Developing CCBHC Certification Requirements and Process

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CCBHC S-TAC

CCBHC State Technical Assistance Center

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Today's Presenter

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Learning Objectives

By the end of this session, participants will be able to:

- Conceptualize how the needs assessment leads to goal and scope of services development that guides establishing certification requirements and processes in the state.
- Understand the general concepts of certification for CCBHC programs.
- Understand the work-flow of certification requirements and process development.

Agenda

Foundation for Certification

- Needs Assessment → Goal Setting → Certification Standards

Developing Certification

- Requirements
- Process

Foundation for Certification

Golden Thread

Assessment

Diagnosis

Goals

Interventions

Evaluation

CQI

Recommended State Needs Assessment

Community Needs Assessment

Similar elements and processes used to complete Community Needs Assessments can be helpful tools and frameworks for a state needs assessment, just on a grander scale.

Community Needs Assessments are specifically outlined in the CCBHC Criteria https://www.samhsa.gov/sites/default/files/ccbhc-criteria-2023.pdf

CCBHC Criteria Program Requirements

1: Staffing

2: Availability and Accessibility of Services

3: Care Coordination

4: Scope of Services

5: Quality and Other Reporting

6: Organizational Authority, Governance and Accreditation

Community Needs Assessment Applications

Section	Criteria	Description
Staffing	**1.a.2**	The staff (both clinical and non-clinical) is appropriate for the population receiving services, as determined by the community needs assessment.
	1.a.3	The chief executive officer (CEO) of the CCBHC, or equivalent, maintains a fully staffed management team as appropriate for the size and needs of the clinic, as determined by the current community needs assessment and staffing plan.
	1.b.2	The staffing plan is informed by the community needs assessment and includes clinical, peer and other staff.
	1.d.4	Prior to certification, the needs assessment will inform which languages require language assistance, to be updated as needed.

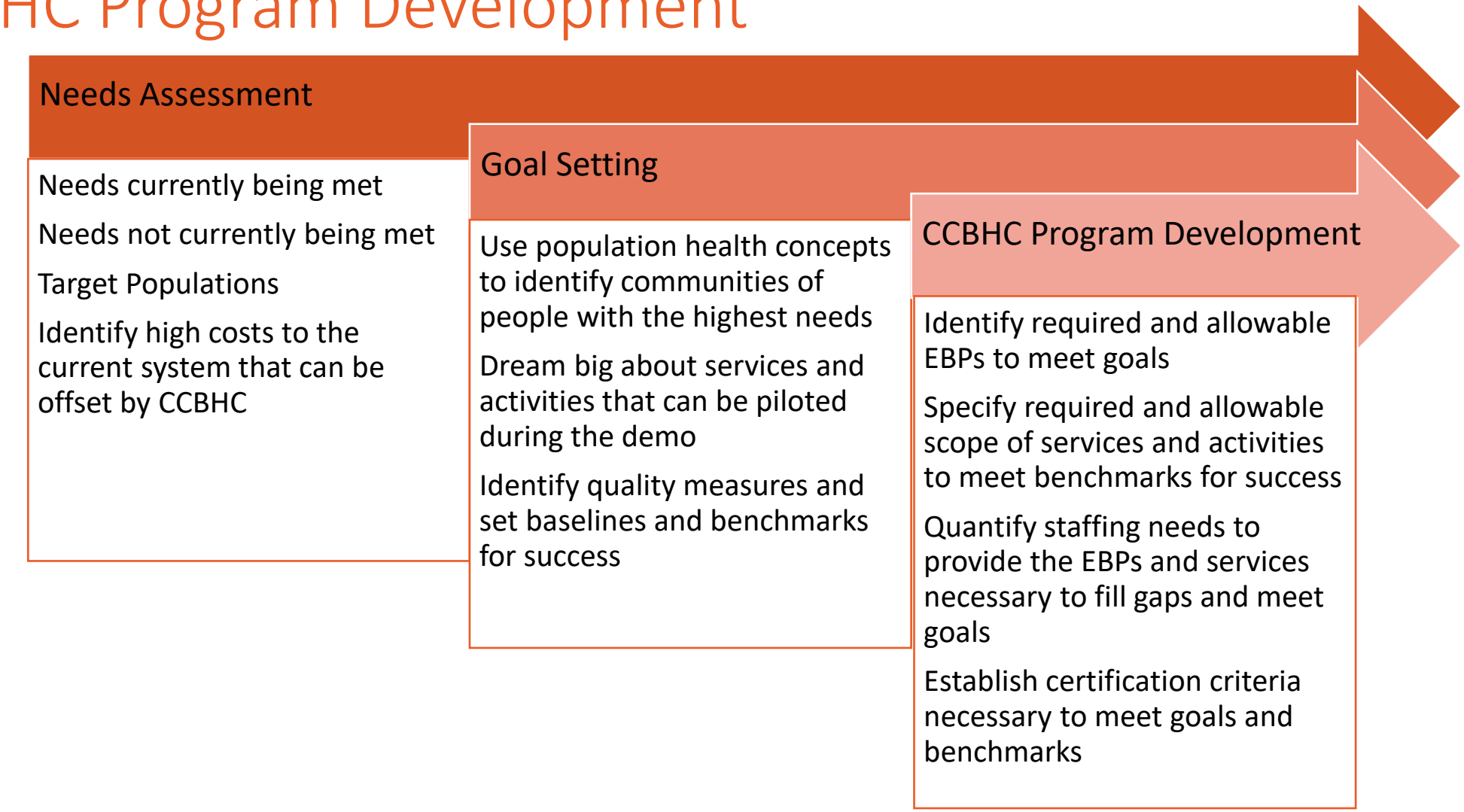
Community Needs Assessment Applications cont.

Section	Criteria	Description
Availability and Accessibility of Services	**2.a.2**	Informed by the community needs assessment, the CCBHC ensures that services are provided during times that facilitate accessibility and meet the needs of the population served by the CCBHC, including some evening and weekend hours.
	2.a.3	Informed by the community needs assessment, the CCBHC provides services at locations that ensure accessibility and meet the needs of the population to be served, such as settings in the community and – as appropriate and feasible – in the homes of people receiving services.
	2.a.6	Informed by the community needs assessment, the CCBHC conducts outreach, engagement and retention activities to support inclusion and access for underserved individuals and populations.

Community Needs Assessment Applications cont. 2

Section	Criteria	Description
Care Coordination	**3.c.3**	The CCBHC has partnerships with a variety of community or regional services, supports and providers. CCBHCs may develop partnerships with [the entities listed in the criteria] based on the population served, the needs and preferences of people receiving services and/or needs identified in the community needs assessment.
Scope of Services	**4.c.1**	The CCBHC provides crisis receiving/stabilization services that must include, at minimum, urgent care/walk-in mental health and SUD services for voluntary individuals. Walk-in hours are informed by the community needs assessment and include evening hours that are publicly posted.
	4.f.1	The CCBHC or the DCO must provide evidence-based services using best practices for treating mental health and SUDs across the lifespan, with tailored approaches for adults, children and families. (• Note: Based upon the findings of the community needs assessment as required in program requirement 1, certifying states must establish a minimum set of evidence-based practices required of the CCBHCs.)

Needs Assessment: Role in Goal Setting & CCBHC Program Development



Needs Assessment: Goals for the CCBHC Program

Example: Higher suicide rate for veterans

Needs Assessment

Needs currently being met: reduction in overall suicide rate due to implementation of Zero Suicide

Needs not currently being met: no reduction in suicide rate for veterans

Target Community: veterans with Major Depressive Disorder

Goal Setting

Use population health concepts to identify communities with the highest needs

Dream Big about services and activities that can be piloted during the demo: research effective methods

Identify quality measures and set baselines and benchmarks for success: Reduce veteran suicide rate by 20%

CCBHC Program Development

Identify required and allowable EBPs to meet goals: Zero Suicide, Veteran Peers, etc.

Specify required and allowable scope of services and activities to meet benchmarks for success

Quantify staffing needs to provide the EBPs and services necessary to fill gaps and met goals

Establish certification criteria necessary to meet goals and benchmarks: require EBP for veteran suicide

Population Health Management for States

- Clinics have population health management requirements in the criteria.
- States can build on the clinic requirements and plan for state level approaches to increase access to care for everyone.
- States can consider cost neutrality and offsetting system costs within the population health goals for the CCBHC program.
- Including these concepts in Needs Assessment allows for inclusion of other state departments (education, corrections, etc.) in the early ground setting of CCBHC to increase buy-in.

Developing Certification

States' levers of control

- **Certification of CCBHCs (only state-certified clinics may receive PPS)**
- Choice of PPS-1 or PPS-2 (and now PPS-3 or PPS-4) models
  - In PPS-1: whether to use QBPs (QBPs required in PPS-2)
  - In PPS-2: which special population groups will receive distinct PPS
- Quality bonus payment thresholds, amounts, reporting requirements (within parameters of CMS guidance)
- Review of clinics' cost reports
- Method for determining yearly rate adjustments
- Frequency of rebasing
- How to address payment in managed care context

Collaborative CCBHC Development

- Confirm both Behavioral Health Policy and Medicaid staff's engagement in the entire CCBHC development process.
- Establish regular, broad stakeholder meetings that include:
  - Prospective CCBHCs, prospective DCOs, state offices connected to the BH system (such as corrections, education, housing, health, etc.), peers, people with lived and living experience, social service agencies and any other people or organizations that will be impacted by the CCBHC program.
- Consider establishing multiple, themed work groups that include prospective CCBHCs' pertinent staff and their local associations.
  - Services/Clinical
  - Data/Evaluation
  - Payment/PPS

Collaborative Certification Development

- Utilize the established, regular broad stakeholder meetings to understand and gather feedback about Needs Assessment results, establishing goals and developing general scope of services concepts
- Utilize the established, regular Services/Clinical-specific work groups that include prospective CCBHCs to collaboratively draft the specifics of the scope of services
- Utilize the established, regular Services/Clinical-specific work groups that include prospective CCBHCs to collaboratively draft the certification standards and process

CCBHC Criteria Requirements

CCBHC Criteria Section	Key Requirements
Staffing	• Community Needs Assessment and staffing plan in response are required • CCBHC Project Director and Psychiatrist as Medical Director, MAT prescriber, MH and SU providers, peers, staff with veteran experience • Training must be aligned with CLAS standards and address: Cultural competency; Person-centered and family-centered, recovery-oriented, evidence-based and trauma-informed care; Primary care/behavioral health integration; and more
Availability and Accessibility of Services	• Timely access to care (triage system to identify if crisis, urgent, routine) • Telehealth capabilities • CCBHCs must serve anyone who expresses a need for SU or MH care, including providing developmentally appropriate care for children, youth, and families, regardless of ability to pay or place of residence • Access to crisis management services, including a mobile crisis response within 3 hours
Care Coordination	• CCBHCs coordinate care across the spectrum of health services, including access to high-quality physical health and behavioral health care, as well as social services, housing, educational systems, and employment opportunities • CCBHC has a Health IT system that includes an EHR

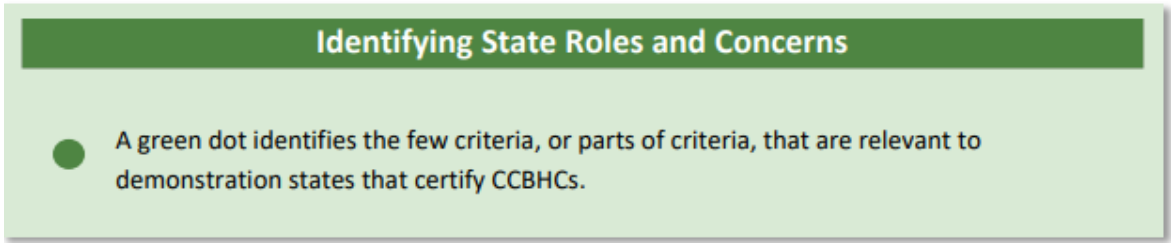
Certified Community Behavioral Health Clinic (CCBHC) Certification Criteria Updated March 2023 (samhsa.gov)

CCBHC Criteria Requirements

CCBHC Criteria Section	Key Requirements
Scope of Services	• 9 required services • CCBHCs directly deliver the majority (51% or more) of **encounters** across the required services (excluding Crisis Services) rather than through DCOs • Crisis receiving/stabilization services that includes at minimum, urgent care/walk-in mental health and substance use disorder services • CCBHCs provide ASAM outpatient Levels 1 and 2.1 (IOP) and include treatment of tobacco use disorders • Primary care **screening** (not services) • Serving veterans and members of the armed forces
Quality and Other Reporting	• 5 required CCBHC collected Measures (+5 optional) • 13 required State collected Measures (+2 optional) • CQI
Organizational Authority, Governance & Accreditation	• CCBHCs must be Nonprofits, Part of local government behavioral health authority OR Under the authority of Indian Health Service • Meaningful participation of people with lived/living experience or family members (51% of board) • CCBHCs must be licensed, certified or accredited to provide MH/SU services

Certified Community Behavioral Health Clinic (CCBHC) Certification Criteria Updated March 2023 (samhsa.gov)

State Discretionary Items



- Staffing requirements
- Community Needs assessment requirements
- Linguistic and treatment needs of the populations to be served
- Service area definition
- Directly provided services vs DCOs and a measurement system (51% of encounters)
- Evaluation and treatment planning element requirements
- State sanctioned crisis system
- Alternatives to 51% board participation by people served/family members

Certified Community Behavioral Health Clinic (CCBHC) Certification Criteria Updated March 2023 (samhsa.gov)

Certification Opportunities

In response to the aggregated Community Needs Assessment results:

- Advance quality of care through implementation of state-determined Evidence-Based Practices
- Launch new service lines to meet community needs
- Enhance care for all populations in community based settings
- Advance Medicaid agency behavioral health care goals
- Improve coordination of care for people served in the CCBHC who also have primary care needs
- Include previously state-funded outreach efforts and initiatives as allowable activities included in the CCBHC cost report
- Working across silos: collaborating with other State divisions and departments and building a collaborative system of care (community partnerships)

Care Coordination Partnership Opportunities

Schools

- Provide direct services on site in schools or plan to do so
- Engage in suicide prevention efforts targeted to children/youth
- Provide Mental Health First Aid training to middle or high school students, teachers and staff
- Coordinate with schools to develop consistent service and support plans that span the school and community

Law Enforcement & Criminal Justice

- Participate in mental health court, drug court, or veterans' court
- Train law enforcement or corrections officers in Mental Health First Aid, CIT, or other mental health/SUD awareness training
- Provide pre-release screening, referrals, or other activities to ensure continuity of care upon re-entry to community from jail
- Initiated data or information sharing with law enforcement or local jails to support improved collaboration
- Embed a clinician or peer specialist with law enforcement officers responding to mental health/SUD calls
- Provide telehealth support to law enforcement officers responding to mental health/SUD calls

Other

- SUD residential treatment facilities
- Withdrawal management facilities
- MAT providers for SUD
- Homeless shelters
- Housing agencies
- Employment services/supported employment
- Consumer operated/peer service provider organizations

Incorporate Decertification

- Defining the standards for decertification clarifies the relative importance of criteria requirements
- Consider items that indicate urgency for decertification rather than just allowing a certification to lapse at the end of the certification period
- Identify “red flags” and “hard stops” that indicate a CCBHC is not meeting requirements
- Build in “Corrective Action Plan” systems to provide a challenged CCBHC an opportunity for course correction

Define a process for decertification

- Timelines
- Payment changes
- Potential Appeals process

Building a Quality Assurance program

Identify monitoring opportunities

- Regular collaborative meetings with CCBHCs
- Site visits
- Peer review of programming
- Results from other licensing/certification reviews
- Review of claims data for all 9 services
- Tracking systems for informal or “ad hoc” information gathered
- Regular review of grievances or complaints filed

Utilize the quality measurement program

- Quality bonus program thresholds
- Regular review of QM data for all measures
- Analyze Experience of Care data from surveys

Recertification

- States need to recertify CCBHCs every three years
- Including each CCBHC completing an updated Community Needs Assessment

Providing Technical Assistance to clinics

- Technical Assistance (TA) streamlines certification processes, improves outcomes, and incentivizes state goals
- Identify or advocate for state resources to support CCBHCs at all stages of implementation
- Establish communication systems for providing:
  - General information to clinics and community partners interested in the model
  - Orientation to certification requirements for clinics interested in applying to become CCBHCs
  - Reviews of submitted certification materials and feedback to meet requirements
  - Ongoing support to certified clinics regarding CQI, process improvement, practice transformation, workforce, and other relevant topics

Why Update a Certification Program?

- Established demonstration states can add new clinics to their demonstration
  - The clinics must be certified according to updated criteria
  - Some of the “new” demo clinics may have been certified according to SPA requirements in the past
  - When a state graduates from the demonstration and certifies CCBHCs under approved SPA requirements
- CCBHCs must be re-certified every 3 years including updated Community Needs Assessments and rebasing of PPS rates to actual
- Inclusion of Decertification standards
- Continuous Quality Improvement of the state’s CCBHC program

Building the Certification Process

Building a CCBHC Certification Process

- Utilize existing licenses/certification/enrollments as foundations of CCBHC certification
  - Complete a crosswalk of requirements for CCBHC and existing licenses/certifications
  - One state created an integrated MH/SU license and required it as part of the designation process for CCBHCs
  - One state requires 6 separate certifications/licenses within their pre-application to begin the CCBHC certification process
- Consider utilizing accreditation products as foundations for state certification
- Build an excel spreadsheet of the SAMHSA checklist items to calculate readiness
  - Quantitative measurement of how close a clinic is to meeting requirements
- Clarify all aspects of certification if your state must use “Designation” or “Recognition” as a CCBHC rather than “Certification”
- Consider the resources necessary to review applications and complete site-visits as part of the certification process

CCBHC accreditation products

NCQA
Measuring quality.
Improving health care.

carf INTERNATIONAL

The Joint Commission

COUNCIL
ON
ACCREDITATION
ENGAGE. EMPOWER. EVOLVE.

F12

	A	B	C	D	E	F	G	H	I	J
1	**CCBHC**	*Enter your organization name here*								
2	**Date**	*Enter date of completion here*								
3	**POC**	*Enter your organization's primary point of contact here*								
4			*Select the appropriate response and enter the score [1-5] in that column/cell.*					*Plan for reaching [4] for attestation and [5] for life of grant*	*Write a few sentences about how your clinic meets this requirement*	*List out (or link to) required documentation to support attestation narrative*
5			**Does Not Meet [1]**	**Minimally Meet [2]**	**Partially Meet [3]**	**Meet [4]**	**Exceptional [5]**	**Work Plan**	**Attestation Narrative**	**Documentation**
48	1.d.4	and in paper format, in languages commonly spoken within the community served, taking account of literacy levels and the need for alternative formats, and provided in a timely manner at intake and throughout the time a person is served by the CCBHC.								
49	1.d.4	The community needs assessment has informed which languages require language assistance.								
50	**Meaningful Access and Privacy**									
51	1.d.5	CCBHC policies have explicit provisions for ensuring that all employees, affiliated providers, and interpreters understand and adhere to confidentiality and privacy requirements applicable to the service provider, including but not limited to the requirements of the Health Insurance Portability and Accountability Act (HIPAA), 42 CFR Part 2 (Confidentiality of Alcohol and D… patient privacy requirements specific to care for minors, and other st…								
52	**Availability and Accessibility of Services**									
53	**General Requirements of Access and Availability**									
54	2.a.1	The CCBHC provides a safe, functional, clean, sanitary, and welc… services and staff.								
55	2.a.2	The CCBHC provides services during times that facilitate accessi… population served, including some evening and weekend hours… assessment.								
56	2.a.3	The CCBHC provides services at locations that are accessible to a… be served, such as community settings as informed by the comm…								
57	2.a.4	The CCBHC provides transportation or transportation vouchers f… possible with relevant funding or programs in order to facilitate… person-centered and family-centered treatment plan.								
58	2.a.5	The CCBHC utilizes telehealth/telemedicine, video conferencin… monitoring, asynchronous interventions, and/or other technolo… with the preferences of the person receiving services to suppor…								

Overview | Criteria Assessment | Scoring Summary

Ready | Accessibility: Investigate

='Criteria Assessment'!B3

	A	B	C	D	E	F	G	H	I	J	K
1	**CCBHC**	*Enter your organization name here*									
2	**Date**	*Enter date of completion here*									
3	**POC**	*Enter your organization's primary point of contact here*									
4											
5			**Does Not Meet [1]**	**Minimally Meet [2]**	**Partially Meet [3]**	**Meet [4]**	**Exceptional [5]**	**Total**	**# of items**	**Scoring Range**	**Proportion Complete**
6	**Requirement 1: Staffing**		**0**	**0**	**0**	**0**	**0**	**0**	**37**	**37-185**	**0.00%**
7	1.a.1	Needs Assessment and Staffing Plan	0	0	0	0	0	0	4	4-20	0.00%
8	1.a.2-3	Staff/Management Staffing	0	0	0	0	0	0	5	5-25	0.00%
9	1.a.4	Liability Malpractice Insurance	0	0	0	0	0	0	1	1-5	0.00%
10	1.b.1	Appropriate Licensure and Scope of Practice	0	0	0	0	0	0	2	2-10	0.00%
11	1.b.2	Required Staffing	0	0	0	0	0	0	10	10-50	0.00%
12	1.c.1	Training Plans	0	0	0	0	0	0	6	6-30	0.00%
13	1.c.2-4	Skills and Competence	0	0	0	0	0	0	3	3-15	0.00%
14	1.d.1-4	Luinguistic Competence	0	0	0	0	0	0	5	5-25	0.00%
15	1.d.5	Meaningful Access and Privacy	0	0	0	0	0	0	1	1-5	0.00%
16	**Requirement 2: Availability and Accessibility of Services**		**0**	**0**	**0**	**0**	**0**	**0**	**31**	**31-155**	**0.00%**
17	2.a.1	General Requirements of Access and Availability	0	0	0	0	0	0	8	8-40	0.00%
18	2.b.1	Requirements for Timely Access to Services and Initial and Comprehensive Evaluation	0	0	0	0	0	0	4	4-20	0.00%
19	2.b.2	Updating Comprehensive Person-Centered and Family-Centered Diagnostic and Treatment Planning Evaluation	0	0	0	0	0	0	2	2-10	0.00%
20	2.b.3	Timing of Services for Established People Who Are Receiving Services	0	0	0	0	0	0	3	3-15	0.00%
21	2.c.1-6	Access to Crisis Management Services	0	0	0	0	0	0	6	6-30	0.00%
22	2.d.1-4	No Refusal of Services Due to Inability to Pay	0	0	0	0	0	0	4	4-20	0.00%
23	2.e.1-2	Provision of Services Regardless of Residence	0	0	0	0	0	0	4	4-20	0.00%
24	**Requirement 3: Care Coordination**		**0**	**0**	**0**	**0**	**0**	**0**	**31**	**31-155**	**0.00%**
25	3.a.1-7	General Requirements of Care Coordination	0	0	0	0	0	0	12	12-60	0.00%
26	3.b.1-5	Care Coordination and Other Health Information Systems	0	0	0	0	0	0	5	5-25	0.00%
27	3.c.1-4	Care Coordination Partnerships	0	0	0	0	0	0	9	9-45	0.00%
28	3.d.1-3	Treatment Team, Treatment Planning and Care Coordination Activities	0	0	0	0	0	0	5	5-25	0.00%
29	**Requirement 4: Scope of Services**		**0**	**0**	**0**	**0**	**0**	**0**	**72**	**72-360**	**0.00%**
30	4.a.1-4	General Service Provisions	0	0	0	0	0	0	8	8-40	0.00%
31	4.b.1-2	Person-Centered and Family-Centered Care	0	0	0	0	0	0	3	3-15	0.00%
32	4.c.1	Crisis Behavioral Health Services	0	0	0	0	0	0	13	13-65	0.00%
33	4.d.1-8	Behavioral Health Screening, Assessment, and Diagnosis	0	0	0	0	0	0	11	11-55	0.00%

Overview | Criteria Assessment | Scoring Summary

Ready | Accessibility: Investigate | Display Settings

SAMHSA.gov/CCBHC-Stat

CCBHC Certification Examples

- Minnesota Certification Process and Checklist
- Missouri Policy and Procedure Manual
- Oregon Standards for CCBHCs
- Michigan Readiness Assessment for Providers
- Kansas Certification Process
- Rhode Island Certification Process
- Maine Certification Guide

Key-Take Aways

- Needs Assessment results inform goals that lead into the scope of services, which then become certification requirements
- Certification requirements are defined in the criteria and the state can define additional “green dot” state discretionary items
- Population Health Management, Quality Assurance, and Technical Assistance are key components of certification and monitoring

How did we do?

Please answer a few questions to let us know how we did and what we can do to support you in future sessions.

CCBHC S-TAC

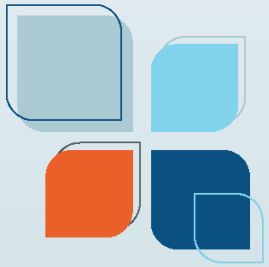
CCBHC State Technical Assistance Center

Request Technical Assistance

Email CCBHC@TheNationalCouncil.org

Resources

The CCBHC State Technical Assistance Center is here to provides accessible, timely and evidence-based technical assistance designed to meet the needs of all states implementing the CCBHC model, as well as individualized consultation to support the needs of specific states. Please request technical assistance by clicking “Request TA” above.



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