

# Behavioral Health Care and Human Services Accreditation

Organization
Survey Activity Guide

2025

Issue Date: December 23, 2024

# What's New for Behavioral Health and Human Services Survey Process 2025

New or revised content for 2025 is identified by <u>underlined text</u> within the noted activities.

Changes effective January 1, 2025

No changes for January 2025.

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### How to Use this Guide

The Joint Commission's Survey Activity Guide is available on your organization's extranet site.

This guide contains:

- x Information to help you prepare for survey
- x An abstract of each survey activity that includes logistical needs, session objectives, an overview of the session, and suggested participants
- x Sessions are listed in the general order that they are conducted.

A template agenda and a list of survey activities that occur during an onsite visit are posted to your organization's Joint Commission Connect extranet site in proximity to the time your application is received and reviewed. When the template agenda and survey activity list is available, please download and review the activities and think about the people you might like to have involved. The activity list includes a column in which you can record participant names or positions next to each of the sessions. Identifying key participants (and their phone numbers) for each session, including back-ups, is important. Consider including possible meeting locations and surveyor workspace in your planning documents. Reference the sessions in this Survey Activity Guide and learn more about what you can expect to occur during the activity.

The template agenda and activity list include suggested duration and scheduling guidelines for each of the activities. On the first day of survey, there will be an opportunity for you to collaborate with the surveyor in preparing an agenda for the visit that is considerate of your day-to-day operations.

# Preparing for Surveyor Arrival

### Overview

The surveyors arrive unannounced or with short notice for most surveys. Please consult the program accreditation manual, "The Accreditation Process chapter", "Unannounced Surveys" section, for more information about exceptions to the unannounced survey process. Changes to these exceptions may occur at any time and are published in the Joint Commission newsletter <u>Perspectives</u>.

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# Readiness Guide

# Behavioral Health Care

## Surveyor Preliminary Planning Session

### Organization Participants

Suggested participants include the organization's accreditation contact or survey coordinator and individual or individuals that will provide the Safety Briefing to surveyors, if different than the accreditation contact or survey coordinator.

### Logistical Needs

The suggested duration of this session is approximately 30 to 60 minutes, with only a few minutes of this time designated for the Safety Briefing.

### Surveyors need:

- x A work area they can use as their "base" for the duration of the survey with a desk or table, telephone, internet access, and access to an electrical outlet, if possible.
- x A means to secure their belongings.
- x The name and phone number of a key contact person to assist them in survey planning and tracer selection.
- x As much information and material noted on the Behavioral Health Care and Human Services Requested Documentation list as possible.

### Objectives

### Surveyors will:

- x Learn about any current organization safety or security concerns and how they should respond if organization safety plans are implemented.
- x Review organization documents to become acquainted with your organization.
- x Plan for tracer activity.

### Overview

After surveyors arrive and their identification has been verified, surveyors immediately begin planning for tracer activity by reviewing the documents you provide them. They begin discussing the focus of the survey with the other surveyors (when applicable). If documents are not available for surveyors to review during this session, they will proceed to areas where care, treatment, or services are provided and begin individual tracer activity.

The organization is requested to provide surveyors with a Safety Briefing (informal, no more than five minutes) sometime during this activity. The purpose of this briefing is to inform the surveyors of any current organization safety or security concerns and how Joint Commission staff should respond if your safety plans are implemented while they are on site. Situations to cover include:

- x Fire, smoke, or other emergencies
- x Workplace violence events (including active shooter scenarios)
- x Any contemporary issues the surveyor may experience during the time they are with you (for example, seasonal weather-related events, anticipated or current civil unrest, or labor action)

## **Opening Conference**

### **Organization Participants**

Suggested participants include members of the governing body and senior leadership representing the programs/services seeking accreditation.

Attendees should be able to address leadership's responsibilities for planning, resource allocation, management, oversight, performance improvement, and support in carrying out your organization's mission and strategic objectives.

### Logistical Needs

The duration of this session is approximately 15 minutes.

Immediately following this session is the Orientation to the Organization. If possible, designate a room or space that will hold all participants and will allow for an interactive discussion.

### Objectives

### Surveyors will:

- x Describe the structure of the survey
- x Answer questions your organization has about the survey
- x Review your organization's expectations for the survey

#### Overview

Surveyors introduce themselves and describe each component of the survey agenda. It is important for you to discuss and review your organization's expectations for the on-site survey with the surveyor(s). Questions about the on-site visit, schedule of activities, availability of documents or people and any other related topics should be raised at this time. Surveyors will also take time to review any updates to the accreditation process that may have been implemented since the organization's last full survey event.

### **IMPORTANT**

Your organization should ask questions and seek clarification from the surveyor(s) about anything that you do not understand throughout the onsite event. Depending on the question, issue, or concern, the surveyor may suggest addressing them during a Special Issue Resolution Session later in the day. It is important for you to request clarification at any time you do not understand surveyor questions, actions, or discussions.

## Orientation to the Organization

### Organization Participants

Attendees should be able to address leadership's responsibilities for:

- x Strategic planning,
- x Resource allocation,
- x Management, oversight,
- x Performance improvement, and
- x Support in carrying out your organization's mission and strategic objectives

### Consider including the following individuals

- x Senior leadership representing the programs and services
- x Member(s) of the governing body, or organization trustee
- x Administrators
- x Clinical leader(s)
- x Administrative leader(s)
- x Accreditation contact

### Logistical Needs

- x This activity is usually combined with the Opening Conference.
- x Meeting space should allow for an interactive discussion.
- x The suggested duration of this session is approximately 30-60 minutes.
- x Please do not prepare a formal presentation.

### Objective

Surveyors will learn about your organization through an interactive dialogue to help focus subsequent survey activities.

### Overview

During this activity surveyors become acquainted with your organization. They begin to learn how your organization is governed and operated, discuss leaders' planning priorities, and explore your organization's performance improvement process.

Governance and operations-related topics for discussion include:

- x Organization's mission, vision, goals, and strategic initiatives
- x Organization structure

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# **Individual Tracer Activity**

Joint Commission Participants
One surveyor per individual tracer

Organization Participants

Suggested participants include staff and management involved in the individual's care, treatment, and services.

Logistical Needs

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During the individual tracer, the surveyor observes the following (includes but is not limited to):

- x The process for planning care, treatment, or services
- x Care, treatment, or services being provided to individuals served by staff, clinicians, including physicians
- x The environment as it relates to the safety of individuals served and staff
- x Any medication processes (e.g., preparation, dispensing, administration, storage, control of medications)
- x Infection control issues (e.g., techniques for hand hygiene)
- x Administration of the organization's standardized tool or instrument for measuring outcomes to an individual served

During the individual tracer, the surveyor interviews staff about:

- x Processes as they relate to the standards
- x Communication for the cooTD [(D)2.6 j /TT1 1 F.6 (que9o)10.5 2 (y2.2 Tm <0078>Tj 463 d8J842i&0078

- x For substance use disorder treatment programs that serve individuals with opioid use disorder: The process for providing access to medications for opioid use disorder (MOUD).
  - If they refer out, how is it confirmed that the individual has received treatment and continues to receive treatment.
- x The standardized tool or instrument that is being used to measure outcomes
- x Other issues

During the individual tracer, the surveyor may speak with available licensed practitioners, including physicians about:

- x Organization processes that support or may be a barrier to care, treatment, and services for the individual served.
- x Communications and coordination with other licensed practitioners (hospitalists, consulting physicians, primary care practitioners).
- x For substance use disorder treatment programs that serve individuals with opioid use disorder: The process for providing access to medications for opioid use disorder (MOUD).
  - If they refer out, how is it confirmed that the individual has received treatment and co(t)-6.6 (i)2.6 (u(es)-2 (t)-6.6 ((r)-6 ((c)-2 (ei)2.6 (v)-2 (e(t)-6.6 (r)-5.9 (ea)10.5 (t)-6.6 (m)-5.9 (en)1 (pr)-6 evseatiod, andorlicseov(di)2.6 ((c)-2 (i)2.6 d(eat)-6.6 d )11.3 prrtingp(r)-5.9 ((c)-2 (d)10.5 es)-

### Using individual tracers for continuous evaluation

Many organizations find tracer activity helpful in the continuous evaluation of their services. If choosing to conduct mock tracers, consider the following criteria in selecting the individuals served.

### Selection Criteria

- Individuals served who move between or participate in multiple programs/services
- Individuals served recently admitted
- Individuals served due for discharge or recently discharged
- Individuals served requiring both medical and behavioral health care
- Individuals served with conditions that allow for observation of organization medication management and infection prevention and control practices

### Selection Criteria for Certified Community Behavioral Health Clinics

- Active US military member or a veteran
- Native American or Alaska Native
- Individual who screened for substance use disorder
- Individual(s) with specific language needs (e.g., requires interpreter services)
- Individual who has received crisis services from the clinic
- Individual who has received case management services from the clinic

### Care provided through programs and services to:

- High risk populations (restraint use, seclusion, suicidal)
- Vulnerable populations (very young [child welfare recipients], very old, persons with intellectual or developmental disabilities)
- Long length of stay populations

- x Staff are administering according to a schedule and if there have been instances where doses may have been missed.
- x They received any education about consequences of not taking medication as prescribed.
- x They have been instructed to contact with questions about the medication.

Surveyors will want to interview individuals served who are self -administering medications within the organization's facilities about:

- x Education they received about the medication.
- x Training they received for administering the medication.
- x Where and how the medications are stored and how they access them.
- x Medication potential side effects and reactions.
- x Missed doses and consequences of not taking medication as prescribed.
- x Who they have been instructed to call with questions about the medication or administration.

# Program Specific Tracer - Elopement

Applicable to 24-hour program settings that provide care, treatment, or services such as: Addictions, Children and Youth, Residential Treatment, Group Homes, Developmental Disabilities, Foster/Therapeutic Foster Care, and Mental Health.

### Organization Participants

Suggested participants include staff and management who have been involved in the care, treatment, or services of the individual served.

### Logistical Needs

This focused tracer occurs during time designated for Individual Tracer Activity

### Objectives

The surveyor will:

- x Evaluate the effectiveness of the organization's processes to prevent elopement therefore enhancing safety.
- x Identify process and system level issues contributing to successful elopements.

#### Overview

The surveyor selects an individual served who eloped multiple times. The surveyor begins by reviewing the case/clinical record for the events leading up to the elopement of the individual served. The surveyor evaluates the organization's physical environment and security systems.

The surveyor interviews staff about the elopement and the processes that are in place to prevent elopement and ensure the safety of individuals served.

The surveyor also interviews the individual served, if available, and family, if applicable, about:

- x Their perception of the services provided, the episode of elopement, the causation and treatment, and use of restraints
- x Elopement prevention activities they know about
- x Guidance provided from staff to prevent escalation in the future

# Program Specific Tracer – Continuity of Foster Care or Therapeutic Foster Care

Applicable to Foster and Therapeutic Foster Care service providers.

### Organization Participants

Suggested participants include the case manager, individual served, and foster parents/family members.

### Logistical Needs

This focused tracer occurs during time designated for Individual Tracer Activity.

### Objectives

The surveyor will:

x Evaluate the effectiveness of the foster care agency's processes surrounding number of foster home pfe,esbnts/

# Program Specific Tracer – Certified Community Behavioral Health Clinics (CCBHC)

is not under the direct supervision of the CCBHC but is engaged in a formal relationship with the CCBHC and delivers services under the same requirements as the CCBHC.

- x These services include, but are not limited to:
  - 1. Crisis services including 24-hour mobile crisis teams, emergency crisis intervention services, crisis stabilization, suicide crisis response, <u>withdrawal management</u>, and

# Surveyor Planning/Team Meeting

Organization Participants None

### Scheduling Guidelines

For surveys lasting more than one day, 30 minutes is scheduled toward the end of each day except the last for surveyors to conduct either Special Issue Resolution or engage in Surveyor Planning or Team Meeting activity. The surveyor will inform your organization's contact person of the activity they will be conducting.

### Logistical Needs

Surveyors will inform the organization's contact person if they need to have any information available.

### Overview

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# **Daily Briefing**

### Organization Participants

Suggested participants include representative(s) from governance, CEO/Administrator or Executive Director, individual coordinating the Joint Commission survey, and other staff at the discretion of organization leaders.

### Logistical Needs

The suggested duration for this session is approximately 15 to 30 minutes and it occurs every morning of a multi-day survey, except for the first day. Surveyors may ask to hold a daily briefing before concluding activity on the first day, depending on survey length and circumstances. If a surveyor is visiting a remote location, you may be asked for assistance with setting up a conference call to include all surveyors and appropriate staff from locations that were visited.

### Objective

The surveyor will summarize the events of the previous day and communicate observations according to standards areas that may or may not lead to findings.

#### Overview

The surveyors briefly summarize the survey activities completed the previous day. During this session the surveyors make general comments regarding significant issues from the previous day, note potential non-compliance, and emphasize performance patterns or trends of concern that could lead to findings of non-compliance. The surveyors will allow you the opportunity to provide information that they may have missed or that they requested during the previous survey day. You may also present surveyors with information related to corrective actions being implemented for any issues of non-compliance. Surveyors will still record the observations and findings but will include a statement that corrective actions were implemented by the organization during the onsite survey.

Your organization should seek clarification from the surveyors about anything that you do not understand. Note that the surveyors may decide to address your concerns during a Special Issue Resolution Session, later in the day. It is important for you to seek clarification if you do not understand anything that the surveyors discuss.

# Competence Assessment and Credentialing/Privileging

### Organization Participants

Suggested participants include staff responsible for the human resources processes; orientation and education of staff; assessing staff competency; assessing licensed practitioner and physician competency. There should be someone with authority to access information contained in personal and credential files.

### Logistical Needs

The suggested duration for this session is 30-60 minutes. Inform the surveyors of your process for maintaining competency and credentials records. The review of files is not the primary focus of this session; however, the surveyor will verify process-related information through documentation in personnel or credential files. The surveyor identifies specific staff, licensed practitioners, and physicians whose files they would like to review based on tracer activity.

For CCBHC Surveyors will need to see staffing plan(s). Surveyors will also look for evidence that the organization is meeting SAMHSA Criteria 1.b.2. that specifies the type of stafHft56¢b.9 (pe)1

- x Experience, education, and abilities assessment
- x Ongoing education and training related to screening for physical pain.
- x In acute, 24-hour settings (including inpatient crisis stabilization or medically supervised withdrawal management ), education on pain assessment and management
- x Competency assessment, maintenance, and improvement, including
  - For staff who assess, plan services for, and deliver services to individuals with opioid use disorder: Competencies and/or education regarding evidence-based practices on treating opioid use disorder, including at least:
    - f Medication for opioid use disorder
    - f Psychosocial therapies
    - f Harm-reduction

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- x For CCBHC Surveys: Clinic staff competencies required for:
  - Military and veteran culture,
  - Primary care integration,
  - o CCBHC continuity plan,
  - o Person-centered, recovery-oriented, evidence-based care,
  - o Roles of families and peers in care
- x Competency assessment process for contracted staff, as applicable
- x Process for assigning clinical responsibilities
- x Other topics and issues discovered during tracer activity

# Infection Control, Environment of Care and Emergency Management Session

### Organization Participants

Participants should include individuals familiar with processes: To prevent and reduce the spread of infection; related to safety, security, and management of the environment of care; and, to identify, plan, and prepare for potential emergencies. This may include leaders, safety and security coordinator, facility manager, building utility systems manager, office manager, information technology (IT) representative, and the person(s) responsible for emergency management.

### Objective

The surveyor will assess your organization's degree of compliance with relevant standards and identify vulnerabilities and strengths in your organization's processes to prevent and reduce the spread of infection, manage the environment of care, and identify, plan, and prepare for potential emergencies.

### Logistics

The duration of this session is approximately 60 minutes depending on the type of organization, services provided, and facilities.

### Overview

This activity begins with a group discussion of the organization's infection prevention and control planning and activities, the environment of care risks and plans to mitigate those risks, and finally emergency management planning and preparation.

- x The individual(s) responsible for the organization's infection prevention and control program should be prepared to review the plan specifics including:
  - o Identification of infection risks and current priorities for prevention and control.
  - o Goals for infection prevention and control, including how they were determined and how they are communicated to staff.

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x Utilities – tracing the planned actions for a communication failure or electrical failure.

### Tracer activity will include:

- x Having staff describe or demonstrate their roles and responsibilities for minimizing the risk, what they are to do if a problem or incident occurs, and how to report the problem or incident.
- x Assessing any physical controls for minimizing the risk (i.e., equipment, alarms, building features).
- x Assessing emergency plans for responding to utility system disruptions or failures (e.g., alternative source of utilities, notifying staff, how and when to perform emergency clinical interventions when utility systems fail, and obtaining repair services).
- x If equipment, alarms, or building features are present for controlling the particular risk, reviewing implementation of relevant inspection, testing, or maintenance procedures.

## Life Safety Code ® Building Assessment

Appli cable to 24-hour care settings only.

See the Life Safety standards chapter overview in the Accreditation Manual for more information. This activity does not apply to Behavioral Health Care and Human Services organizations designated as business occupancies.

### Organization Participants

Suggested participants include the individual who manages your organization's facility(ies) and other staff at the discretion of your organization.

### Logistical Needs

The surveyor will need a ladder and flashlight for this activity and the escort needs to have keys or tools necessary to open locked rooms, closets, or compartments to allow the surveyor access to and observation of space above the ceilings.

In preparation for this session, the surveyor meets with an organization staff member to become oriented to the layout of the building (including arrangement of smoke compartments, location of any suites, age of building additions, areas with sprinklers, areas under construction, and any equivalencies granted by the Joint Commission). This activity is greatly facilitated if the organization has plans and drawings available that display the building fire safety features. The surveyor will also review your organization's processes for Interim Life Safety Measures (ILSMs).

### Objectives

During this session, the surveyor will:

- x Evaluate the effectiveness of processes for maintaining fire safety equipment and fire safety building features (NFPA 99-2012)
- x Evaluate the effectiveness of processes for identifying and resolving Life Safety Code® (NFPA 101-2012) problems
- x Evaluate the effectiveness of processes for activities developed and implemented to protect occupants during periods when a building does not meet the applicable provisions of the Life Safety Code® (NFPA 101-2012) or during periods of construction
- x Evaluate the effectiveness of processes for maintaining and testing any emergency power systems (NFPA 99-2012)
- x Evaluate the effectiveness of processes for maintaining and testing any medical gas and vacuum systems (NFPA 99-2012)
- x Determine the degree of compliance with relevant Life Safety Code® (NFPA 101-2012) requirements
- x Educate attendees on potential actions to tak (C)2.ucac 0.002 caddi2 (of)4.2 ().6 (eapo)10.5 .8 (t)pled-6.6

During the building tour, the surveyor will:

- x Assess hazardous areas, such as soiled linen rooms, trash collection rooms, and oxygen storage rooms
- x Assess required fire separations
- x Assess required smoke separations (at least two)
- x Conduct an "above the ceiling" survey at each location identified above by observing the space above the ceiling to identify:
  - f penetrations of smoke, fire, or corridor walls
  - f smoke or fire walls that are not continuous from slab-to-slab and outside wall to outside wall
  - *f* penetrations or discontinuities of rated enclosures including hazardous areas, stairwells, chutes, shafts, and floor or roof slabs
  - f corridor walls that are not slab-to-slab or do not terminate at a monolithic ceiling (if the building is fully sprinklered and the ceiling is smoke tight, the walls may terminate at the ceiling line)
  - f the presence or absence of required smoke detectors or fire dampers
  - f the presence or absence of required fire proofing on structural members such as columns, beams, and trusses
- x Verify that fire exits per building and verify that they are continuous from the highest level they serve to the outside of the building
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x Life safety issues such as smoke detectors in or near the

# Foster Parents Group Meeting

including victim and witness follow-up and support, and the incident reporting system, and analysis of incidents and trends?

# **Surveyor Report Preparation**

# Organization Participants None

### Logistical Needs

The suggested duration of this session is approximately 60-120 minutes. Surveyors need a room that includes a conference table, power outlets, telephone, and internet access.

### Overview

Surveyors use this session to compile, analyze, and organize the data collected during the survey into a report reflecting your organization's compliance with the standards. Surveyors will provide you with the opportunity to present additional information at the beginning of this session if there are any outstanding surveyor requests or further evidence to present from the last day of survey activity. Surveyors may also ask organization representatives for additional information during this session.

# **CEO** Exit Briefing

Organization Participants

# Organization Exit Conference

### **Organization Participants**

Suggested participants include the CEO/Administrator (or designee), senior leaders and staff as identified by the CEO/Administrator or designee.

### Logistical Needs

The suggested duration of this session is approximately 30 minutes and takes place immediately following the Exit Briefing.

### Objectives

### Surveyors will:

- x Verbally review the Summary of Survey Findings Report, if desired by the CEO
- x Review identified standards compliance issues

### Overview

Surveyors will verify with participants that all documents have been returned to the organization. You are encouraged to question the surveyor about the location of documents if you are unsure.

Surveyors will review the Summary of Survey Findings Report with participants. pants.tharyb