



Date: December 1, 2018

DQA Information Memo 18-01

To: [Certified Mental Health/AODA Providers](#)

From: Crenear Mims, Director
Bureau of Health Services

Via: Otis Woods, Administrator
Division of Quality Assurance

Certification Process Changes

The purpose of this memo is to announce procedural changes being implemented by the Division of Quality Assurance, Bureau of Health Services, Behavioral Health Certification Section (BHCS).

The need for more access to mental health and substance use disorder treatment providers continues to increase across the state of Wisconsin and the nation. Staff vacancies and the increased focus on treatment and access for needed services has led to an increased workload and challenges in meeting required timelines. To help ensure that mandatory inspections are conducted in accordance with Wis. Admin. Codes, the following changes to certification processes are being implemented:

Timely receipt of annual applications and fees

Recertification inspections will not be scheduled or conducted until all documentation and fees have been received by BHCS in Madison. If materials are received after the due date specified in the recertification letters, scheduling conflicts may be encountered and the program risks the expiration of its certificate.

Providers are currently sent documentation 90 days prior to the certification expiration date. If the required documentation and fees have not been received by BHCS in Madison 60 days prior to the expiration date, a reminder notification will be sent to providers. If the required documentation and fees have not been received 30 days prior to the expiration date, a warning letter of impending certification revocation will be issued. If the provider's materials are not received by the expiration date, certificate revocation will occur without further warning.

Recertification processes for DHS 35 and DHS 75 (excluding DHS 75.15 providers)

Wisconsin Admin. Code chs. DHS 35 and DHS 75 do not mandate on-site inspections prior to recertification. It is BHCS's internal policy to maintain a two-year on-site inspection schedule, but allow flexibility when that inspection is conducted. For all providers who offer only DHS 35 and/or DHS 75 services, excluding § DHS 75.15 narcotic treatment programs, regulatory compliance will be verified at the time recertification documentation and fees are received.

When recertification documentation and fees are received, the provider's compliance history will be reviewed. New certificates for the next certification period will automatically be issued if:

1. The last two certification inspections (initial and/or recertification) were completed with no citations being issued.
2. Any investigations completed within the last four years were completed with no citations being issued.

The provider will be contacted by the assigned surveyor for an on-site inspection at a future date, but the inspection may occur after the new effective date of the renewed certification. This process helps to ensure there is no lapse in the certification periods for providers.

All programs approved to provide narcotic treatment service under § DHS 75.15 will continue to receive an on-site visit prior to recertification.

Usage of real-time technology for inspections

When a certified program requests a new school branch office (Tier-3), the surveyor will use a livestream capable system to conduct a virtual walkthrough to assure appropriateness of the program's location. BHCS currently has the capabilities to use FaceTime and Skype. Surveyors will contact the provider to determine which application best matches the provider's capabilities. These electronic walkthroughs will not be recorded. If technology problems are encountered, an on-site visit will be scheduled.

Surveyors may also decide to use technology to complete visual walkthroughs for new Tier-1 and Tier-2 branch offices.

Tier-2 on-site visits for recertification

If the program is using electronic health records, on-site inspection or virtual walkthroughs will not be conducted at a Tier-2 branch office during every recertification inspection. Branch office records may be reviewed remotely in the electronic health records system. A visual inspection will be required per BHCS policy at each Tier-2 branch. The surveyor may use a livestream-capable system to conduct the visual inspection.

Desk reviews for certification of add-on services

For a certified provider, surveyors may conduct desk reviews when receiving applications for new services instead of conducting on-site inspections. The surveyor may request additional information from the provider in order to make a decision regarding the request to add additional service.

If a telehealth service is being added for the first time, an on-site inspection will be required.

Questions

If you have any questions regarding this information, please contact the Behavioral Health Certification Section Chief, Cindy O'Connell, via email cindy.oconnell@dhs.wisconsin.gov or call 608-264-9894.