

NATIONAL
COUNCIL
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Wellbeing*

CCBHC

Electronic Health Record Optimization or Selection Toolkit



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CCBHC-E National Training & Technical Assistance Center

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Overview

This electronic health record (EHR) system optimization and selection toolkit helps organizations decide whether to enhance their current EHR capabilities or select a new solution. Organizations rely on an EHR system for documentation, billing, prescription drug management, data tracking and more. Understanding the requirements and features of your EHR system will validate how your organization is meeting the Certified Community Behavioral Health Clinic (CCBHC) Certification Criteria, while assessing its technology sophistication and advancements. This toolkit is a resource for organizations as they embark on the journey to operating as a CCHBC or for established CCBHCs looking to assess their current operations and evolve where needed. This toolkit supports organizations in following the requirements set by the [Substance Abuse and Mental Health Services Administration \(SAMHSA\)](#) and leveraging health information technology across the organization. Along with advising and guiding organizations in evaluating their current EHR functionality and capabilities, this resource identifies areas for improvement and provides recommendations for processes, operations, meeting certification criteria and selecting a new solution. It highlights fundamental steps to confirm the current EHR system meets all CCBHC requirements and to implement a new solution where applicable. This toolkit, coupled with the [self-assessment spreadsheet and supporting focused checklists](#), helps highlight areas of strength and those that require attention.

Acknowledgments

This toolkit was developed in 2024 by RSM US LLP in partnership with the National Council for Mental Wellbeing's CCBHC-E National Training and Technical Assistance Center. It reflects industry best practice considerations for operating a technology environment, with an emphasis on the primary technology solutions that support a CCBHC's operation.

We are grateful to the following individuals that assisted with authoring content and providing input and feedback to support the development of this toolkit.

Arvind Rao

Principal, Healthcare Consulting RSM US LLP
Arvind.Rao@rsmus.com

Michael Haas

Manager, Healthcare Consulting RSM US LLP
Michael.Haas@rsmus.com

Rebecca Lebwohl, MBA

Associate, Healthcare Consulting RSM US LLP
Rebecca.Lebwohl@rsmus.com

Blaire Thomas, MA

Project Manager II, CCBHC-E National Training and Technical Assistance Center, National Council for Mental Wellbeing

Clement Nsiah PhD, MS

Project Director, CCBHC-E National Training and Technical Assistance Center, National Council for Mental Wellbeing

Renee Boak, MPH

Lead Consultant, CCBHC-E National Training and Technical Assistance Center, National Council for Mental Wellbeing

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EHRs and Their Role in CCBHC Operations

The electronic health record (EHR) system is a key ingredient to provide comprehensive and efficient care to people receiving services in the community. Between coordination of care, documentation, and data, the EHR system can reduce — or, in many cases, remove — the manual processes, improve staff efficiencies, and enhance quality care outcomes. CCBHCs are required to meet specific criteria to support their operations and delivery of comprehensive behavioral health services. Many of these requirements work through or involve an EHR system, so it is crucial to have a strong centerpiece that coordinates all the services for the organization.

Key Criteria for CCBHC Technology Management

The following outlines the CCBHC Certification Criteria specific to health information technology (SAMHSA, 2023) (SAMHSA, 2024). Access the complete list of criteria at [samhsa.gov](https://www.samhsa.gov).

Health Information Technology CCBHC Criteria

Criterion 1.A: General Staffing Requirements	1.a.2: The staff (both clinical and nonclinical) is appropriate for serving the consumer population in terms of size and composition and providing the types of services the CCBHC is required and proposes to offer. Each staff member has been assigned job responsibilities within the CCBHC and, within their role, will have access to certain features/data points in the technology solutions. When adding technology to an organization, leaders will want to set up policies and protocols, so users have access to the appropriate information to complete their job tasks while securing data and features that are not applicable to those roles.
Criterion 2.A: General Requirements of Access and Availability	2.a.5: Utilize telehealth/telemedicine, and online treatment services to ensure consumers have access to all required services.

<p>Criterion 3.B: Care Coordination and Other Health Information Systems</p>	<p>3.b.1: The CCBHC establishes or maintains a health information technology system that includes, but is not limited to, electronic health records.</p>
	<p>3.b.2: The CCBHC uses its secure health IT system(s) and related technology tools, ensuring appropriate protections are in place, to conduct activities such as population health management, quality improvement, quality measurement and reporting, reducing disparities, outreach, and for research. When CCBHCs use federal funding to acquire, upgrade, or implement technology to support these activities, systems should utilize nationally recognized Health and Human Services (HHS)-adopted standards, where available, to enable health information exchange. For example, this may include simply using common terminology mapped to standards adopted by HHS to represent a concept such as race, ethnicity, or other demographic information. While this requirement does not apply to incidental use of existing IT systems to support these activities when there is no targeted use of program funding, CCBHCs are encouraged to explore ways to support alignment with standards across data-driven activities.</p>
	<p>3.b.3: The CCBHC uses technology that has been certified to current criteria under the [Office of the National Coordinator for Health Information Technology (ONC)] <u>Certification Program</u> for the following required core set of certified health IT capabilities that align with key clinical practice and care delivery requirements for CCBHCs:</p> <ul style="list-style-type: none"> ■ Capture health information, including demographic information such as race, ethnicity, preferred language, sexual and gender identity, and disability status (as feasible). ■ At a minimum, support care coordination by sending and receiving summary of care records. ■ Provide people receiving services with timely electronic access to view, download, or transmit their health information or to access their health information via an [application programming interface (API)] using a personal health app of their choice. ■ Provide evidence-based clinical decision support. ■ Conduct electronic prescribing.

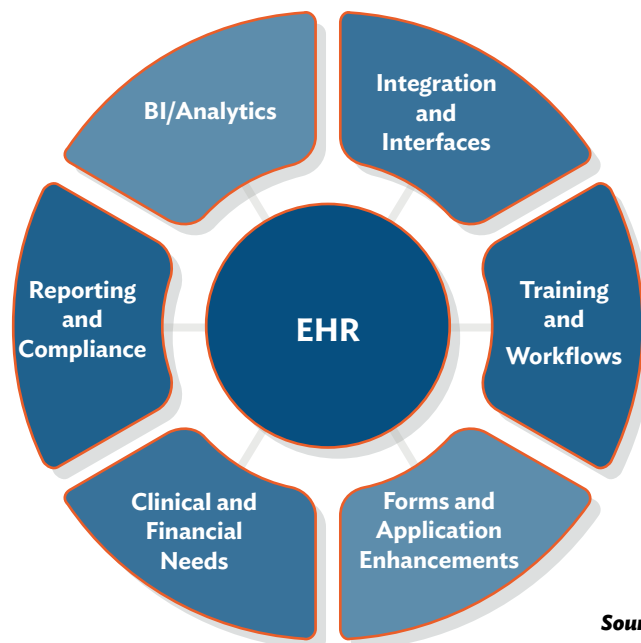
	<p>3.b.4: The CCBHC will work with [Designated Collaborating Organizations (DCOs) (National Council for Mental Wellbeing, 2016)] to ensure all steps are taken, including obtaining consent from people receiving services, to comply with privacy and confidentiality requirements. These include, but are not limited to, those of HIPAA (Pub. L. No. 104-191, 110 Stat. 1936 (1996)), 42 CFR Part 2, and other federal and state laws, including patient privacy requirements specific to the care of minors.</p>
	<p>3.b.5: The CCBHC develops and implements a plan within two years from CCBHC certification or submission of attestation to focus on ways to improve care coordination between the CCBHC and all DCOs using a health IT system. This plan includes information on how the CCBHC can support electronic health information exchange to improve care transition to and from the CCBHC using the health IT system they have in place or are implementing for transitions of care. To support integrated evaluation planning, treatment, and care coordination, the CCBHC works with DCOs to integrate clinically relevant treatment records generated by the DCO for people receiving CCBHC services and incorporate them into the CCBHC health record. Further, all clinically relevant treatment records maintained by the CCBHC are available to DCOs within the confines of federal and/or state laws governing sharing of health records.</p>
<p>Criterion 5.A: Data Collection, Reporting and Tracking</p>	<p>5.a.1: The CCBHC has the capacity to collect, report, and track encounter, outcome, and quality data, including, but not limited to, data capturing: 1) characteristics of people receiving services; 2) staffing; 3) access to services; 4) use of services; 5) screening, prevention and treatment; 6) care coordination; 7) other processes of care; 8) costs; and 9) outcomes of people receiving services. Data collection and reporting requirements are elaborated below and in Appendix B. Where feasible, information about people receiving services and care delivery should be captured electronically, using widely available standards.</p>
	<p>5.a.2: Both Section 223 Demonstration CCBHCs, and CCBHC-Es awarded SAMHSA discretionary CCBHC-Expansion grants beginning in 2022, must collect and report the clinic-collected quality measures identified as required in Appendix B. Reporting is annual and, for clinic-collected quality measures, reporting is required for all people receiving CCBHC services. CCBHCs are to report quality measures nine months after the end of the measurement year as that term is defined in the technical specifications. Section 223 Demonstration CCBHCs report the data to their states and CCBHC-Es that are required to report quality measure data report it directly to SAMHSA.</p>

Why Organizations Need an EHR System Assessment

The many EHR systems in today's marketplace provide several capabilities and features. This places pressure on an organization to make sure it is complying with all the regulations and requirements to become or remain a CCBHC. This is why a periodic or annual assessment of an organization's EHR system setup is important. Alignment of technology and organizational needs, changes in policies and regulations, data and reporting requirements, and increased pressure to do more with less are all aspects C-suite leaders and organizations must discuss to determine if they have the best solution. When a system no longer meets an organization's needs, the question becomes whether to optimize the current system or select a new one. Organizations develop a team or hire outside expertise to develop a plan, assess the best options and implement a process for enhancing the current solution or choosing a new system. One key component in making this decision is completing an organizational self-assessment, which is discussed in the next section. The results and information obtained from a self-assessment can outline the gaps between the organization's needs and the current system functionalities. Leadership will determine whether this gap will be bridged by optimizing the current solution or evaluating prospective systems.

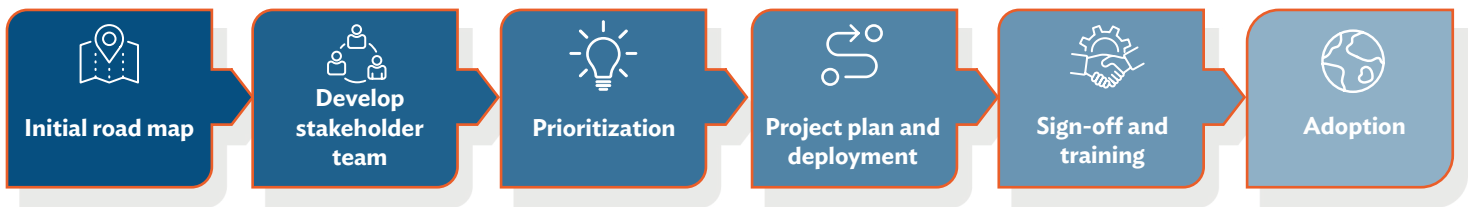
Before jumping into the self-assessment, it's important to understand what it means to optimize an organization's current EHR system. Surprisingly, switching on a few configurations (e.g., using a dashboard or adding a few reports), or purchasing an additional package for the current solution (e.g., additional documentation templates, billing features, capabilities for tracking patient insurance and eligibility benefits), may be exactly what your organization needs. On the other hand, your organization may have already considered every option with your current solution and is ready to purchase a new one. When evaluating the next step of whether to optimize or select a new system, it is important that organizations:

- Categorize and elaborate on desired needs based on business objectives.
- Identify high-level solution setups, architecture and data flows.
- Make decisions based on gathered information.
- Identify the pros and cons of different paths along with the impacts on remaining or becoming a CCBHC.
- Outline an actionable road map for execution.
- Align with organizational strategy.



Source: RSM

EHR System Optimization



EHR system optimization refers to evaluating the current solution and identifying opportunities for improvement (e.g., documentation templates, patient data collection, pain points using the technology to serve the client). It can be as simple as purchasing an extension to your current subscription to access additional functionality for special customization. This is important because the organization’s stakeholders should determine if investing more money in the current solution is going to move the organization forward or be a bandage satisfying a need for a short time. Whether an organization plans to optimize or select a new solution, there are key steps to support the end decision. In the end, the EHR system needs to facilitate person-centered treatment planning (e.g., capturing recovery goals and life goals in the person’s own words, integrated wellness recovery plans, and psychiatric advance directives) to ensure continued quality of care and tracking mechanisms for intervention, where applicable.

Starting with an initial road map, the organization must identify its mission(s). Are the organization’s people, processes and technology aligned with this mission(s)? Where does the organization see opportunities and where does it want to be in a few years? These are all key questions for framing the initial road map. As the organization builds out its road map, leveraging the self-assessment and supporting checklists, it will ensure it is aligned with the CCBHC criteria. The road map will be influenced by the stakeholder team that encompasses expertise across the organization (e.g., clinical, finance, IT and senior leaders) as well as by patient feedback. Having perspectives from across the organization on the stakeholder team confirms that all operations matter and will play a role in the decision to optimize the solution.

Once the team is assembled, discussions will begin about the current EHR system’s capabilities and limitations, the organization’s desired needs, and staff perspectives, while using the self-assessment and checklists to drive the conversation. If the system meets all the organization’s needs and addresses areas of concern, additional training and assistance refresher may benefit the staff. Otherwise, the stakeholder team develops and prioritizes the list of needs not currently offered in the EHR system. Prioritizing and aligning with CCBHC requirements is important because though every item on the list has purpose and value, some have more significance and impact on an organization to be the first areas of focus. These items should also account for any CCBHC requirements regarding EHR system compliance. There will be a cost associated with these priorities and a level of effort that will play a role in the final decisions.

After developing a priority list, the stakeholder team assigns a project team — whether formed among the stakeholders or hired as an external consultant — to drive the project to completion. This project team will be responsible for communicating with the vendor to address the organization’s needs, develop a project plan, obtain a budget, and complete the project within a determined time frame. This is an important phase of the optimization because an organization has a fixed budget, and it is key to clearly articulate the priority items to the vendor and confirm how long it will take to complete. The organization either assesses that the vendor can complete the desired needs through the baseline setup or customizations, or the vendor may say they cannot complete the request. These critical vendor conversations could alter the course of the whole project, where the team may have to pivot to select an entirely different system or reorder priority items and expectations.

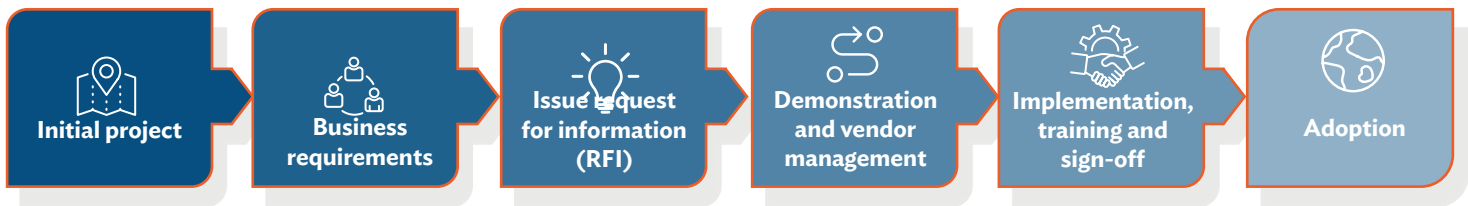
Depending on the final decision and budget, the organization should reach out to a trusted partner or other CCBHCs for advice to navigate the vendor process. Leveraging information from peers, other CCBHCs with experience, or a trusted consultant will give an organization additional confidence that it is selecting the right vendor and help it better understand the process. Each vendor may have all the resources and customizations needed to complete the updates, or there may be a combination of vendor and organizational resources for completing the tasks. Both scenarios are common, where it will come down to time and cost. An organization wants these requested items available as soon as possible, but a vendor may not have the resources to meet a specific timeline. It may also cost more to have the vendor's resources complete all the tasks, so an organization may take on some of that responsibility and work collaboratively to meet the desired timeline.

The project team will establish weekly meetings and benchmarks (e.g., whether the project team completed its weekly tasks, the project is meeting timeline expectations, the vendor completed the requested tasks for sign-off) to make sure the plan is on track and on time. Scope creep and challenges may arise along the way — especially if customizations were requested — where an organization may need to pivot. However, establishing clear benchmark dates and spending time articulating the desired requests at the beginning of the project should reduce any downstream issues. The project team should also ask the vendor for demos to see the requested features and how they function before approving and moving forward.

Once the project budget and timeline are agreed upon and the organization's stakeholders have tested and validated that the functionality meets their required needs, the vendor and organization sign off on the project. Training will begin with the rest of the organization's staff to get everyone up to speed on the recent changes. This training can be led by the vendor or the organization's project team.

With change, there is always going to be some resistance and an adoption period. The organization's stakeholders need to factor this into their plan. With any system change, there will be a ramp-up period where staff will not be functioning as quickly as it was before the updates. It will take some time to learn all the new processes. The stakeholder and leadership focus is on the end goal — as long as the organization is moving in the right direction, the speed and productivity will surpass the previous expectation.

EHR System Selection



Organizations that have a sufficient EHR system and the ability to enhance their current solution to meet their needs and the CCBHC requirements will go the optimization route. Organizations that cannot improve their current EHR system (e.g., due to vendor limitations or the solution not offering the desired features) will turn to the selection process. Each EHR system has the standard functions — intake, charting, billing and reporting — but some solutions take each of these features to a different level. When starting the selection process, the organization should determine why it needs a new EHR system as well as how the EHR system will help it improve and meet the CCBHC requirements.

As with optimization, when initiating the selection process, the project team should always consider the organization’s mission(s). Again, ask whether the organization’s people, processes and technology are aligned with this mission(s) and where it sees opportunities and where it will be in the next few years. These key questions will frame the initial road map. While developing this road map, the organization needs to develop a stakeholder team that encompasses expertise across the organization. Having these differing perspectives validates that all operations matter and will help identify the business requirements needed in the new solution. The organization can then develop its internal project team or can bring in a third party to lead this initiative.

The project team will meet with different leaders and managers throughout the organization to determine if there are business gaps and limitations within the current solution, using the provided self-assessment and checklists to drive the conversation. Upon completing these meetings and discussions, the project team will have gathered all the business requirements to select the next EHR system. The team will analyze these requirements to determine priority, cost, and impact on the organization.

Following its analysis, the project team will initiate a request for information (RFI). This is a proposal shared publicly for EHR vendors to determine if their solution is something that will benefit the organization. Multiple vendors will respond to the RFI, and the project team will determine which vendors to further speak with.

The project team will work with each vendor to see a demo of their EHR system and hold discussions about the RFI and the organization’s needs. A demo will include a walkthrough of the solution in a forum that allows the organization to ask the vendor questions and determine if the features will meet its expectations. Some vendors will be able to meet all the proposed business needs, some will partially have the business capabilities and require customization for others, and some will not be able to proceed after the demo.

Referencing the self-assessment and checklists, the project team then evaluates each vendor to make sure all pain points and gaps are accounted for, which one will best meet the organization’s needs, what the implementation timeline will look like and how much it will cost. These are all key factors that the

project team and the organization need to agree on before proceeding. Organizations that are or want to become a CCBHC must also refer to current compliance guidelines and checklists to ensure they'll have the appropriate features and capabilities (e.g., data sharing, appropriate documentation, reporting, and ability to communicate with patients and DCOs).

During this process, organizations should also ask for references from peers that the EHR vendors have previously worked with to learn more about their solutions, ability to meet timelines, and customer service pre-/post-implementation.

Once a vendor is selected, the project team will coordinate and oversee the timeline and approve benchmarks to make sure the implementation is moving forward. The organization may allocate resources to focus on the implementation, which is important for maintaining normal operations. Pulling staff away from day-to-day tasks can be a challenge and the necessary expertise may be outside of what the organization currently has. Part of the project team's planning is to account for these resources and their time dedicated to the project while ensuring there is no burnout or quality loss.

The project team will establish weekly meetings and benchmarks for tracking progress. Scope creep and challenges may arise along the way — especially if customizations were requested — where an organization may need to pivot. However, establishing clear benchmark dates and spending time articulating the desired requests at the beginning of the project should reduce any downstream issues.

Once the project budget and timeline are agreed upon and the organization's stakeholders have tested and validated that the functionality meets their required needs, the vendor and organization sign off on the project. Training will begin with the rest of the organization's staff to get everyone up to speed on the recent changes. This training can be led by the vendor or project team.

With change, there is always going to be a ramp-up period, operationally and financially. The stakeholders need to plan for this period when the organization will function at a slower pace while adopting the new processes. Identified benchmarks and time frames will be established so the organization can gauge its progression and optimal performance, using these metrics to show how the organization has improved. The stakeholder and leadership focus is on the end goal — as long as the organization is moving in the right direction, the speed and productivity will surpass the previous expectation.

EHR System Self-assessment Toolkit

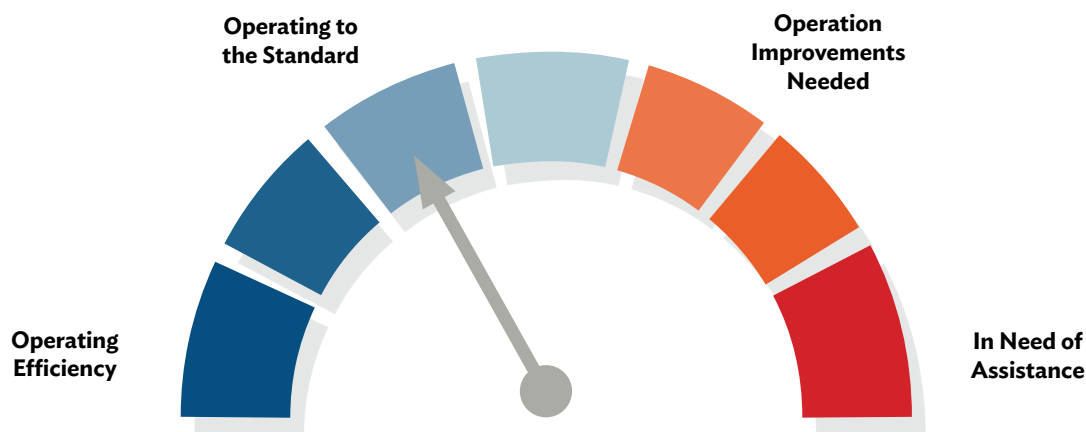
Self-assessment process

Now that you understand how to optimize or select an EHR system to guide your organization through improvements and compliance, it is recommended your organization complete the [EHR system self-assessment](#) to identify the best route. The self-assessment identifies a list of industry best practices and CCBHC-compliant questions for which your organization will respond with a score of 1, 2 or 3 based on the outlined descriptions. An organization and stakeholders can complete the assessment and checklists together, or an organization can have its key stakeholders complete the assessment individually, averaging the scores to determine the areas of importance and need. The sum of your scores will categorize your organization into a bracket with next-step guidance and recommendations for either optimizing your current EHR or selecting a new system.

Then, it is time for your organization to devise a strategy, prioritize items, and execute. Once the items are prioritized, the organization or stakeholders will research or consult a third party to determine a plan of action and a budget to complete these tasks. Based on this information, an organization can choose to proceed with a system optimization or choose to purchase a new solution altogether. Your organization can take another self-assessment at any time in the future to determine progress and if additional focuses are needed.

Applying self-assessment results for EHR system optimization or selection

Remember that assessment scores are meant to guide your EHR improvement journey.



Once the decision to optimize or select a new option is made, it is time to evaluate the budget, planning, and resources required for successful transformation. The following shares examples of how an organization should prioritize its EHR system journey by understanding the levels of effort, tasks and additional focus points when adopting and/or evaluating technology solutions.

Planning and Execution



Technology planning and budgeting

Selecting an EHR system is a big financial investment. Your leadership should consider multiple options by first gathering key requirements for the organization and seeing which solutions align with its goals. When evaluating vendors, it may be helpful to request references from other CCBHCs that have used their services to get feedback on implementation and post-implementation support. Once the vendor has been selected, your organization should develop an IT strategic plan for how this new solution will align with, replace, or improve your current state. It is important to keep in mind that all EHR system purchases must be ONC-certified according to CCBHC criteria guidelines for the appropriate use of grant funds.

Along with your selection, the organization's leaders need to formulate a strategic budget that accounts for all costs of the implementation, including staff training, resources, and additional funds in case anything goes unplanned with the project. Having a timeline and benchmarks established early on will help an organization determine if it is on track for achieving its goal.

Upon completion of the project and solution implementation, your organization should have a plan to measure return on investment (ROI) and validate the correct solution was purchased. ROI can be determined by improved financials, quality metrics and experiences of people served.



Action plan and recommendations

Now that your organization has a defined budget and identified the solution to purchase, you should take the gaps discovered in the self-assessment and form task teams to aid the project team. These teams have expertise in specific functions (e.g., intake, care coordination, billing, and reporting) and can brainstorm ideas and help develop workflows for how the solution will be used in their departments.

Each piece of the EHR system implementation is unique, with some requiring more effort and time than others. The project managers and teams must recognize these time parameters and efforts so that the implementation can keep moving forward. If possible, determine what tasks and portions can be completed simultaneously so there is less downtime, and the project can be completed faster.

No implementation can be completed without resources. Your staff is one of the most important pieces to successful implementation. Your project team must be able to manage resources so that the organization's daily operations are not impacted by the project. There needs to be a balance between operations and project focus, but if this is a challenge, additional support from a contractor or third-party vendor can be helpful. The last thing you need is for staff to become resistant or burnt out from work overload, and the project running into roadblocks or worse.



Annual training and development initiatives

When updating or implementing any EHR system, there is going to be a learning curve for the organization. Building out a timeline and training plan can help set expectations for adoption and where your organization sees itself post-implementation. Training on the solution should be a culture move to ongoing learning. The organization should structure a cadence of learning and appoint super users to train any new hires or those moving into different roles internally.



Staff training and competency

Understanding a new EHR system requires continuous education and training to keep skills sharp as new releases and enhancements to the product roll out. Strong trainers and leaders are essential for efficient and effective staff trainings. Not everyone is going to be a trainer. The organization's leadership needs to assess its staff's skill sets and capabilities and designate users into roles that will help with the EHR system's optimization or adoption. Understanding the knowledge and expertise of your staff will also enable you to assess where your organization has knowledge gaps that could be supported by a contractor or third-party vendor.



Future technology road map

The industry is constantly attracting new vendors offering improved EHR system to better patient care. You should be aware of these advancing solutions and understand how they can help your organization. Every organization can succeed in adopting technology and advancing. It is vital your leadership has someone who is technologically savvy and continually aware of the available EHR systems that could best fit your organization.



Leveraging external resources

It is important to understand your organization's limitations and leverage external resources where necessary. An organization's EHR system transformation can be a large undertaking and will require dedicated workgroups and resources. If your organization does not have the technical resources for successful implementation, you may consider reaching out to the National Council, or consulting services such as RSM, for assistance. The National Council will publish additional technology toolkits to serve as guides on certain topics.

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