



COMMONWEALTH of VIRGINIA

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COMMISSIONER

DEPARTMENT OF
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MEMORANDUM

To: DBHDS Licensed Providers
From: Jae Benz, Director, Office of Licensing
Date: April 23, 2020
RE: Reporting COVID-19 Related Changes in Business Status in CHRIS

Purpose: The purpose of this memorandum is to communicate DBHDS' expectations for providers to report temporary COVID-19 related service changes to the department, and to inform providers of a newly developed feature in the DBHDS CHRIS system that will allow providers to report such changes directly through the CHRIS system.

Overview: Governor Ralph Northam issued [Executive Order 51](#) on March 12, 2020 declaring a state of emergency in Virginia related to the COVID-19 public health crisis. DBHDS is aware that the ongoing COVID-19 emergency has created many challenges for licensed providers. Some providers may have had to close licensed services or service locations. Others may be facing challenges with staffing, bed capacity, and the need to alter service delivery models. In an effort to allow providers sufficient flexibility to meet these challenges, and to continue serving the Virginians who rely upon them, DBHDS has taken a number of steps that allow providers to temporarily alter their licensed services during the COVID-19 state of emergency. Some of these alterations require prior approval by the Office of Licensing, while others may not. **Note however that any permanent change must be made through the standard service modification process.** Temporary alterations to a provider's licensed services may include:

- Changing capacity (individuals served, bed counts, etc);
- Changes to staffing;
- Implementing telehealth;
- Temporarily suspending admissions;
- Modifying admissions policies;
- Not accepting any new admissions;
- Temporarily suspending operations;
- Temporarily moving or changing locations (requires approval of licensing specialist through service modification process); or

- Temporarily providing a licensed service in an unlicensed location (requires approval of licensing specialist through temporary service modification process).

For additional information about the types of COVID-19 related provider flexibilities and process by which a provider may request temporary changes in services, please visit the COVID-19 [Frequently Asked Questions page for DBHDS-licensed providers](#).

DBHDS recognizes that providers may need to make these changes quickly during the COVID-19 state of emergency in order to accommodate the changing needs of individuals and to respond to the changing face of the emergency. However, it is important that these changes are communicated to DBHDS consistently and promptly when they occur, not only so that the DBHDS Office of Licensing can maintain an accurate accounting of providers' operating status, but also so that the DBHDS Emergency Operations Center can maintain sufficient situational awareness of available resources, emerging challenges, community needs, and potential gaps in service availability throughout the Commonwealth.

To facilitate prompt and consistent communication to DBHDS of COVID-19 related alterations to provider's business status, DBHDS is updating the DBHDS Computerized Human Rights Information System (CHRIS) to allow for the reporting of these service changes through CHRIS. Beginning April 27, 2020 at 10 a.m., this application will be available to providers, and providers will be required to utilize this application to inform DBHDS of COVID-19 related service changes. Providers will be required to report temporary changes to their licensed services that have occurred since March 12, 2020 within five business days **even if they have already communicated those changes to the Office of Licensing through their licensing specialist or otherwise.**

While providers should continue to communicate with their licensing specialist about COVID-19 related changes to their licensed services, the uniform and centralized collection in real time of provider business statuses is essential for DBHDS to be able to accurately identify, track, and respond to COVID-19 related service gaps and disruptions. Instructions for submitting business status information through CHRIS can be found in the attached document entitled *Navigating Provider Reporting User Guide*.