

SWMBH Operating Policy 2.15

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| Subject: CMH and Provider Training Requirements | | Accountability: Provider Network | Effective Date: 8/4/2014 | Pages: 2 |
| REQUIRED BY: BBA Section <u>see attachment for citations (2.15A)</u> PIHP Contract Section <u>see attachment for citations (2.15A)</u> NCQA/URAC Standard _____ Other _____ | | | Last Reviewed Date: 8/17/17 | Past Reviewed Dates: 12/16/16 |
| LINE OF BUSINESS: <input checked="" type="checkbox"/> Specialty Waiver (B/C) <input checked="" type="checkbox"/> 1115 Waiver <input checked="" type="checkbox"/> Healthy Michigan <input checked="" type="checkbox"/> SUD Medicaid <input checked="" type="checkbox"/> SUD Block Grant <input type="checkbox"/> MI Health Link <input type="checkbox"/> OTHER: _____ | | APPLICATION: <input checked="" type="checkbox"/> SWMBH Staff and Ops <input checked="" type="checkbox"/> Participant CMHSPs <input checked="" type="checkbox"/> SUD Providers <input checked="" type="checkbox"/> MH / DD providers <input type="checkbox"/> Other: _____ | Last Revised Date: 8/17/17 | Past Revised Dates: 12/16/16 |
| Approved : _____ Date: _____ | | | Required Reviewer: Director of Provider Network Management and Clinical Improvement | |

I. Purpose

To ensure that all Southwest Michigan Behavioral Health (SWMBH) staff and providers adhere to contractual, state and federal requirements applicable to staff qualifications and trainings pertinent to services provided.

II. Policy

It is the policy of Southwest Michigan Behavioral Health that all participant Community Mental Health Service Provider (CMHSP) staff and contracted providers must maintain a minimum standard of training to assure that SWMBH's customers receive the best support and treatment in order to achieve desired outcomes, as well as to comply with State and Federal requirements.

III. Standards and Guidelines

- A. SWMBH shall provide a Training Requirement Matrix to identify requirements specific to services provided for SWMBH- and Community Mental Health (CMH) -contracted providers and staff.
- B. For Direct Service Personnel hired through employer of record self-determination arrangements, the minimum training requirements are listed below. See Attachment 2.15A for timeframe requirements. Other trainings, for example, CPR, Cultural Competency or Medication Administration, may be required by the Customer or their guardian as part of the employment arrangement.
 - a. Non-Aversive Techniques for Prevention and Treatment of Challenging Behavior (if necessary to implement individual person-centered plans(s) of person(s) for whom they are responsible for providing direct care),
 - b. Corporate Compliance,
 - c. Health Insurance Portability Accountability Act (HIPAA),
 - d. Recipient Rights,
 - e. Blood-Borne Pathogens,

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- f. First Aid (if providing Aide services as defined in Michigan PIHP/CMHSP Provider Qualifications per Medicaid Services & HCPCS/CPT Codes).
- C. All Aides shall be trained in the individual person-centered plans of the persons for whom they are responsible for providing direct care, including any plan addenda or care plans (e.g., Behavior Treatment Plans, Nursing Care Plans).
- D. SWMBH, participant CMHSPs, provider agencies, and fiscal intermediaries are responsible for providing, and maintaining records of, training of all staff.
- E. SWMBH and/or participant CMHSPs shall annually verify compliance with training standards during site reviews and staff evaluations.

IV. Definitions

- A. All – All staff including temporary staff, volunteers and interns.
- B. Aides – All staff providing Aide services as defined in Michigan PIHP/CMHSP Provider Qualifications Per Medicaid Services & HCPCS/CPT Codes, including, but not limited to, Community Living Supports, Personal Care, Skill Building Assistance, Respite, and Pre- or Non-Vocational Services.
- C. Service Personnel – All staff providing direct services to customers.
- D. Specialized Residential Staff – All staff providing services to customers in a specialized residential setting.

V. References

- A. Michigan Mental Health Code
- B. Medicaid Provider Manual
- C. Michigan Department of Health and Human Services (MDHHS) Prepaid Inpatient Health Plan (PIHP) Master Contract
- D. Michigan AFC Licensing Rules
- E. BHDDA Prevention Policy

VI. Attachments

- A. SWMBH 2.15A Training Requirement Matrix

| Training | Initial | Ongoing | Source | Required for | Online Training Acceptable |
|--|-------------------------|--|---|---|---|
| Section 1. Core Trainings | | | | | |
| Corporate Compliance | Within 30 days of hire | Annually | Medicaid Integrity Program (MIP) Deficit Reduction Act (DRA) | All | Y - refresher class only. |
| Cultural Diversity Training | Within 6 months of hire | Annually | MDHHS Master Contract Part II(A); 4.5 42 CFR 438.206 SWMBH Policy 3.7 | All | Y |
| HIPAA | Within 30 days of hire | Annually | 45 CFR 164.308(a)(5)(i) & 45 CFR 164.503.(b)(1) | All | Y |
| Recipient Rights | Within 30 days of hire | Annually | MH Code: 330.1755(5)(f) SUD admin rules: R 325.14302 | All | Y - refresher class only. |
| Limited English Proficiency | Within 6 months of hire | N/A | MDHHS Master Contract Part I; 18.16 Office of Civil Rights Policy Guidance on the Title VI Prohibition Against Discrimination | All | Y |
| Advance Directives | Within 30 days of hire | Every 2 Years | 42 CFR 422.128 42 CFR 438.3 MDHHS Master Contract Part II(A) 7.10.5 | All in the following roles: • Primary clinicians & SUD therapists (including residential/detox) • Access/UM staff • Customer Services • Psychiatrists/nurses Peer support specialists • Service supervisors/directors of the above listed staff | Y |
| Grievances & Appeals (for individuals who handle notices - modified according to denial role/responsibility) | Within 30 days of hire | Annually | 42 CFR 438.400-424 MDHHS Master Contract Attachment P 6.3.1.1 | All in the following roles: • Primary clinicians & SUD therapists (including residential/detox) • Access/UM staff • Customer Services • Service supervisors/directors of the above listed staff | Y - Initial class recommended live as the concepts are complex (not required) |
| Customer Services Concepts (grievance and appeal rights and processes for people who do not handle notices) | Within 30 days of hire | Annually | 42 CFR 438.400-424 MDHHS Master Contract Attachment P 6.3.1.1 | All in the following roles: • Psychiatrists/nurses • Peer support specialists • Recovery coaches • Reception staff • Service supervisors/directors of the above listed staff • Minimum one person per site for all other services (MH and SUD) | Y |
| Person Centered Planning | Within 60 days of hire | Annually | MDHHS Master Contract Attachment P.4.4.1.1 | BH Direct Service Personnel | Y (initial and updates). Annual updates must be documented but can take many different forms. Consider attending a conference, online training, etc. |
| Self-determination (may be integrated into Person Centered Planning training) | Within 60 days of hire | Annually | MDHHS Master Contract Attachment P.4.4.1.1 | BH Direct Service Personnel | Y |
| First Aid (MDHHS Approved only) | Within 60 days of hire | As required per the training program (usually every 2-3 years) | Medicaid Provider Manual 2.4 & 18.12 | Aides, Behavior Technicians, others as necessary for job duties | N |

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|---|--|--|---|--|--|
| CPR (MDHHS Approved only) | Within 60 days of hire | As required per the training program (usually every 2-3 years) | AFC Licensing R 400.14204(3) and R 330.1806 | Specialized Residential staff, others as necessary for job duties | N |
| Blood Borne Pathogens (Exposure Control, Prevention of Disease Transmission) | Within 30 days of hire | Annually | MIOSHA R 325.70016 | Direct Service Personnel / others as necessary for job duties | Y - with opportunity for supervised practice and Q&A with a knowledgeable trainer must be included. |
| Training in Individual Plan(s) of Service of customers served including customer-specific emergency procedures | prior to delivery of service | when plans are updated or amended | Medicaid Provider Manual 15.2.C. | Aides | N |
| Trauma Informed Systems of Care | Within 60 days of hire | NA | MDHHS Master Contract Attachment P.2.7.10.6. and 7.10.6.1 | All | Y- (on-line module: Creating Cultures of Trauma-informed Care with Roger Fallot, PH.D of Community Connections, Washington, DC is available at http://improvingmilpractices.org). for use in training. Other evidence-based curriculums can be utilized. |
| Section 2. Specialized Residential | | | | | |
| Non-Aversive Techniques for Prevention and Treatment of Challenging Behavior (PIHP-approved curriculum if restrictive interventions included) | Within 60 days of hire | Annually | MDHHS Master Contract Attachment P.1.4.1 and R 330.1806 | All Specialized Residential staff; staff of other providers as necessary to implement individual person-centered plans(s) of person(s) for whom they are responsible for providing direct care | N |
| Emergency Preparedness | Within 90 days of hire or prior to working independently with customers or as lead staff | NA | R 330.1806 AFC Licensing R 400.14204(3) | Specialized Residential Staff | Y |
| Medication Administration | Within 90 days of hire or prior to working independently with customers or as lead staff | NA | Specialized Residential Licensing Rules R 330.1806 | Specialized Residential Staff | N |
| Introduction to Special Needs of MI/DD | Within 90 days of hire or prior to working independently with customers or as lead staff | NA | Specialized Residential Licensing Rules R 330.1806 | Specialized Residential Staff | Y |
| Nutrition | Within 90 days of hire or prior to working independently with customers or as lead staff | NA | Specialized Residential Licensing Rules R 330.1806 | Specialized Residential Staff | Y |
| Role of Direct Service Workers/Working with People | Within 90 days of hire or prior to working independently with customers or as lead staff | NA | Specialized Residential Licensing Rules R 330.1806 | Specialized Residential Staff | N |
| Health Administration | Within 90 days of hire or prior to working independently with customers or as lead staff | NA | Specialized Residential Licensing Rules R 330.1806 | Specialized Residential Staff | Y |
| Section 3. Service Area Training Requirements | | | | | |
| Access Standards Training | Within 30 days of hire | Annually | MDHHS Master Contract Attachment P.4.1.1 | Access staff | Y |
| ACT physician training (MDHHS approved) | Within 12 months of hire | NA | Medicaid Provider Manual 4.3 | ACT physicians | N |
| ACT training (MDHHS approved) | Within 6 months of hire | Annually | Medicaid Provider Manual 4.3 | ACT staff - except physicians | N |

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|--|--------------------------|-------------------|--|-----------------------------------|---|
| Child and Family specific training | Within 12 months of hire | 24 hours Annually | Children's Diagnostic and Treatment Services Program requirement | Child mental health professionals | Y - Viewing videos, online training, or reading should account for no more than 8 hours of the 24 hour minimum per year |
| Co-occurring training | Within 30 days of hire | Every 2 years | MDHHS Master Contract Attachment P.4.1.1 | Access staff | Y |
| Core Components of Case Management | Within 30 days of hire | Annually | Medicaid Provider Manual Section 13.1 | MH Case Management Staff | Y |
| Federal Drug and Alcohol Confidentiality Law (online at www.improvingmipractices.org or www.mi-pte.org/online.php) | Within 30 days of hire | Annually | BHDDA Prevention Policy | SUD Staff | Y |

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| Level One Communicable Disease (online at www.improvingmipractices.org or www.mi-pte.org/online.php) | Within 60 days of hire | NA | BHDDA Prevention Policy #02 | SUD Staff | Y |
| MDHHS three-day Wraparound Facilitator training | 90 days of hire | NA | Medicaid Provider Manual 3.29.B | Wraparound Facilitators and Supervisors who are working with families | N |
| MDHHS Wraparound trainings | Within 12 months of hire | 2 per calendar year | Medicaid Provider Manual 3.29.B | Wraparound Facilitators | N |
| MDHHS Wraparound trainings - 1 general, 1 supervisory | Within 12 months of hire | 2 per calendar year | Medicaid Provider Manual 3.29.B | Wraparound Supervisors | N |
| MDHHS approved Clubhouse-specific training | Within 6 months of hire | Annually | Medicaid Provider Manual 5.8 | Clubhouse staff | N |
| Registered Behavior Technician (RBT) training | Prior to providing Behavioral Health Treatment services | N/A | Medicaid Provider Manual 18.12 | Behavior Technicians | Y |
| Section 4. Functional Assessment Tool Training | | | | | |
| LOCUS | Prior to administering | Booster training as required by MDHHS or SWMBH clinical policy | MDHHS Master Contract Part II(A) 7.7.3 | LOCUS assessors | N |
| SIS | Prior to administering | Booster training as required by MDHHS or SWMBH clinical policy | MDHHS Master Contract Part II(A) 7.7.3 | SIS assessors | N |
| ASAM | Prior to administering | Booster training as required by MDHHS or SWMBH clinical policy | MDHHS Master Contract Attachment P.II.B.A. | ASAM assessors | N |
| PECFAS ages 4-6 | Prior to administering | Booster training every 2 years | Medicaid Provider Manual 7.2.B | Child mental health professionals | N |
| CAFAS ages 7-17 | Prior to administering | Booster training every 2 years | Medicaid Provider Manual 7.2.B | Child mental health professionals | N |

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Aides – All staff providing Aide services as defined in Michigan PIHP/CMHSP Provider Qualifications Per Medicaid Services & HCPCS/CPT Codes, including, but not limited to, Community Living Supports, Personal Care, Skill Building Assistance, Respite, and Pre- or Non-Vocational Services. Aides serving children on the Children's Waiver for Children with Serious Emotional Disturbance (SEDW) must also be trained in recipient rights and emergency procedures. Aides serving children on the Children's Waiver must be employees of the CMHSP or its contract agency, or be an employee of the parent who is paid through the Choice Voucher arrangement.

Direct Service Personnel – All staff providing direct services to customers.

Specialized Residential Staff – All staff providing services to customers in a specialized residential setting.

BH - Behavioral Health. SUD - Substance Use Disorder