

## GUIDANCE - CRISIS BEHAVIORAL HEALTH SERVICES

DATE: 4/6/16

**Issue: How will crisis behavioral health services be required to be provided under the CCBHC demonstration program?**

**Department's Response: CMHCs seeking CCBHC certification will be required to directly provide the crisis behavioral health services as specified in criteria 4.C of the Certified Community Behavioral Health Clinic certification criteria in facilities that were in existence prior to April 1, 2014.**

### **Basis for Response:**

There are three key pieces of federal guidance:

1. The CCBHCs are required to directly provide crisis services *"unless there is an existing state-sanctioned, certified, or licensed system or network for the provision of crisis behavioral health services that dictates otherwise"*<sup>i</sup>.
2. A DCO is an entity that is not under the direct supervision of the CCBHC<sup>ii</sup>.
3. Per the statute, no payment shall be made to a satellite facility of a CCBHC established after April 1, 2014 under this demonstration<sup>iii</sup>.

The State considers the existing crisis behavioral response system administered by the Office of Behavioral Health (OBH) to be a state-sanctioned system. This interpretation allows for a CCBHC to contract with the existing crisis behavioral response system as a DCO as long as the relationship between the two entities meets the definition of a DCO.

If a CMHC directly provides the services in the existing crisis behavioral response system and is seeking CCBHC certification, the conditions for a DCO relationship are not met. Namely, the DCO is under direct supervision of the CCBHC. **Based on this interpretation, the CMHC must directly provide the required crisis behavioral health services.**

Per the statute, no payment shall be made to satellite facilities established after April 1, 2014. However, the satellite facility guidance also specifies that facilities established before April 1, 2014 are allowed to "renovate, expand and/or replace facilities after April 1, 2014, based on the needs determined in the state prepared needs assessment without jeopardizing their certification or the PPS payment." Based on this, the CMHC can only provide the required **crisis behavioral health services in facilities that were established prior to April 1, 2014.**

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<sup>i</sup> CCBHC Certification Criteria – 2015, Page 37, Criteria 4.C,  
[http://www.samhsa.gov/sites/default/files/programs\\_campaigns/ccbhc-criteria.pdf](http://www.samhsa.gov/sites/default/files/programs_campaigns/ccbhc-criteria.pdf)

<sup>ii</sup> CCBHC Certification Criteria – 2015, Page 5, Definitions, DCO  
[http://www.samhsa.gov/sites/default/files/programs\\_campaigns/ccbhc-criteria.pdf](http://www.samhsa.gov/sites/default/files/programs_campaigns/ccbhc-criteria.pdf)

<sup>iii</sup> SAMHSA – CCBHC Satellite Clarification