



Clinical Best Practices & Competencies



# **SYSTEM**

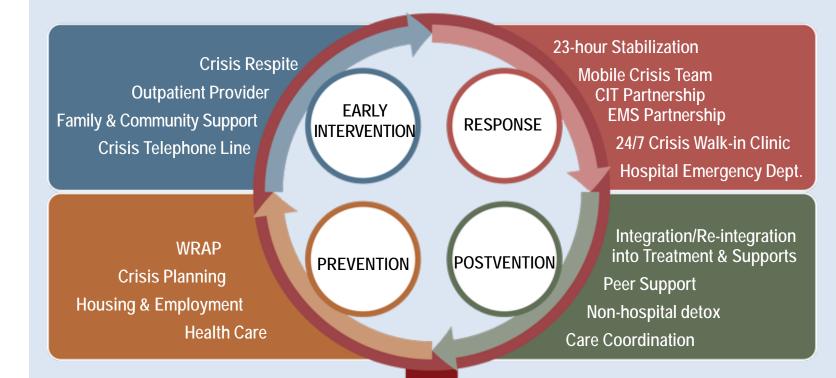
### vs. Services

A crisis system is more than a collection of services.

Crisis services must all work together as a coordinated system to achieve common goals.

And be more than the sum of its parts.

A crisis system needs a robust **continuum of services** to meet the needs of people in various stages of crisis.



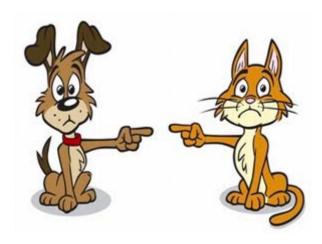
### TRANSITION SUPPORTS Critical Time Intervention, Peer Support & Peer Crisis Navigators

Adapted from: Richard McKeon (Chief, Suicide Prevention Branch, SAMHSA). Supercharge Crisis Services, National Council for Behavioral Health Annual Conference, 2015.



# 3 Key Ingredients for a SYSTEM

#### **Accountability**



- Who is *responsible* for the system?
- Governance and financing structure
- System values and outcomes
- Holding providers accountable

#### **Collaboration**



- Broad inclusion of potential customers, partners, & stakeholders
- Alignment of operational processes & training towards common goals
- Culture of communication & problem solving

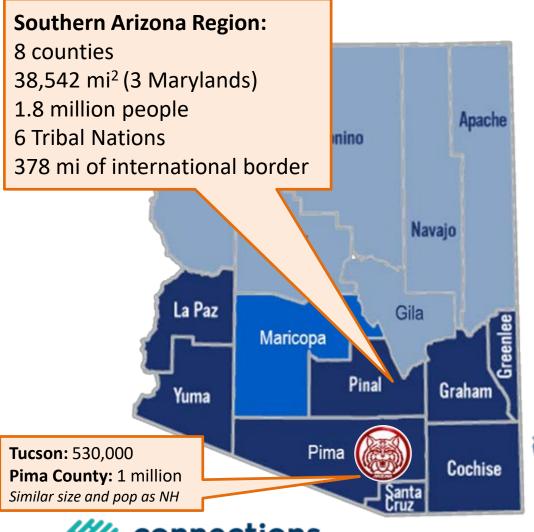
#### Data

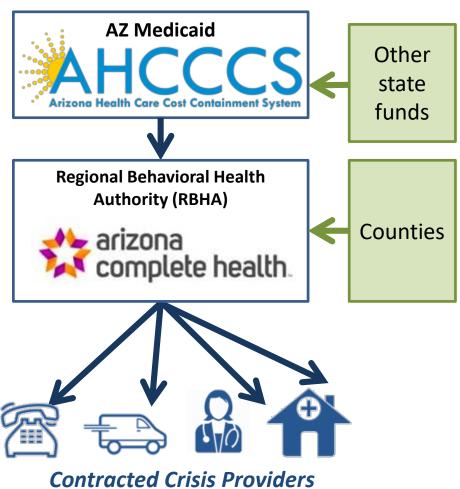


- Are we achieving desired outcomes?
- Performance targets & financial incentives
- Continuous quality improvement
- Data driven decision making



# Arizona Crisis System Structure





The financing & governance structure supports organization, accountability, & oversight of the system.

# What this means for the crisis system

Centralized planning

- Regional Behavioral Health Authority
- Centralized accountability
- Alignment of clinical & financial goals

Performance metrics and payment systems that **promote common goals** 

#### **Decrease**

- ED & hospital use
- Justice involvement

#### Increase

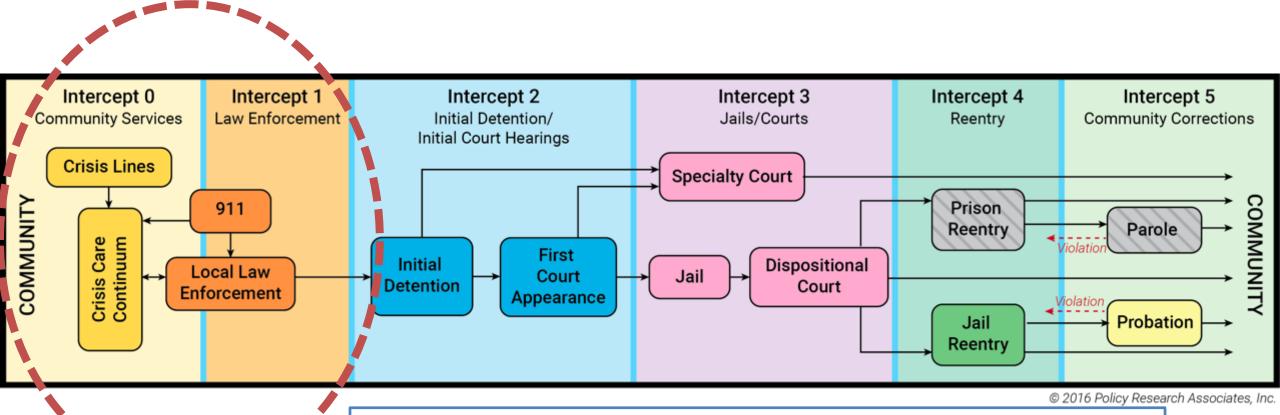
- Community stabilization
- Engagement in care

These goals represent <u>both</u> **good clinical care & fiscal responsibility.** 





# Sequential Intercept Model



#### What is the Sequential Intercept Model?

- Every person follows a path through the justice system: Arrest, detention, arraignment, pre-trial, etc.
- At every point along this path, there is an opportunity for the behavioral health system to "intercept" the person and either
  - Stop them from progressing further (diversion)
  - Mitigate the effects of justice involvement
- Crisis services are focused on Intercept 1:
  - Interactions with law enforcement to <u>prevent unnecessary arrest</u>

Munetz MR and Griffin PA. (2006) "Use of the Sequential Intercept Model as an Approach to Decriminalization of People With Serious Mental Illness." Psychiatric Services 57:4.



# Example of strategic service design



**State** says: Reduce criminal justice costs for people with SMI.



**AHCCCS** contracts with regional Medicaid MCOs/RBHAs and includes requirements targeted at reducing criminal justice involvement.



**RBHA** (which is at risk) uses contract requirements/VBP with its subcontracted providers to create services and processes targeted at reducing justice involvement.

#### **Targeted Services and Processes:**

Law Enforcement as a "preferred customer"

#### **CRISIS LINE**

- Some 911 calls are warm-transferred to the crisis line
- Dedicated LE number goes directly to a supervisor

#### **MOBILE TEAMS**

- 30 minute response time for LE calls (vs. 60 min routine)
- Some teams assigned as co-responders (cop + clinician)

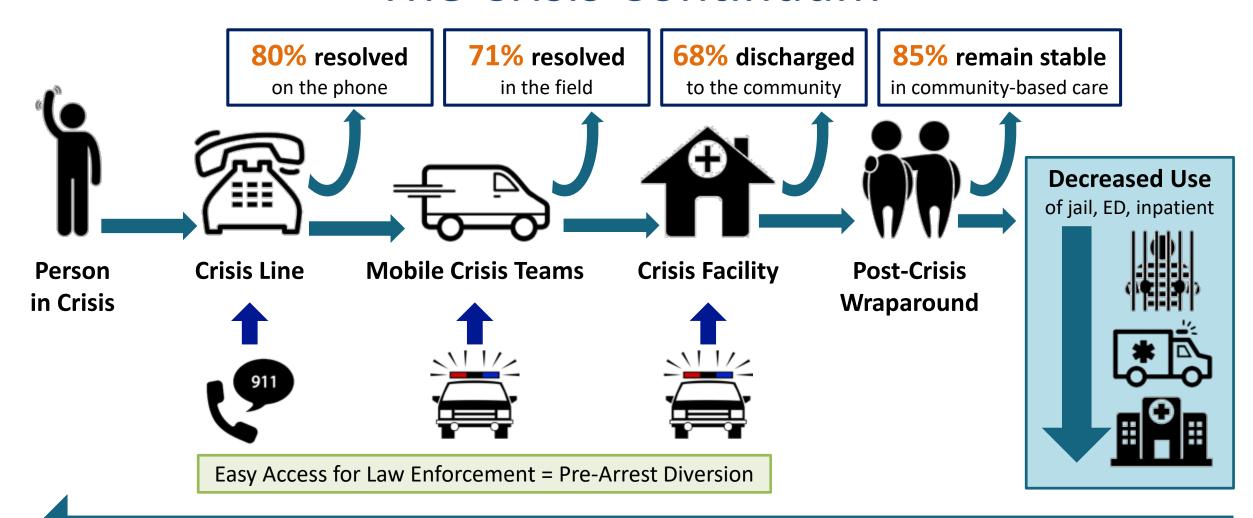
#### **CRISIS CENTERS**

- 24/7 crisis facility
- Quick & easy drop-off for law enforcement
- No wrong door LE is never turned away





### The Crisis Continuum



LEAST Restrictive = LEAST Costly



Many options for law enforcement to divert people to treatment instead of jail all with a culture of NO WRONG **DOOR** 

#### **Crisis Hotline**

- Info, care coordination
- Direct line for LE
- Some co-located at 911



#### **Law Enforcement Training**

- Supported by RBHA & multiple community partners
- Tucson PD and Pima Co Sheriff are 100% MHFA & 80% CIT trained

#### **Crisis Response Center** 24/7 Crisis Center for Adults and Youth

- <10 minute LE drop-off time
- Law enforcement never turned away
- Adjacent to ED, Court, Inpatient psych
- Clinic, 23 hour obs, initiation of Opiate MAT







PIMA COUNTY

#### Mobile Crisis Teams 🖚

- Masters level clinicians
- On-site crisis intervention
- 30-min response time for LE





- MHST Detective
- Mobile Team Clinician

#### Co-Responder Teams

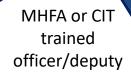
#### **Mental Health Support Teams (MHST)**

- In addition to CIT
- Unique specialized team specializing in civil commitment, challenging cases, and follow-up
- Officers/Deputies & Detectives













"LEO"

#### **Access Point**

- 24/7 Detox/Crisis for Voluntary Adults
- <10 minute LE drop-off time
- Transitions to substance use tx/MAT

#### **Regional Behavioral Health Authority**

- First Responder Liaisons
- Responsible for the network of programs and clinics



#### **BH Services at the Jail**

- Instant data exchange with MH history
- Risk screening
- Diversion programs, specialty courts, etc.







# The Crisis Response Center

- Built with Pima County bond funds in 2011
  - Alternative to jail, ED, hospitals
  - Serving 12,000 adults + 2,400 youth per year
- Law enforcement receiving center with NO WRONG DOOR (no exclusions for acuity, agitation, intoxication, payer, etc.)
- Services include
  - 24/7 urgent care clinic (adult length of stay 2 hours, youth 3 hours)
  - 23-hour observation (adult capacity 34, youth 10),
  - Short-term subacute inpatient (adults only, 15 beds, 3-5 days)
- Space for co-located community programs
  - peer-run post-crisis wraparound program, pet therapy, etc.
- Adjacent to
  - Banner University Medical Center (ED with Level 2 Trauma Center)
  - Crisis call center
  - Inpatient psych hospital for civil commitments
  - Mental health court



## **Connections Model**

"We address any behavioral health need at any time."

- "No wrong door"
- We take everyone:
  - No such thing as "too agitated" or "too violent"
  - Can be highly intoxicated
  - Can be involuntary or voluntary
- Fewer medical exclusionary criteria than many inpatient psych hospitals
- Law enforcement is never ever turned away
- Studies show this model:
  - Critical for pre-arrest diversion<sup>2</sup>
  - Reduces ED boarding<sup>3,4</sup>
  - Reduces hospitalization<sup>3,4</sup>

These 2 are the hardest to do well

# CIT Recommendations for Mental Health Receiving Facilities<sup>1</sup>

- 1. Single Source of Entry
- 2. On Demand Access 24/7
- 3. No Clinical Barriers to Care
- 4. Minimal Law Enforcement Turnaround Time
- 5. Access to Wide Range of Disposition Options
- 6. Community Interface: Feedback and Problem Solving Capacity



<sup>2.</sup> Steadman HJ et al (2001). A specialized crisis response site as a core element of police-based diversion programs. Psychiatr Serv 52:219-22

<sup>4.</sup> Zeller S et al. (2014). Effects of a dedicated regional psychiatric emergency service on boarding of psychiatric patients in area emergency departments. West J Emerg Med 15(1): 1-6.



<sup>3.</sup> Little-Upah P et al. (2013). The Banner psychiatric center: a model for providing psychiatric crisis care to the community while easing behavioral health holds in emergency departments. Perm J 17(1): 45-49.

# Easy Access for Law Enforcement so we are the preferred alternative to drop off at jail or ED





#### The locked 23h obs unit provides a safe, secure, and therapeutic environment:

- Continuous observation
- Lack of means to hurt oneself or others
- Therapeutic milieu: Open area for therapeutic interactions with others

Crisis Response Center, Tucson AZ

As welcoming as possible



Urgent Psychiatric Center Phoenix, AZ

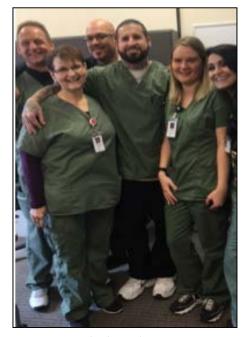


## 23-Hour Observation Unit

- Interdisciplinary Teamwork
  - 24/7 psychiatric provider coverage (MD, NP, PAs)
  - Peers with lived experience, nurses, techs, case managers, therapists, unit coordinators
- Early Intervention
  - Median door to doc time is ~90 min
  - Interventions include medication, detox/MAT, groups, peer support, safety planning, crisis counseling, mindfulness
- Aggressive discharge planning
  - Collaboration and coordination with community & family partners
- Culture shift: Assumption that the crisis can be resolved

60-70% discharged to the community the following day

Avoiding preventable inpatient admission, even though most met medical necessity criteria when they first presented



Peers with lived experience are an important part of the interdisciplinary team.

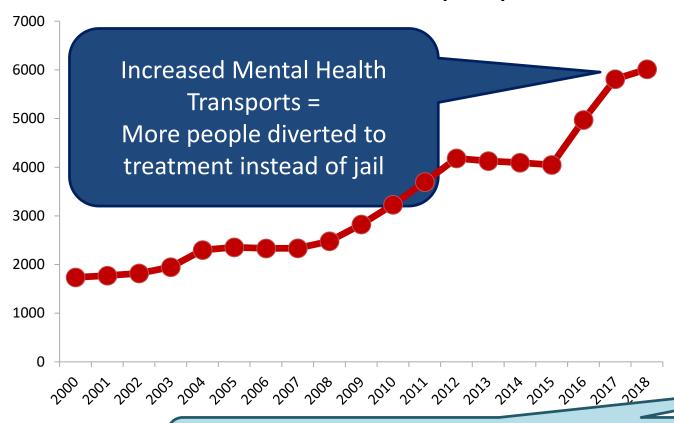
"I came in 100% sure I was going to kill myself but now after group I'm hopeful that it will change. Thank you RSS members!"

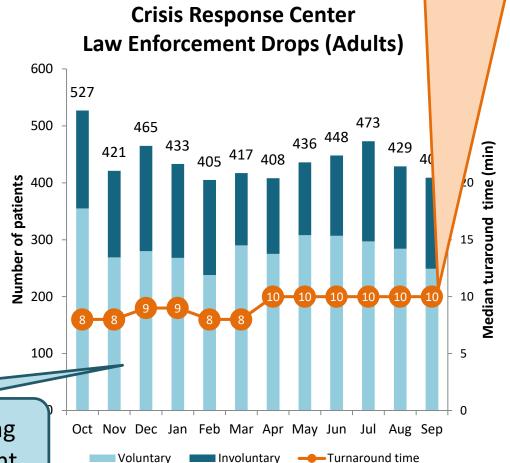


### **MORE People Taken to Treatment...**

**Tucson Police Mental Health Transports per Year** 

Cops like quick turnaround time (10 min) so that it's easier to bring people to treatment instead of jail.





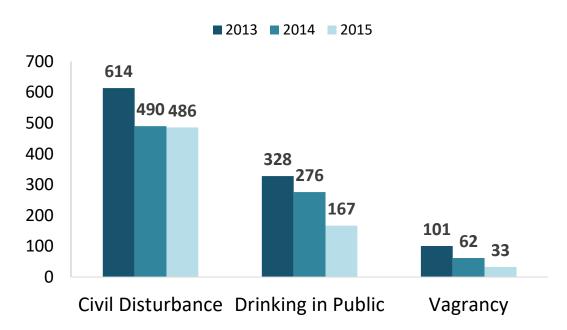
Most drops are voluntary (light bars), meaning the officers are engaging people into treatment.



### ... and LESS Justice Involvement

Fewer calls for low-level crimes that tend to land our people in jail.

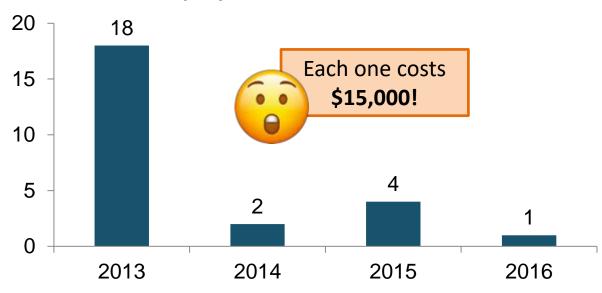
#### **TPD "Nuisance Calls" Per Year**



Culture change in how law enforcement responds to mental health crisis.

Tucson Police Dept.

SWAT deployments for Suicidal Barricade



Balfour ME, Winsky JM and Isely JM; The Tucson Mental Health Investigative Support Team (MHIST) Model: A prevention focused approach to crisis and public safety. *Psychiatric Services*. 2017;68(2):211-212; <a href="https://dx.doi.org/10.1176/appi.ps.68203">https://dx.doi.org/10.1176/appi.ps.68203</a>

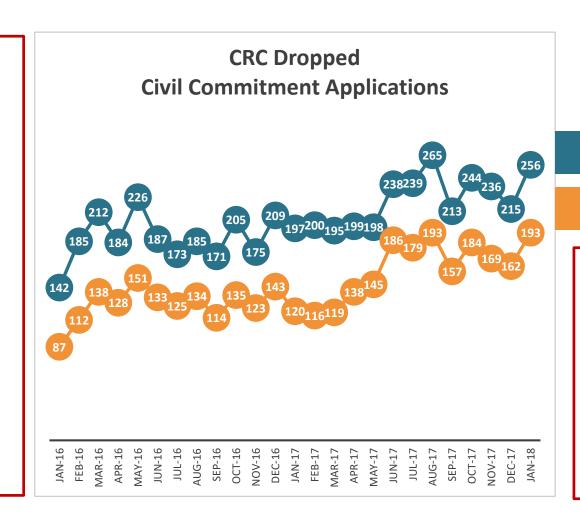


# Crisis Stabilization Aims for the **Least-Restrictive** (and least costly) Disposition Possible

# **65%**Discharged to Community (Diversion from Inpatient)

- People admitted to the 23-hour observation unit who are discharged to community-based care instead of inpatient admission.
- Most can be stabilized for community dispositions with early intervention, proactive discharge planning, and collaboration with families and other community supports





#### **Emergency Applications**

**Dropped after 24 hours** 

70%
Converted to Voluntary Status
People under involuntary hold who are then discharged to the community or choose voluntary inpatient admission

#### **Co-Responder Innovations:**

Increasing connection to care while
minimizing involuntary treatment and/or arrest

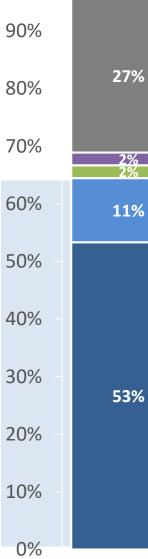


Tucson Police Department Mental Health Support Team (MHST) Detective



Paired with a Mobile Team Clinician

- Working together on cases flagged by Police
- Acute, High Needs, High Risk (danger to other, self)
- People who may need involuntary treatment



100%

4%

**Civil Commitment** 

Petition

Unable to Assess

Remain in Jail

Transport to 23 Hour

Crisis Stabilization

**MOST** remain

in the community

**Community Supports** 

with Welfare Check

Community Supports with Crisis Followup



The newest co-responder teams use peer navigators and focus on opiate treatment.



### **Newest Innovations**





# HELP ME!

#### **Co-Responder Teams**

- Mobile crisis clinician assigned to MHST detectives
- Focus on followup and investigations
- Increased community stabilization (vs transport to facility or civil commitment petitions)

#### **Deflection Program**

- Peer co-responders focused on SUD and overdoses
- Option not to arrest for possession of small amounts of illicit substances
- Connection to treatment instead
- 24/7 access to treatment

#### **Homeless Outreach**

- Increased outreach to people experiencing homeless in the community
- Identify and engage people needing services
- Collaboration with community stakeholders
- Focus on housing first models

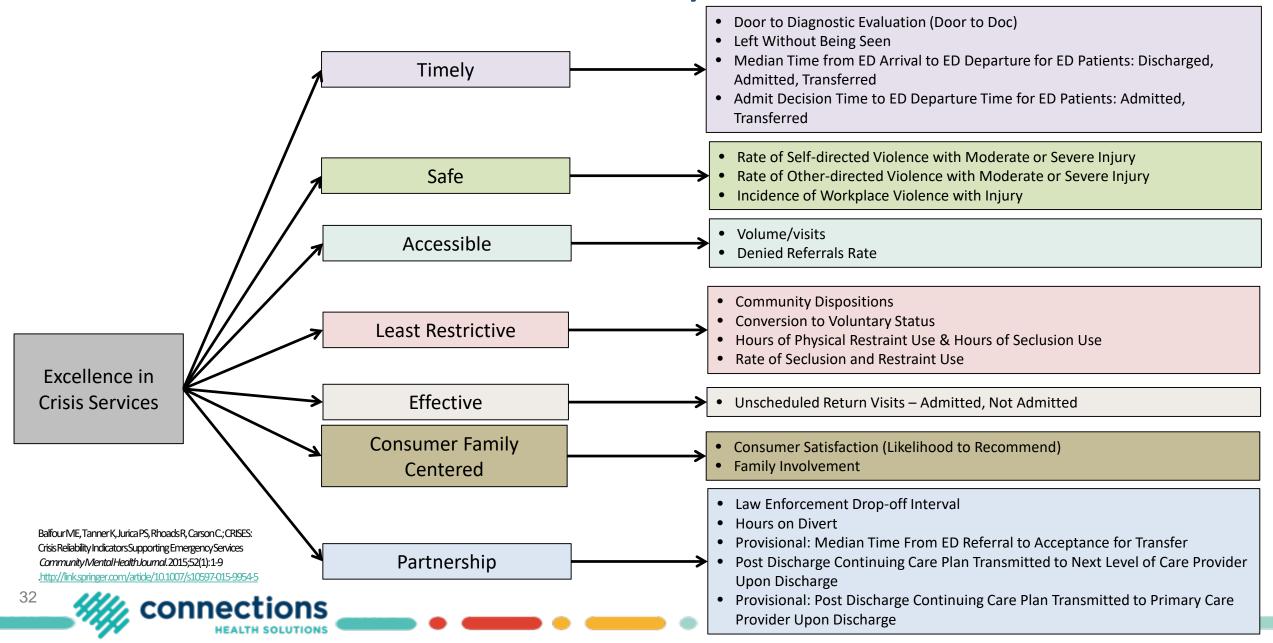


Using data to improve care





## Outcome metrics for facility-based crisis services



### **Connections Crisis Facility KPIs**

Metric	Outcome	Relevance	
Urgent Care Clinic: Door-to-Door  Length of Stay	< 2 hours	Patients get their needs met quickly instead of going to an ED or allowing symptoms to worsen.	
23-Hour Obs Unit:  Door-to-Doctor Time	< 90 min	Treatment is started early, which results in higher likelihood of stabilization and less likelihood of assaults, injuries and restraints.	
23-Hour Obs Unit:  Community Disposition Rate (diversion from inpatient)	60-70%	Most patients are able to be discharged to less restrictive and less costly community-based care instead of inpatient admission.	
Law Enforcement Drop-Off Police Turnaround Time	< 10 min	If jail diversion is a goal, then police are our customer too and we must be quicker and easier to access than jail.	
Hours of  Restraint Use per 1000 patient hours	< 0.15	Despite receiving highly acute patients directly from the field, our restraint rates are 75% below the Joint Commission national average for inpatient psych units.	
Patient Satisfaction Likelihood to Recommend	> 85%	Even though most patients are brought via law enforcement, most would recommend our services to friends or family.	
Return Visits within 72h following discharge from 23h obs	3%	People get their needs met and are connected to aftercare. A multiagency collaboration addresses the subset of people with multiple return visits.	



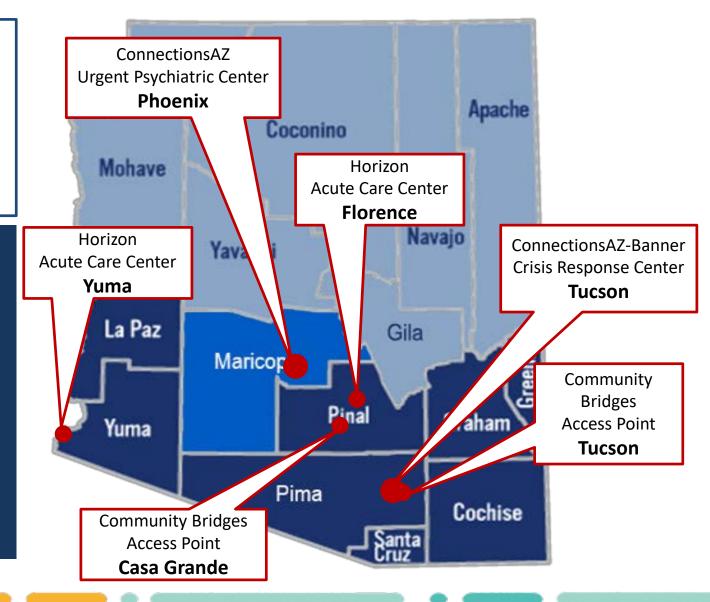
### Standard Crisis Scorecard Across the Southern Arizona Region

The Regional Behavioral Health Authority requires the other

23h crisis facilities to use this framework.

arizona complete health.

- Consistent outcome measurement across the Southern AZ network
- Monthly data reviews to monitor system performance across the region
  - Insight into volume trends
  - Bed capacity and throughput
  - Community acuity and engagement
  - Ensure accountability and proper discharge planning

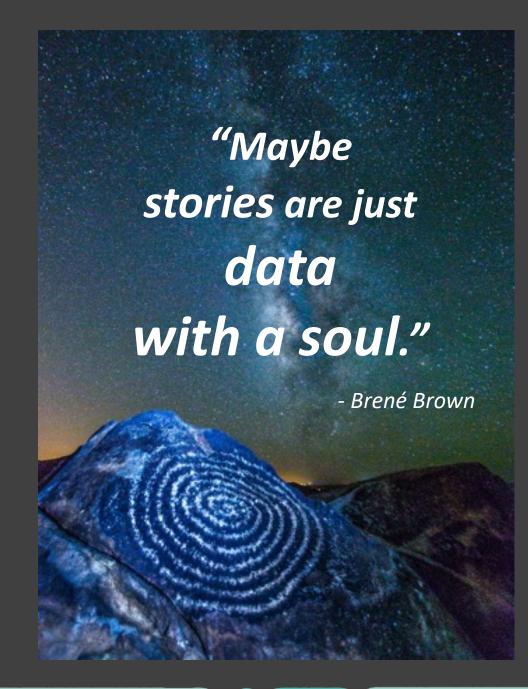




# Systems Approach: How can crisis data help improve the whole behavioral health system?

Every crisis visit is a **Story** about how someone **couldn't get their needs met** in the community.

If we **turn the stories into data**, it can **reveal trends** about things that need improving in the overall behavioral health system.



# The Canary in the Coal Mine for what's NOT working in the community

"I couldn't get in to see my doctor at my clinic."

"These meds aren't working."

"I couldn't get my case manager on the phone."

"I missed my appointment because I don't have transportation." **Crisis Center** 



"What are you in for?"

"There was a problem at the pharmacy and I couldn't get my meds filled."

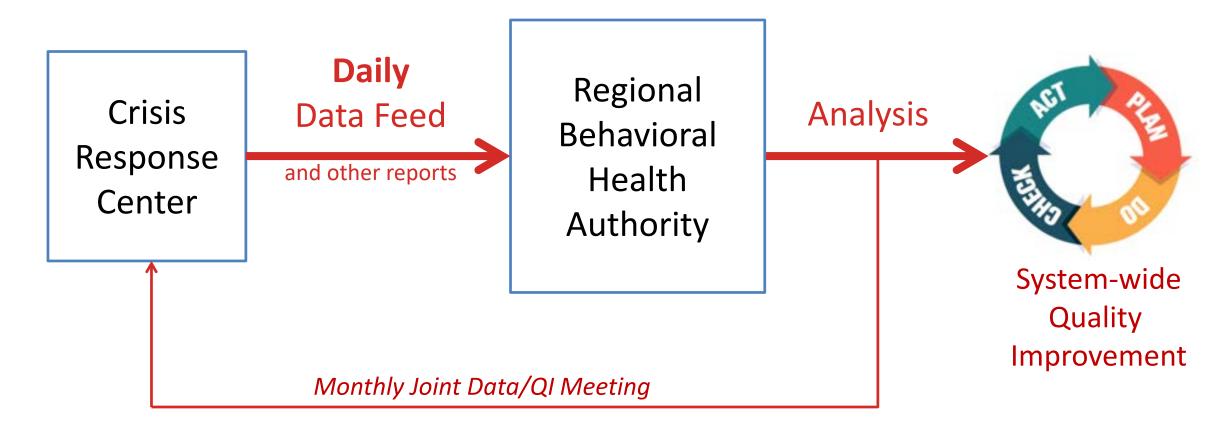
"I don't have a safe place to stay."

"I got kicked out of my group home... AGAIN."

"My mom can't handle me at home by herself."



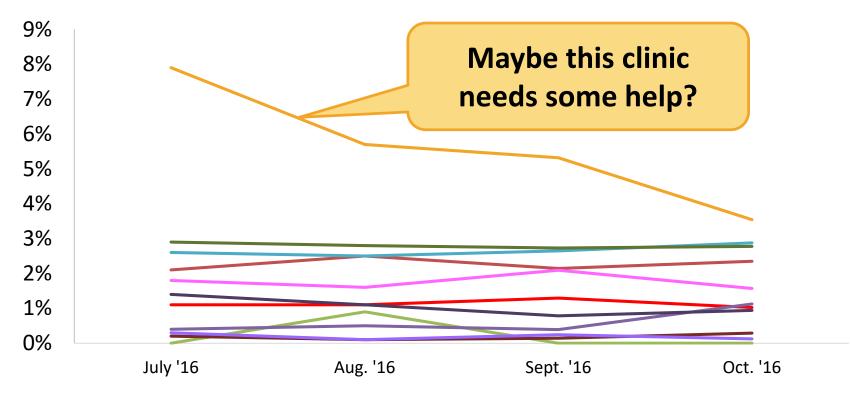
## CRC-RBHA Data/QI Partnership



Balfour ME, Zinn T, Cason K, Fox J, Morales M, Berdeja C, Gray J; Provider-Payer Partnerships as an Engine for Continuous Quality Improvement; *Psychiatric Services*; 2018;69(6):623-625; <a href="https://doi.org/10.1176/appi.ps.201700533">https://doi.org/10.1176/appi.ps.201700533</a>

### The power of collaboration: Crisis utilization by clinic





CRC has the NUMERATOR

RBHA has the DENOMINATOR



### Operationalizing Data Sharing

- Automated feed sent daily from the CRC to RBHA
- Additional consents are not required since RBHA is the payer. (Non-RBHA patients are removed before any data is sent.)
- We try to integrate reports into our existing workflows.
- UM staff abstracts charts of patients readmitted to the subacute unit

### **Daily Data Feed**

Last	First		Admit		CIS	Discharge	
Name	Name	DOB	Date	ICC	Client ID	Date	Disposition
			6/6/17	MHC Healthcare		6/7/17 16:56	Home with Comm Referrals
			6/6/17	Declined		6/7/17 16:10	Home with Comm Referrals
			6/5/17	LA FRONTERA		6/7/17 11:20	Group Home
				Arizona Children Association		6/7/17 23:15	Sonora Hospital
			6/7/17	CODAC		6/7/17 3:18	Home with Comm Referrals
			6/6/17	COPE		6/7/17 15:25	Level 2 Facility

- List of all discharges (23 hour obs and inpatient)
- Key demographic and patent-level info
- Sent daily each morning to
  - RBHA for data analysis
  - Responsible clinic for QI/feedback
  - Crisis Line for followup/aftercare tracking



### Adults: "Familiar Faces" QI Plan

**DATA REPORTING:** The CRC sends a monthly rolling frequent utilizer report to Cenpatico.

Last	First						Clinic			Visit this
name	name	dob	ICC	T19 status	rbha	payer	Only	Obs	Total	month?
			LA FRONTERA	SMI T19	Cenpatico	AHCCCS only	9	10	19	Υ
			LA FRONTERA	SMI T19	Cenpatico	AHCCCS only	0	4	4	Υ
			COPE	SMI T19	Cenpatico	AHCCCS & Medicare	0	4	4	Υ
			LA FRONTERA	SMI T19	Cenpatico	AHCCCS only	0	6	6	Υ
			COPE	SMI T19	Cenpatico	AHCCCS only	1	4	5	Υ

MULTI-AGENCY TEAM MEETINGS with CRC, RBHA, clinic staff to discuss the patient's needs and develop improved crisis and service plans. The goal is at least 3 staffings per patient regardless of whether they are at the CRC that day.



**CHARTS FLAGGED** at the CRC with information about the new crisis plan and who to contact so that the new plan can be implemented.

#### Warnings

Event Date: 1/9/2017

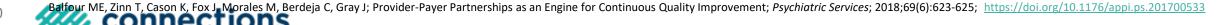
DO NOT DISCHARGE before ART with HOPE DRC, Jerry D

consultation with Cenpatico ▶ more

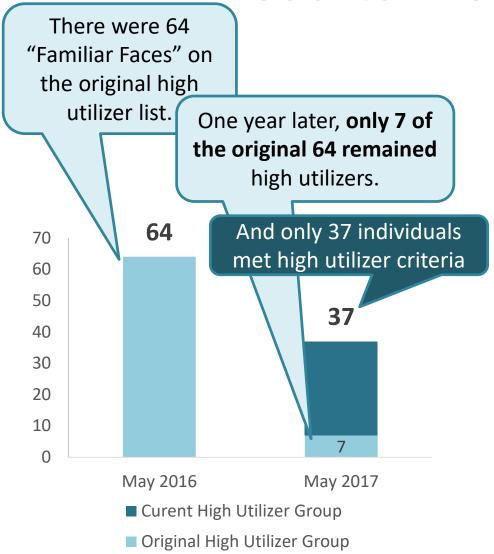








## Results: Fewer "Familiar Faces"



**Case Example:** Ms. X becomes lonely during the weekend, which is a trigger for feeling overwhelmed and suicidal and coming to the CRC. She has a partner who is also enrolled in services.

#### **Individualized Plan:**

- The outpatient provider will proactively do welfare checks on nights and weekends to help plan for triggers that historically result in CRC visits.
- The team will explore working with her partner's team (with consent) in order to assist both in recovery together.
- The CRC will call her clinic Peer Support Specialist immediately upon arrival to reinforce the relationship with her outpatient team and help connect her more quickly with outpatient support.

Results: CRC visits decreased from

14

in Q1 2016 to

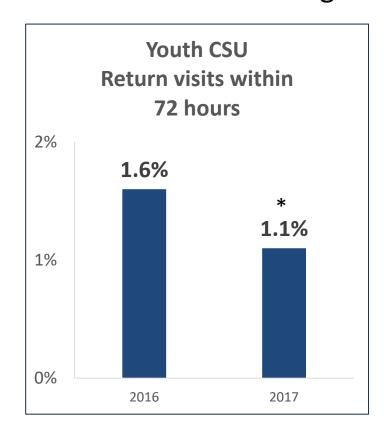
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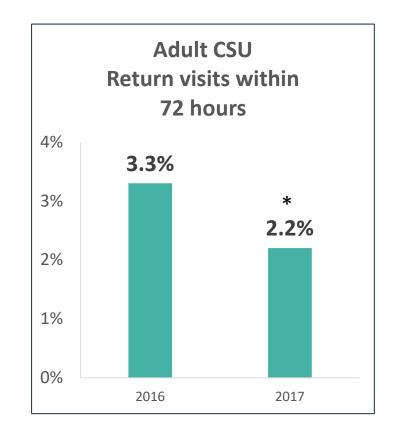
in Q1 2017.

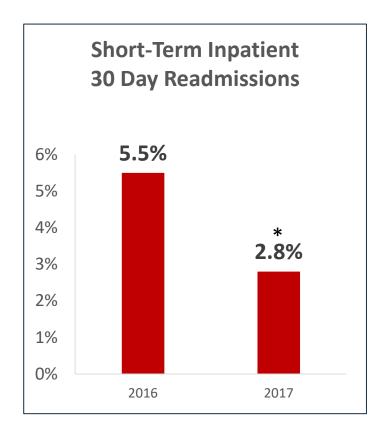


### Results: Reduced Readmissions

#### A significant reduction in readmissions in all units!

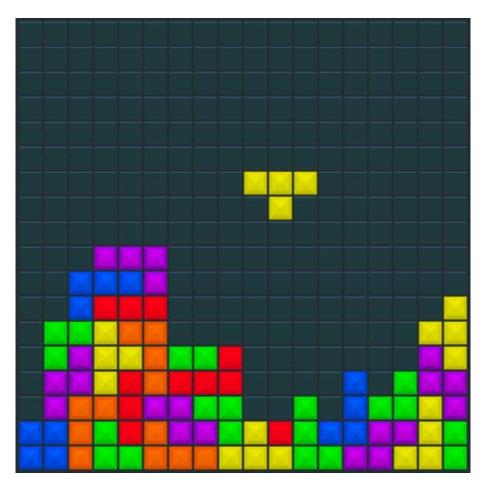






<sup>\*</sup>Comparison of Q1-Q3 (Oct-June) each year. YCSU p < 0.03, ACSU p < 0.02, STIU p < 0.01

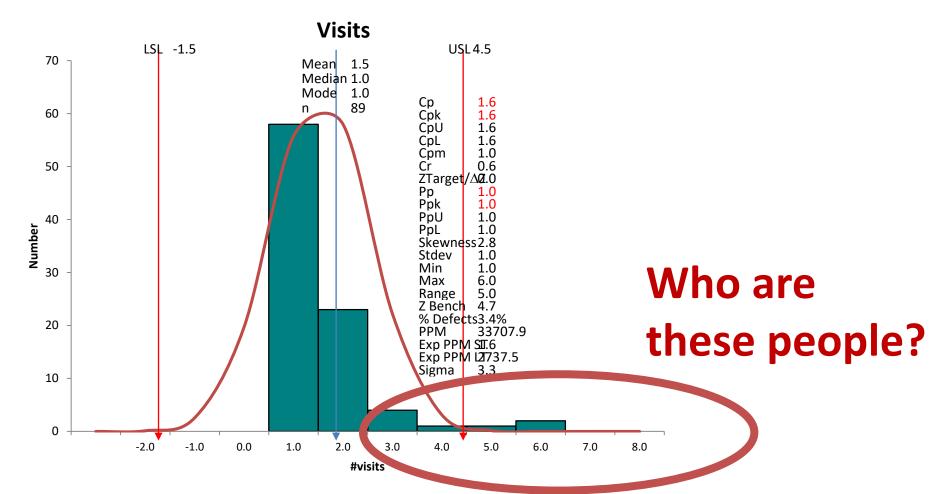
# Putting it all together...



Stakeholders from multiple systems coming together around data dashboards to solve a complex problem.

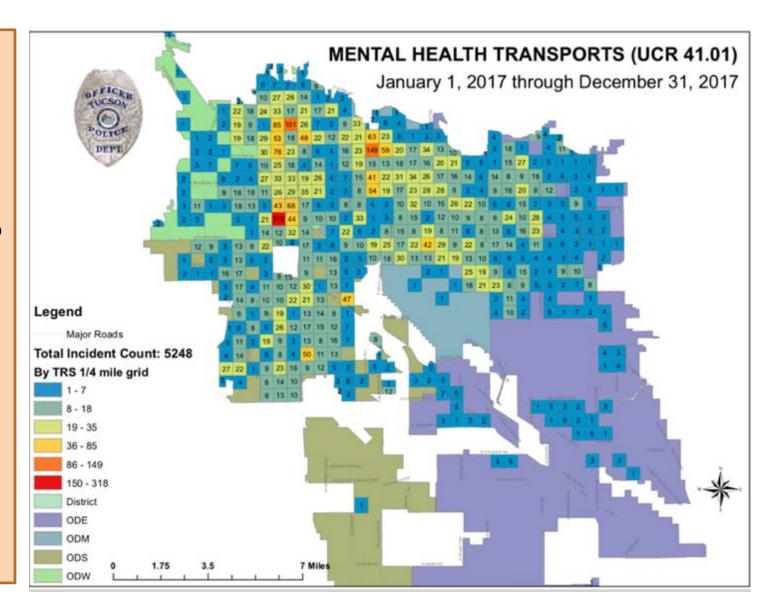
## Example: Repeat revocations to the CRC

(for patients on COT/outpatient civil commitment)



Where are these patients coming from?

Can we target interventions to prevent the need for involuntary law enforcement transports?



Multiagency QI Process to reduce T36 revocations

"The
Group Home
Guy"

**Group Home** 

Crisis Line

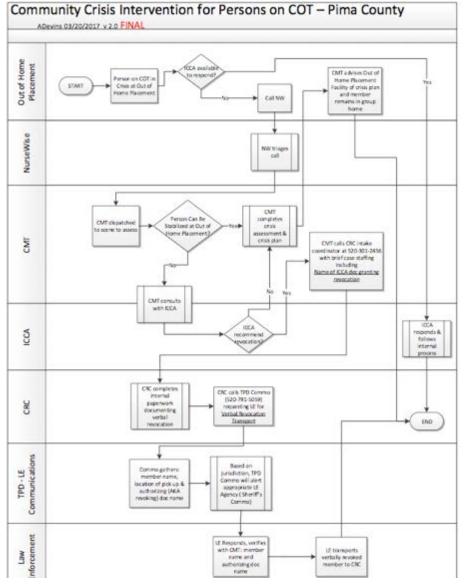
Mobile Crisis Team

**Outpatient Clinic** 

Crisis Response Center

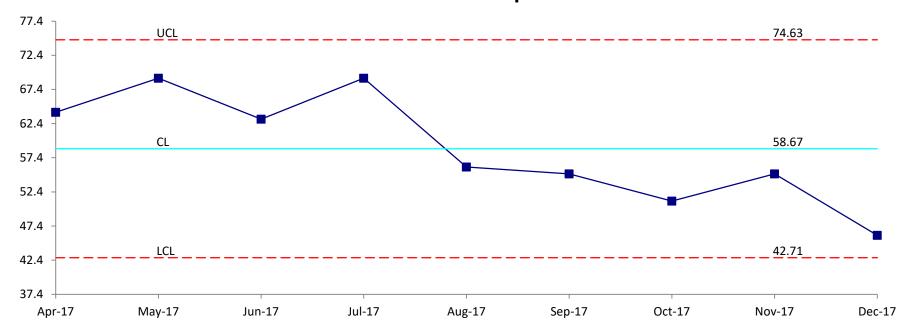
911 Dispatch

Law Enforcement



### Results: Reduced civil commitment revocations

#### **CRC T36 Revocations per month**



### It took a LONG time and LOTS of collaboration to get where we are today.



**Teams** 

TPD >

**201**3

< PCSO

Task Force

2018



2001



## Lessons Learned & Key Ingredients

- The solution is **not** always more inpatient beds!
- Stabilize crisis in the **least-restrictive** setting possible (which also tends to be the least-costly)
- Governance and payment structures to incentivize these programs and services
- Data-driven and values-based decision-making and continuous quality improvement
- Stakeholder collaboration across silos
- **Culture of:** 
  - NO WRONG DOOR
  - "Figure out how to say YES instead of looking for reasons to say no."



# Questions?

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