



Behavioral Health Care and Human Services Accreditation

Check in with The Joint Commission.

August 7, 2023



# What We'll Cover Today



What behavioral health care organizations need to know:

- Listen to information about standards changes
- What customers need to know about survey process for behavioral health care
- Common standards challenges, and tips to help your team
- State relations updates

# Today's Behavioral Health Care and Human Services Accreditation Experts



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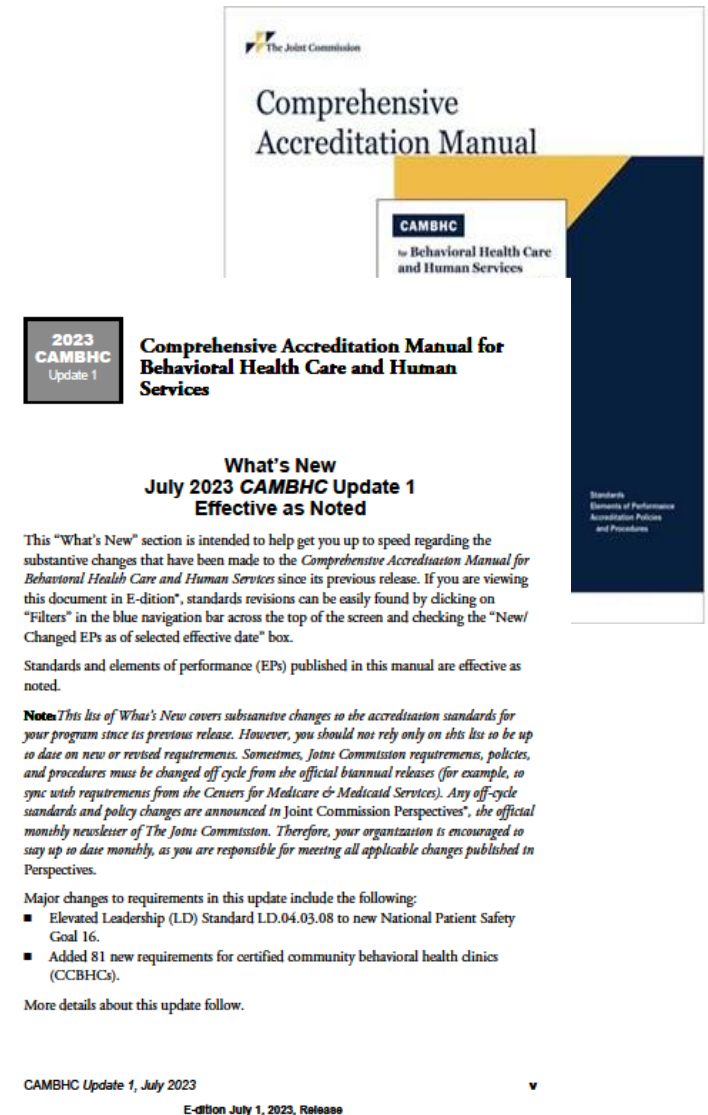


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Executive Director  
Strategic Alliances  
*The Joint Commission*

# Standards Update for Behavioral Health Organizations

# Changes for July 2023

- Major changes to requirements
- Elevated Leadership (LD) Standard LD.04.03.08 to new National Patient Safety Goal 16.
- Added 81 new requirements for certified community behavioral health clinics (CCBHCs).
- “What’s new” at each manual release



The screenshot displays the website for the Comprehensive Accreditation Manual for Behavioral Health Care and Human Services (CAMBHC). The header includes the Joint Commission logo and the title 'Comprehensive Accreditation Manual'. Below this, a box identifies the organization as 'CAMBHC Behavioral Health Care and Human Services'. A prominent box on the left side of the page reads '2023 CAMBHC Update 1'. The main heading for the update is 'What's New July 2023 CAMBHC Update 1 Effective as Noted'. The text explains that the 'What's New' section is intended to help users stay up-to-date on substantive changes. A note states that the list covers changes to accreditation standards, but users should not rely solely on it for the most current requirements, as some changes occur off-cycle. Major changes listed include the update to Standard LD.04.03.08 and the addition of 81 new requirements for CCBHCs. The page footer indicates the update is for July 2023 and was released on July 1, 2023.

# Implemented July 2023- CCBHC

- What is a CCBHC?
  - A Certified Community Behavioral Health Clinic (CCBHC) is a specially-designated clinic that provides a comprehensive range of mental health and substance use services. CCBHCs serve anyone who walks through the door, regardless of their diagnosis and insurance status.
- Joint Commission CCBHC standards reflect the requirements from SAMHSA's CCBHC criteria
- Recent update to SAMHSAs criteria, updated Joint Commission standards to implement July 1, 2024
- View standards in E-dition or print manual

# Standards Simplification Changes

- Effective Aug 27, 2023
- BHC deleted or consolidated EPs, 20
- BHC revised EPs, 5
- Prepublication Standards Page:
- <https://www.jointcommission.org/standards/prepublication-standards/select-retired-and-revised-accreditation-requirements/>



# Sign up for e-alerts

Here's the instructions for e-alerts:

<https://www.jointcommission.org/e-alerts/>

1. Enter the information in the E-Alert Form.

The screenshot shows the 'E-Alerts' registration page on the Joint Commission website. The page has a yellow header with 'Coronavirus Resources' and navigation links for 'Careers / Contact Us'. The main navigation bar includes 'Accreditation & Certification', 'Standards', 'Measurement', 'Performance Improvement', 'Resources', and 'About Us'. The page title is 'E-Alerts'. There are two sections: 'Returning subscriber' and a registration form. The 'Returning subscriber' section includes instructions and two buttons: 'Allow list' and 'Unsubscribe'. The registration form is a light blue box with a red '1' in a circle at the top left. It contains the following fields: 'EMAIL ADDRESS \*', 'FIRST NAME \*', 'LAST NAME \*', 'STATE \*' (a dropdown menu), and 'ORGANIZATION NAME \*'. Below these are two sections of radio buttons: 'CURRENTLY JOINT COMMISSION ACCREDITED' with options 'Yes' and 'No', and 'EMAIL FREQUENCY AND FORMAT \*' with options 'Daily - HTML', 'Daily - Plain Text', 'Weekly - HTML', and 'Weekly - Plain Text'. A green arrow labeled 'Scroll down' is at the bottom right of the form.



# Sign up for e-alerts

2. Under the “Content Type” section, choose “Customize type”.

3. Select “Standards Field Reviews” from the Content Type list.

The screenshot shows the 'Sign up for e-alerts' form on The Joint Commission website. The form is divided into several sections with settings for email delivery and content preferences. Red circles with numbers 2 and 3 highlight specific steps: circle 2 points to the 'Customize type' option under the 'CONTENT TYPE' section, and circle 3 points to the 'Standard Field Reviews' checkbox under the 'CONTENT TYPES' section. The form also includes a 'SUBMIT' button, a reCAPTCHA widget, and a privacy notice.

The Joint Commission

Our Websites: v

Search this site. [Search Icon]

Login

Daily - HTML

Weekly - HTML

**HEALTH CARE SETTINGS**

Select all

**CERTIFICATION SETTINGS**

Select all

**TOPIC SETTINGS**

Select all

**CONTENT TYPE**

Select all

**CONTENT TYPES**

Blog Posts

General Pages

Newsletters

Speak Ups

Standard Field Reviews

Webinars

Daily - Plain Text

Weekly - Plain Text

Customize settings

Customize certifications

Customize topics

Customize type

Events and Products

News Releases

Podcasts

Standard FAQs

Videos

To ensure delivery of your E-Alerts, please add E-Alerts@jointcommission.org as a safe sender to your network.

The Joint Commission respects your privacy and only uses information you provide to administer your account. Please agree to allow The Joint Commission to store your personal data.

**AGREE**

I'm not a robot

reCAPTCHA

**SUBMIT**

# Checking in with Survey Process

# Checking in with the Field Director

## **PHE is over!**

- We will no longer survey to vaccination requirements
- While the standard will remain present in the current manual, surveyors have been advised not to evaluate for compliance. The database will be updated and be reflected in the next standards release later this year.
- We no longer require surveyors to wear masks unless your organization requires it. However, surveyors may choose to wear them and we ask that their practice be respected.



# Checking in with Field Director - Survey Process

- Offsite Surveys
- Microsoft Teams to Remote Sites
- Treatment Planning
- Clarification
- Binders vs. Laptop
- Policies and Procedures
- Tracer Activity



# Checking in with Field Director - Survey Scoring

- NPSG 16
- CCBHC
- Measurement-Based Care
- SAFER Dashboard



# Standards Interpretation Group

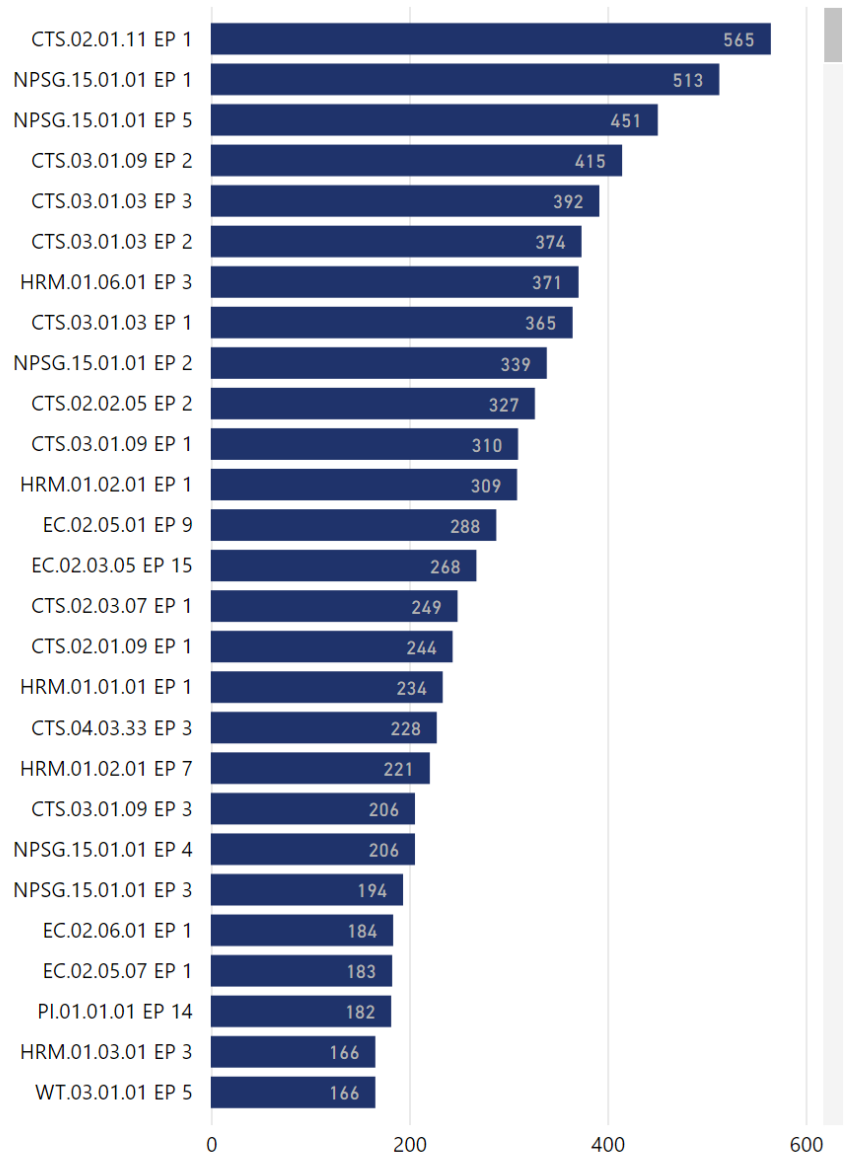
# Top Non-Compliant Standards July 1, 2022 to June 30, 2023



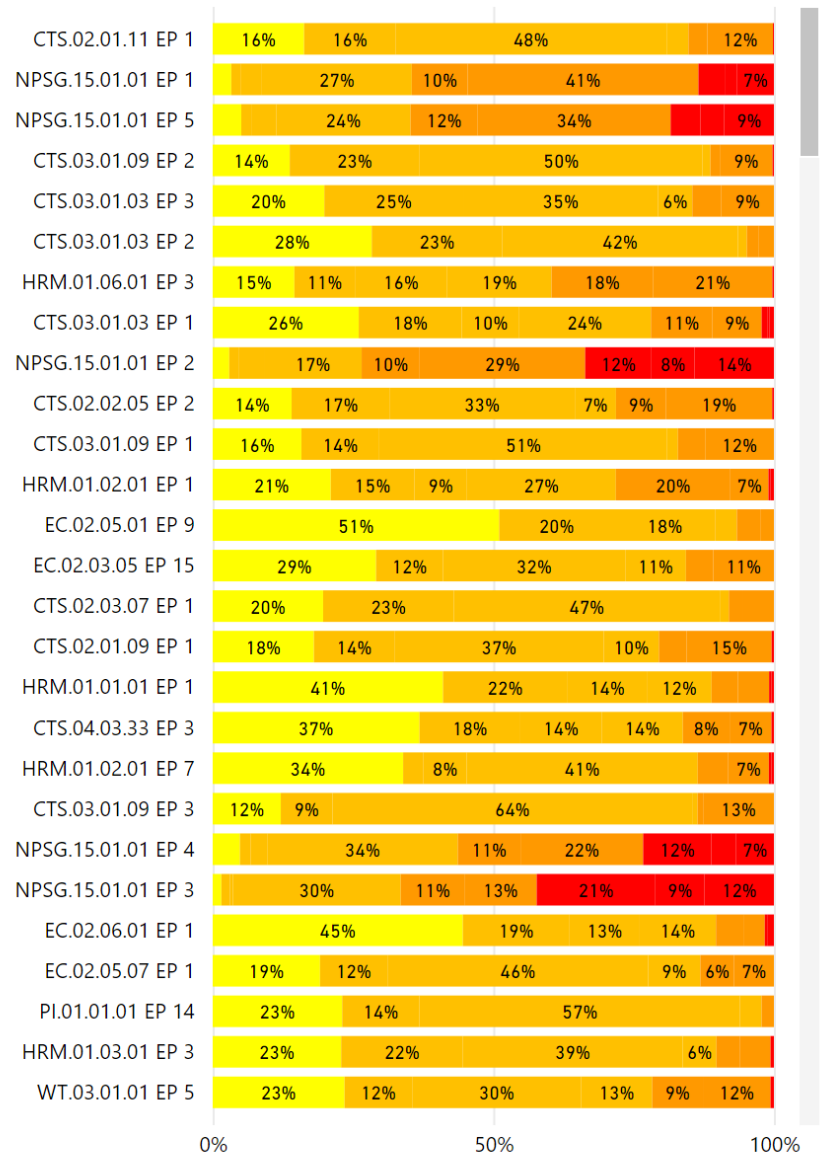
ver. 01-2023

Survey Type	Program	Deemed Prg	DSC Program	Chapter	Standard	Standard and EP	SAFER Placement	Survey Date (end date)	
Full Survey Type	BHC	All	All	All	All	All	All	7/1/2022	6/30/2023

Number of EP-Level RFIs and SAFER Placement



Proportion of SAFER Placement



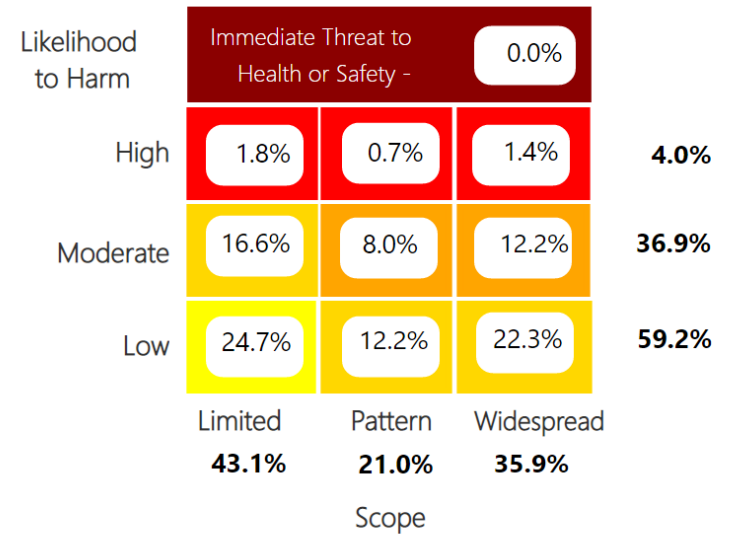
Total For Time Period and Program

Surveys	Average RFIs Per Survey	Number of RFIs
1,590	11.46	18,229

Statistics for Selected Standards

Surveys	Average RFIs Per Survey	Number of RFIs
1,590	11.46	18,229

SAFER Matrix Scoring





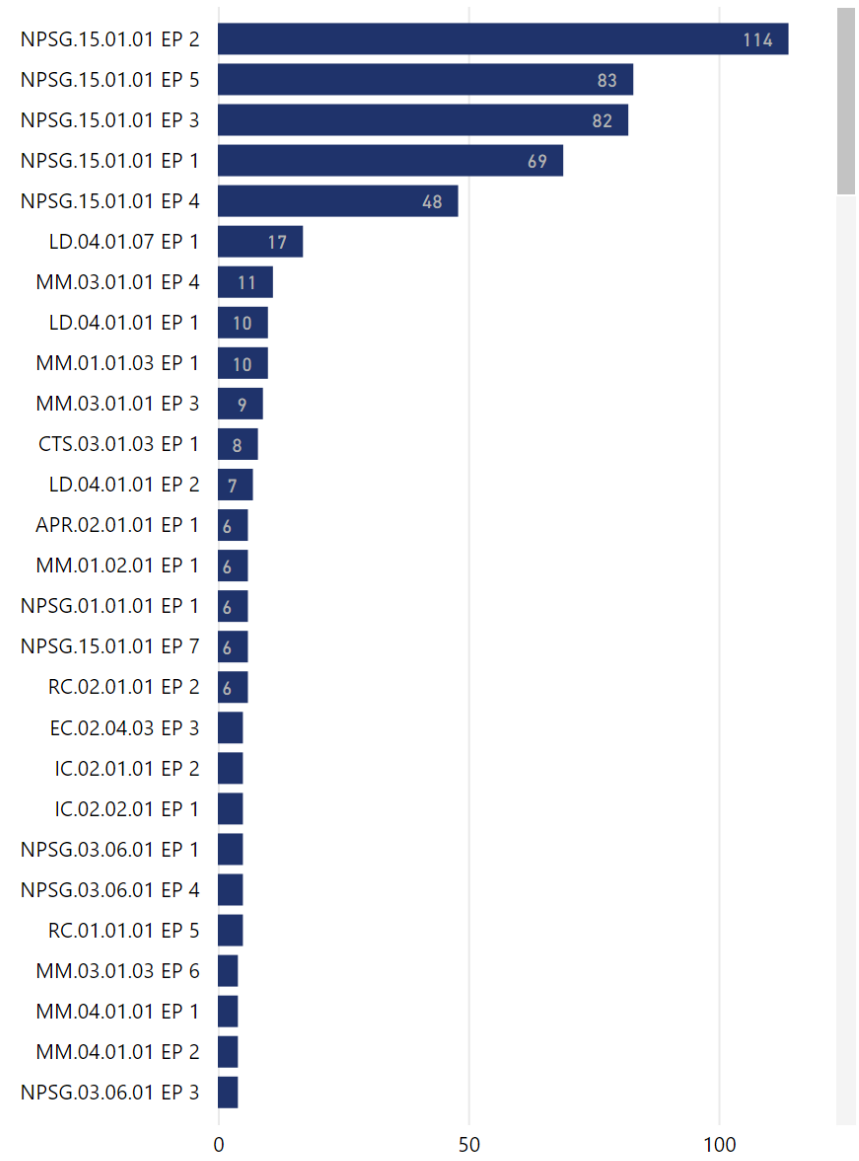
# Standards Scored at High-Risk



ver. 01-2023

Survey Type	Program	Deemed Prg	DSC Program	Chapter	Standard	Standard and EP	SAFER Placement	Survey Date (end date)	
Full Survey Type	BHC	All	All	All	All	All	Multiple selecti...	7/1/2022	6/30/2023

Number of EP-Level RFIs and SAFER Placement



Proportion of SAFER Placement



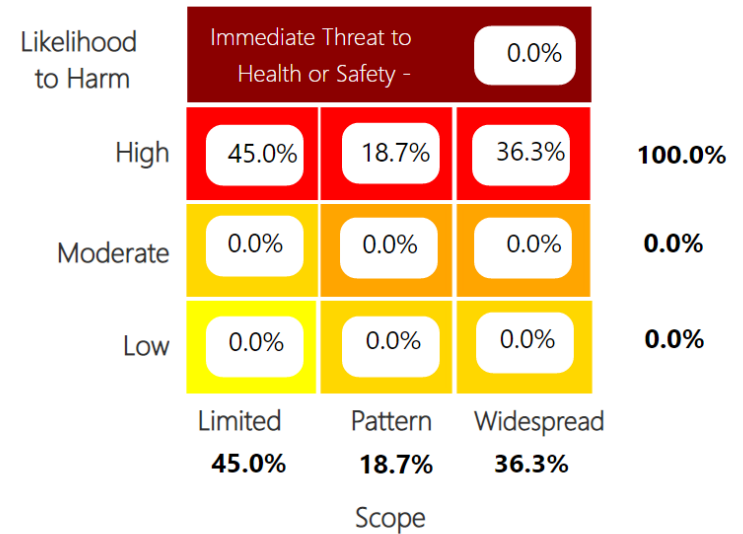
Total For Time Period and Program

Surveys	Average RFIs Per Survey	Number of RFIs
1,590	11.46	18,229

Statistics for Selected Standards

Surveys	Average RFIs Per Survey	Number of RFIs
412	1.75	722

SAFER Matrix Scoring



# NPSG.15.01.01 Suicide Prevention

## Common Non-Compliance Reasons

- Administering validated screening tool only to those with suicidal ideation
- Assessment does not include required elements
  - Missing risk and protective factors
  - No synthesis and/or documentation of level of risk
- Mitigation not implemented or documented
- Policy does not include required elements
- Lack of monitoring screening, assessment, and mitigation for improvement

# Compliance Tips and Tricks– EP 2

- Examples of validated tools for suicide risk screening - Columbia C-SSRS, NIMH - ASQ, PHQ-9, SBQ-R, and PSS-3
- Validated screening tools should not be modified/changed unless the organization can show evidence of written approval from the developer/creator of the tool
- Must be administered at the time of admission as intended by developer

If a patient triages as a "high" or "imminent" risk using a validated screening tool, we would expect 1:1 observation until the full assessment is completed to determine level of risk.

# Compliance Tips and Tricks EP 3 and EP 4

- The assessment directly asks about suicidal ideation, plan, intent, suicidal or self-harm behaviors, risk factors, and protective factors.
- Determine a level of suicide risk (e.g. high, moderate, or low).
- Document level of risk with clinical justification (if not using a tool) as well as the plans to mitigate the risk for suicide.
- Organizations determine mitigation strategies for moderate and low levels of risk.
- Patients at high-risk for suicide in an environment with ligature or other safety risks must be on continuous observation with the ability to immediately intervene.
- In ligature resistant environments without additional safety risks identified, continuous observation may be not necessary as allowable by organizational policy

# Compliance Tips and Tricks EP 5



- Policies and/or procedures
  - training and competence assessment of staff
  - guidelines for re-assessment for patients at risk for suicide, and
  - monitoring for patients who are at high risk for suicide.
- It is up to the organization to determine frequency of re-assessments
  - changes in individuals' condition
  - expressing suicidal ideation or making suicidal or self-harm gestures.

# Compliance Tips and Tricks EP 7

- Suicide reduction program
  - monitoring of all aspects of suicide prevention
    - screening, assessment, mitigation, and action taken when compliance issues are identified.



# LD.04.01.07 EP 1

- Leader's review and approve policies and procedures
- Provide adequate oversight to ensure implementation
- Educate staff on the policies/procedures including when updates are made
- Adopt law and regulation
- Focus on standards that require written documentation (plan/policies)



# LD.04.01.01 EP 1

- The organization is licensed, is certified, or has a permit, in accordance with law and regulation, to provide the care, treatment, or services
  - Active at all times
  - Applied for CLIA certificate and/or made payment?
    - Do not perform waived tests unless you have permission from the state
    - Do not need a CLIA for collecting samples and sending to the laboratory
    - Follow Manufacturer's instructions for use

# LD.04.01.01 EP 2

- Provide care, treatment, or services in accordance with licensure requirements, laws, and rules and regulations
  - Staffing requirements (ratio, RN, medical director etc.)
  - Activities and services performed
    - Diagnosis
    - Bio-psychosocial assessments
    - Medication administration/self-administration
  - Supervision – agreements/contracts
  - Documentation review and sign-off
  - Telehealth

# MM.03.01.01 EP 3 and 4

- Safe storage – labelling, temperature, and separation of controlled and non-controlled medications
- Proper handling, wasting, security, disposition, and return to storage
- Diversion control practices
  - Count of between storage and administration
  - Secured versus locked
  - Follow law and regulation

# Utilize SIG as a Customer Resource

- Discuss your challenges with SIG and obtain examples for compliance
  - Ask a standards question and request response via email or phone call
  - Questions are confidential and do not impact survey activity or outcome
- During survey activity – Special resolution phone call



# FAQ/ – Joint Commission’s Home Page

The screenshot shows the top navigation bar of The Joint Commission website. The main navigation menu includes: Accreditation & Certification, Standards, Measurement, Performance Improvement, Resources, and About Us. Below the navigation, there is a breadcrumb trail: Home > Standards. On the left, a 'Standards' sidebar menu lists: About Our Standards, Standards Field Reviews, National Patient Safety Goals, Prepublication Standards, R3 Report, Standards FAQs (highlighted with a red arrow), Universal Protocol, and Patient Safety Systems PS Chapter. The main content area features a large image of two healthcare professionals and the heading 'Standards' with the subtext 'Measure, assess, and improve your performance.'

The screenshot shows the 'Evolving with Care' banner with the text: 'Your commitment to patient safety has never wavered, and neither has ours. While we all know the pandemic isn't behind us, we are learning how to move through it safely and with care. That's why we are thoughtfully evolving the way we conduct our business to better accommodate yours.' Below the banner is a 'Connect With Us' section with six icons: Joint Commission Connect, Ask a Standards Question (highlighted with a red arrow), Report a Safety Event, Request a Speaker, Subscribe to E-Alerts, and Contact Us.

# State Relations Update

# Updates from State Relations

## **Workplace Violence**

- Criminalization of Threats Against Health Care Workers

## **Overdose Prevention**

- Decriminalize Fentanyl Test Strips
- Increase Access to Naloxone

## **Suicide Prevention**

- Mobile Crisis Services
- Expanded Access to Mental Health Professionals



Thank you for joining us.