



Section: Provider Network Management	Policy Name: CMH and Provider Training Requirements	Policy Number: 02.15
Owner: Director of Provider Network Management	Reviewed By: Mila C. Todd	Total Pages: 3
Required By: <input checked="" type="checkbox"/> BBA <input checked="" type="checkbox"/> MDHHS <input type="checkbox"/> NCQA <input type="checkbox"/> Other (please specify): _____	Final Approval By: <i>Mila C. Todd</i>	Date Approved: 1/13/2022
Application: <input checked="" type="checkbox"/> SWMBH Staff/Ops <input checked="" type="checkbox"/> Participant CMHSPs <input checked="" type="checkbox"/> SUD Providers <input checked="" type="checkbox"/> MH/IDD Providers <input type="checkbox"/> Other (please specify): <u>MI Health Link</u>	Line of Business: <input checked="" type="checkbox"/> Medicaid <input type="checkbox"/> Other (please specify): _____ <input checked="" type="checkbox"/> Healthy Michigan <input checked="" type="checkbox"/> SUD Block Grant <input checked="" type="checkbox"/> SUD Medicaid <input type="checkbox"/> MI Health Link	Effective Date: 8/4/2014

Policy: It is the policy of SWMBH that all participant CMHSP, and contracted and subcontracted provider staff 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.

Purpose: The purpose of this policy is to ensure that all SWMBH staff, participant CMHSPs, and contracted and subcontracted providers adhere to contractual, state and federal requirements applicable to staff qualifications and trainings pertinent to services provided.

Scope: SWMBH; Participant CMHSPs; contracted and subcontracted providers

Responsibilities: SWMBH, its Participant CMHSPs, contracted and subcontracted providers are responsible for ensuring their staff are appropriately trained.

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.

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.
 - 1. 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),
 - 2. Corporate Compliance,
 - 3. Health Insurance Portability Accountability Act (HIPAA),
 - 4. Recipient Rights,
 - 5. Blood-Borne Pathogens,
 - 6. 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.

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

Attachments:

- A. 02.15A CMH and Provider Training Requirements Matrix
- B. 02.15B Self-Determination Requirements & Training Grid



Revision History

Revision #	Revision Date	Revision Location	Revision Summary	Revisor
1	7/1/2020	N/A	Moved to new template	Mila C. Todd
2	7/1/2020	“Attachments” Section, paragraph B.	Added 2.15B Self-D Training Requirement Matrix.	Mila C. Todd
3	1/13/2022	N/A	Annual Review	Mila C. Todd

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

Training	Initial	Ongoing	Source	Required for	Online Training Acceptable
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://improvingmipractices.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) (MANDT & CPI currently approved)	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

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

Training	Initial	Ongoing	Source	Required for	Online Training Acceptable
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	Y
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

I. Definitions

All – All staff including temporary staff, volunteers and interns.

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

SELF-DETERMINATION REQUIREMENTS & TRAINING GRID

FI must perform annual criminal background checks, and ensure that all individuals who are providing services to beneficiaries pursuant to this Agreement meet the following criteria:

1. Are at least 18 years of age;
2. Are able to prevent the transmission of communicable diseases;
3. Are able to communicate expressively and receptively in order to follow individual plan requirements and beneficiary-specific emergency procedures, and to report on activities performed;
4. Are in good standing with the law (i.e., not a fugitive from justice, a convicted felon who is either under jurisdiction or whose felony relates to the kind of duty to be performed, not an illegal alien);
5. If transporting beneficiaries, ensure that individuals have an appropriate and valid driver's license under State law, and perform primary source verification of State driving infractions prior to service provision and annually thereafter;
6. Complete required trainings as listed in the grid below.

Required Trainings	Initial	Ongoing	Source	Online Training Acceptable
Corporate Compliance	Within 30 days of hire	Annually	Medicaid Integrity Program (MIP) Deficit Reduction Act (DRA)	Y
HIPAA	Within 30 days of hire	Annually	45 CFR 164.308(a)(5)(i) & 45 CFR 164.503.(b)(1)	Y
Recipient Rights	Within 30 days of hire	Annually	MH Code: 330.1755(5)(f) SUD admin rules: R 325.14302	Y - refresher class only.
First Aid	Within 60 days of hire	As required per the training program (usually every 2-3 years)	Medicaid Provider Manual 2.4 & 18.12	N
General Emergency Procedures (fire, tornado, etc.)	Within 30 days of hire	Annually	MDHHS PIHP/CMHSP Provider Qualifications Chart	N
Blood Borne Pathogens (Exposure Control, Prevention of Disease Transmission)	Within 30 days of hire	Annually	MIOSHA R 325.70016	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.	N
Non-Aversive Techniques for Prevention and Treatment of Challenging Behavior (PIHP- approved curriculum if restrictive interventions included) *Only as necessary to implement individual person-centered plans*	Within 60 days of hire	Annually	MDHHS Master Contract Attachment P.1.4.1 and R 330.1806	N

The following trainings must only be completed by Self-Determination employees ***if required by the employer:***

Optional Trainings	Suggested Initial Training Timeframe	Suggested Ongoing Training Timeframe	Online Training Acceptable (Y/N)
Cultural Competency	Within 6 months of hire	Annually	Y
CPR (MDHHS Approved only)	Within 60 days of hire	As required per the training program	N
Limited English Proficiency	Within 6 months of hire	N/A	Y
Medication Administration	Within 90 days of hire or prior to working independently with customer(s)	N/A	N
Trauma Policy Training	Within 60 days of hire.	N/A	Y – on-line module: Creating Cultures of Trauma-informed Care with Roger Fallot, Ph.D. of Community Connections, Washington DC is available at http://improvingmipractices.org for use in training. Other evidence-based curriculums can be utilized.

