

**DEPARTMENT OF PUBLIC HEALTH
INFORMATIONAL SURVEY - 2014
HEALTH RESOURCE PLANNING FOR
BEHAVIORAL HEALTH SERVICES**

Response by

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Questions for Response

2. Are there specific services within Mental Health & Substance Abuse that you would like to see studied, and were not already included in the list of services on page 6? Please describe with as much specificity as possible. Please indicate how they can be addressed through health resource planning.

The analytic approach suffers from a significant flaw in that it fails to recognize that the largest single source of ambulatory mental health services is provided by general and specialist physicians in the general medical sector. This has been well known since Regier's classic paper in the Archives of General Psychiatry: The De Facto US Mental Health System June 1978 (attached). This study which showed that the majority of ambulatory mental health services were provided by general physicians has been replicated many times most recently by Olfson JAMA Psychiatry 2014 National Trends in Mental Health Care of Children Adolescents and Adults by Office Based Physicians showing that the majority of mental health care in the physician category is provided by general physicians (attached)

Likewise in the Inpatient sector, MEDPAC reported in June 2010 that for Medicare beneficiaries the majority of admissions occurred in general hospitals including a large number of patients on scatter beds. MEDPAC report to Congress June 2010 (attached)

As such it is essential that the Department and the Health Policy Commission revise its analytic approach to understand the actual distribution of important aspects of care such as outpatient physician services, general hospital services in all settings including scatter beds, consultation to medical care units and Emergency Room care.