

LICENSURE EXCEPTIONS FOR OFF-SITE SERVICES

Licenses granted by DASA are facility specific and the expectation is that all services are delivered at the location of the licensed site. However, Part 2060.203 authorizes the Director to grant a request for delivery of intervention or treatment services at a location other than the licensed site when good cause is established by the requesting organization.

Historically, in determining good cause, it was assumed that the need for an off-site exception was predominantly for individual services that would be delivered on an as needed basis in locations where establishing a fully licensed office would not be practical or economically feasible. As such, brief interventions, assessment and individual counseling would comprise the majority of service hours with sufficient time allocated for individual, confidential counseling and continued stay reviews. Group counseling was the least preferred modality as the patient census and subsequent hours necessary to sustain ongoing groups would most likely support the need to fully license the location.

In the past few years, requests for off-site exceptions have greatly increased, specifically for services at nursing homes. In December 2014, a preliminary analysis of patient records and services at these locations led DASA to place a moratorium on renewing or granting any additional exceptions for the delivery of off-site substance abuse services at nursing homes until a more thorough review could be conducted. This review is nearly complete and specific guidance concerning the continued delivery of off-site exceptions for these services will be forthcoming.

However, as part of this review, DASA also recognized the proliferation of off-site exceptions in general and the need to strengthen and clarify the process for determining good cause and the types of services that can be authorized by these exceptions. Therefore, effective immediately, specific criteria will be used to evaluate any new request for an off-site exception and to determine the continuation of any current off-site exception.

In determining good cause for an off-site exception, the Director shall consider, at a minimum, the following factors:

1. The ability of the off-site location to provide the environment required for the level of care.
2. The gravity of the reason that services at the licensed location are not acceptable (transportation, sickness, etc.).
3. The availability of necessary support functions at the off-site location.
4. The availability to provide a professional environment at the off-site location.
5. The physical safety of the patient.
6. Compliance with applicable state and federal regulations.

In addition, all services delivered off-site must meet the following criteria:

Part 2060.203 authorizes the Director to grant a request for delivery of intervention or treatment services at a location other than the licensed site when good cause is established by the requesting organization.

1. The only services that will be delivered are Level 1 (Outpatient) or those authorized by an intervention license.
2. The established office hours for the location will not exceed 15 per week.
3. The total number of staff hours will not exceed 15 per week.
4. The total number of group hours per week will not exceed eight (8).

As is currently stated in Part 2060.203, off-site exceptions will not be required for:

1. Patient or client emergency situations;
2. Services delivered in facilities or offices owned or operated by the State of Illinois or any local government entity, with the exception of Illinois Department of Corrections facilities and city or county operated jails and detention centers;
3. Schools or hospitals;
4. Court ordered service to an individual in jail;
5. Early intervention services; or
6. Case management services.

If your organization currently holds off-site licensure exceptions, you will be contacted in the near future to determine the necessity for an on-site review of services and patient records. If it is determined that the new criteria cannot be met, it will be necessary for your organization to obtain a full license for the off-site location and DASA staff will work with you to ensure a smooth transition of patient care, if needed.

Thank you in advance for your cooperation and assistance. As always, contact DASA Help at DHS.DSAHELP@ILLINOIS.GOV with questions.