

Community-Based Behavioral Services (CBS): Policy Guidance for Providers of Community Support Team (CST) Services

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This policy document provides interpretive guidance to providers certified and enrolled to deliver Community Support Team (CST), including those enrolled to deliver Violence Prevention Community Support Team (VP-CST) services.

CST is an intensive, team-based approach to mental health care for customers of all ages who require more than standard outpatient care to address their significant functional needs and/or to address behavioral or social complexities impacting their care. Customers receiving CST services are at a higher risk for experiencing a behavioral health crisis and for being institutionalized due to their behavioral health condition. As such, providers of CST services play a vital role in helping to stabilize customers in their home and community setting, reducing their reliance on the crisis system.

To this end, regulations at 89 III. Adm. Code 140.453(d)(4)(B)(i) and 140.453(d)(4)(C)(i) require that CST services be available 24 hours per day, seven days a week, each week of the year. The purpose of this requirement is to provide support for customers after hours in implementing coping skills or the actions found on their crisis prevention or safety plan, with the aim of de-escalating a potential crisis before it reaches a level that requires Mobile Crisis Response services.

To meet the requirement of 24/7 availability, a provider must demonstrate it has the staffing capacity to provide treatment services and crisis de-escalation support to customers 24 hours a day, 7 days a week. 24/7 staffing availability may be met by a mix of the provider's designated CST team members and other staff within the provider's organization, such as members of the provider's Mobile Crisis Response team.

While a provider may utilize non-CST staff to meet the 24/7 staffing requirement, this does not negate the requirement outlined at 89 III. Adm. Code 140.Table N(c)(1)(A)(ii), which requires that CST services be provided during times that reasonably accommodate the customer's treatment needs. This means that the designated CST team members are expected to have flexible schedules, and for services to generally be available during non-standard business hours (after 5 pm and on weekends) based upon the customer's needs and preferences; it is not sufficient for non-CST staff to provide all needed services during non-standard business hours. Providers may demonstrate compliance with this requirement through policy/procedure, job descriptions for CST team members, and through documentation of the preferences of the customer within their IM+CANS.

If a provider utilizes non-CST staff to meet the 24/7 staffing requirement, the provider must demonstrate through policy and procedure how the staff will collaborate and share



knowledge amongst one another in alignment with the philosophy and goals of teambased care. At a minimum, these policies and procedures must include:

- A description of how non-CST staff will access relevant information on CST customers, such as their treatment plan and crisis safety plan;
- A description of how information will be shared back to the CST team if a non-CST staff provides services to a CST customer, with a requirement that information be shared no later than one (1) business day after services are delivered;
- A requirement for non-CST staff, or their supervisor or program manager, to participate in the weekly CST team meetings; and,
- A description of how non-CST staff will seek consultation, as needed, from the CST team on a particular customer.

The program approval review process administered by the Office of Medicaid Innovation (OMI) on behalf of HFS will be updated consistent with this guidance. Questions about this policy guidance may be directed to HFS.BBH@illinois.gov.