



## 02.09 OPERATING POLICY & PROCEDURE

Subject: <b>Training Requirements</b>		Application: <b>All Departments &amp; Providers</b>
First Effective 1/1/014	Revised 11/19/2021	Review 2/13/2023

### I. PURPOSE

To outline the minimum Pivotal training requirements for staff working in Pivotal funded organizations.

### II. DEFINITIONS

#### **Portability**

When the necessary documentation of a current and required training from another Michigan mental health or substance abuse entity is presented to allow entry of the training in the individual's training record.

#### **Training Reciprocity**

The mutual recognition and acceptance of trainings from other Michigan mental health and substance abuse entities in lieu of requiring staff to retake the same training(s) for meeting Pivotal requirements.

### III. POLICY

It shall be the policy of Pivotal:

- A. For all training activity to be designed to promote quality services and the desired outcomes of persons served and to meet the Southwest Michigan Behavioral Health (SWMBH), CCBHC, State and Federal requirements. To accomplish their assigned duties, staff must complete a minimum standard of training.
- B. To promote and utilize efficient processes for training whenever possible. In this context, Pivotal will recognize training(s) that have been provided within the SWMBH and by other Prepaid Inpatient Health Plans (PIHP) provider networks as long as the training meets expected competency and documentation requirements. Pivotal reserves the right to not recognize any training provided by an out-of-network provider.

- C. Staff shall comply with training timeframes both at hire and annually (if applicable). Staff will complete annual training by August 1<sup>st</sup> of every year. IF trainings are not completed timely, staff will not be eligible to see clients until those trainings have been completed. Extreme deficiencies or refusal to complete trainings will result in disciplinary action, up to and including termination.

#### IV. STANDARDS

- A. Pivotal supports the reciprocity and portability of training whenever possible.
1. Pivotal or Pivotal network provider will accept the documented trainings completed by a staff member through another CMH or network providers as long as the staff demonstrates competency in the trained area.
  2. The exceptions to reciprocity include the general orientation of a staff member to the organization and when an incoming staff member was trained in different physical intervention techniques (i.e., CPI) than the prevalent technique (i.e., Mandt) within the service setting. The staff member will be required to complete the prevalent training in order to ensure there is consistency in carrying out emergency physical interventions when needed.
  3. Each training of an individual who worked within another PIHP provider network system and has been hired by Pivotal or a Pivotal network provider will be reviewed prior to extending portability to ensure that it meets the standards of the State and Pivotal. The training record of the individual must indicate the name and signature of the person who conducted the review as well as the review date.
  4. Any training required by Pivotal that has not been completed or documented by the incoming staff, will need to be completed within the specified time frames.
- B. The Training Requirements Chart (exhibit A) outlines the minimum Pivotal staff training requirements. Additional training requirements may be outlined in:
1. Contracts with Service Providers
  2. Pivotal performance improvement initiatives
  3. New Pivotal, SWMBH, CCBHC, State or Federal training mandates
  4. Provider procedure
  5. A deficiency cited through Provider Monitoring Review process which requires additional training to address the deficiency

- C. Documentation of each training session completed must be maintained and include, at least, the following information:
1. Staff member's full name
  2. Topic or subject areas
  3. Date of training
  4. If applicable, an indication of "pass" or "fail"
  5. Instructor's name or source of the CMH approved e-learning course completed
  6. Title of the approved curriculum used in the training course
  7. Phone number to call to verify transcripts
  8. The Training Documentation Form (Exhibit B) may be used for training documentation if the training is not otherwise documented through other means, such as, through the Relias Learning system.
- D. Staff who want to take classes/trainings in excess of the requirements as established by this policy or other agency requirements may need do so on their own time and at their own expense, unless approved by the individual's supervisor.
- E. Pivotal will:
1. Maintain procedures to outline the process for carrying out the required trainings.
  2. Track and ensure the training of each Pivotal staff.
  3. Monitor contract providers and verify that provider staff members are meeting the training requirements.
  4. Assess and identify any other training that may be needed beyond the required trainings.
  5. Make available to staff continuing education and other staff development activities in response to identified training needs.

## V. REFERENCES

- Supplement NO. 4 to the 1987 Department of Mental Health Administrative Rules, Effective March 9, 1996: Part I, Subpart 8, R 330.1806
- Southwest Michigan Behavioral Health Policy
  - 2.15 Provider Training
- Specific trainings with references on Exhibit A: Training Requirement Chart)

## VI. EXHIBITS

A. 2.09A - [Training Requirements Chart](#)