

MCOSA Staff Credentialing Policy

Staff Qualifications for Providing Substance Use Disorder Services

1. Treatment Staff

Individuals providing treatment services to MCOSA funded clients must qualify as a Substance Use Disorder Treatment Specialist (SATS) or a Substance Use Disorder Treatment Practitioner (SATP), along with licensure requirements where indicated below, based on the job function they are providing. Clinical supervisors are also required to meet specific qualifications. The qualifications for the SATS, SATP, and Clinical Supervisor are as follows:

Substance Use Disorder Treatment Specialist (SATS): An individual who has “active” status (no open formal complaints or disciplinary actions) licensure in one of the following areas, and is working within their licensure-specified scope of practice:

- Physician (MD/DO)
- Physician Assistant (PA)
- Nurse Practitioner (NP)
- Registered Nurse (RN)
- Licensed Practical Nurse (LPN)
- Licensed Psychologist (LP)
- Limited Licensed Psychologist (LLP)
- Temporary Limited Licensed Psychologist (TLLP)
- Licensed Professional Counselor (LPC)
- Limited Licensed Professional Counselor (LLPC)
- Licensed Masters Social Worker (LMSW)
- Limited Licensed Masters Social Worker (LLMSW)
- Licensed Bachelor’s Social Worker (LBSW)
- Limited Licensed Bachelor’s Social Worker (LLBSW)

AND, who has a registered development plan with MCBAP and is timely in its implementation, or has one of the following Michigan specific or International Certification & Reciprocity Consortium (IC&RC) credentials:

- Certified Alcohol and Drug Counselor (CADC)
- Certified Alcohol and Drug Counselor – Michigan (CADC-M)
- Certified Advanced Alcohol and Drug Counselor (CAADC)
- Certified Co-Occurring Disorders Professional (CCDP)
- Certified Co-Occurring Disorders Professional – Diplomat (CCDP-D)
- Certified Clinical Supervisor (CCS)
- Certified Criminal Justice Professional – IC&RC (CCJP-R)

State approved alternative credential (ASAM, CHES, APA Specialty in Addition, UMICAD)

Substance Use Disorder Treatment Practitioner (SATP): An individual who has a registered Development Plan, is timely in its implementation and working under the supervision of a SATS or has a MCBAP Counselor certification but does not have state licensure.

Clinical Supervisor: An individual that directly supervises clinical staff and has one of the following credentials:

Michigan Certified Clinical Supervisor (CCS-M)
 Certified Clinical Supervisor (CCS) credential,
 Registered clinical supervisor development plan with MCBAP and is timely in its implementation.

Staff Qualifications – By Service Type

The chart below outlines staff and supervision requirements by program description. It is permissible for staff to exceed qualification requirements.

Program Description	Qualified Staff	Supervision Requirements
<p>Outpatient Psychotherapy</p> <p>Assessment, individual, group, didactic, family therapies, crisis intervention, early intervention. Establishing diagnoses is subject to state licensure scope of practice</p>	<p>Licensed Master Level Clinician with MCBAP Counselor Certification or timely Development plan.</p>	<p>Program supervision provided by a SATS</p> <p>Clinical supervision by a Certified Clinical Supervisor and applicable requirements for individual licensure</p>
<p>Outpatient Case Management</p> <p>Referral, linking, coordinating of services, compliance monitoring.</p>	<p>Bachelor’s Degree in Behavioral Health or related field and SATS or SATP.</p>	<p>Program supervision provided by a SATS or SATP</p> <p>Clinical supervision by Certified Clinical Supervisor and applicable requirements for individual licensure</p>
<p>Peer Recovery/ Recovery Support</p> <p>Provides recovery</p>	<p>Specialty focused staff appropriately trained for individual job duties</p>	<p>Program supervision provided by a SATS</p>

Program Description	Qualified Staff	Supervision Requirements
focused supports and services.		
<p>Medication Assisted Treatment</p> <p>Clinical services include, assessment, individual, group, didactic, family therapies, crisis intervention, early intervention. Establishing diagnoses is subject to state licensure scope of practice</p> <p>Medication administration and medical services are provided by appropriately qualified medical staff.</p>	<p>Licensed Master Level Clinician with MCBAP Counselor Certification or timely Development plan.</p> <p><u>Medication Administration:</u> MD/DO, PA, NP, RN, LPN, pharmacist</p>	<p>Program and administration of drug supervision by MD/DO – ASAM preferred</p> <p>Program supervision provided by a SATS or SATP</p> <p>Clinical supervision by Certified Clinical Supervisor and applicable requirements for individual licensure</p>
<p>Withdrawal Management</p> <p>Clinical and medical services to assist individual with withdrawal management needs.</p>	<p><u>Clinical Services:</u></p> <p>SATS, SATP</p> <p><u>ASAM Level III.2-D:</u> Access to licensed medical personnel</p> <p><u>ASAM Level III.7D:</u> Licensed physician or designated representative 24/7</p> <p><u>Other Services:</u> Appropriately trained staff</p>	<p>ASAM Level III.2-D supervised by CADC or Certified Clinical Supervisor</p> <p>ASAM Level III.7-D Supervised by licensed physician or designated representative of a licensed physician</p> <p>Treatment Program supervision provided by a SATS</p> <p>Clinical supervision by Certified Clinical Supervisor and applicable requirements for licensure</p>
<p>Residential Treatment</p> <p>Structured clinical interventions in a residential treatment</p>	<p><u>Clinical Services:</u> SATS, SATP</p> <p><u>Case Management Services:</u> SATS, SATP</p> <p><u>Other Services:</u> Appropriately trained staff</p>	<p>Clinical program supervised by SATS with licensure as a psychologist, master’s social worker, professional counselor,</p>

Program Description	Qualified Staff	Supervision Requirements
setting, including assessment, group treatment, didactics, lectures, life skills, etc.		MD/DO or marriage and family therapist. Clinical supervision by Certified Clinical Supervisor and applicable requirements for individual licensure
Outpatient - Withdrawal Monitoring:	<u>ASAM Level II-D:</u> monitored by appropriately credentialed and licensed nurses <u>Clinical Addiction Services:</u> SATS <u>Other services:</u> appropriately trained staff	Program supervision provided by SATS Clinical supervision by Certified Clinical Supervisor and applicable requirements for individual licensure
Early Intervention Programs Assessment, individual, group, didactic, family therapies, crisis intervention, early intervention.	Licensed Master Level Clinician with MCBAP Counselor Certification or timely Development plan. Establishing diagnoses is subject to state licensure scope of practice	Program supervision provided by SATS Clinical supervision by Certified Clinical Supervisor and applicable requirements for individual licensure
Peer Recovery and Recovery Support Programs	Appropriately trained staff through CCAR , MDHHS, and/or McBAP Peer Certified	Program supervision provided by a SATS or SATP
Adjunct Services	<u>Acupuncture:</u> appropriately certified and working within scope of practice <u>Other services:</u> work within established scope of practice	Based on individual scope of practice licensure or certification requirements

Additional Definitions

Individual Licensure Requirements: Refers to the supervision requirements set forth in the public health code for each category of licensed professions. The licensed individual is responsible for ensuring that he/she is involved in the appropriate supervision as designated by the licensing rules of his/her profession.

Adjunct Services: Substance use disorder treatment services that can be provided in conjunction with, or independent of, substance use disorder services being provided at the outpatient or residential level of care.

Clinical Addiction Services: Counseling services in substance use disorder treatment that involve individual or group interventions, that have a focus on developing insight into behaviors and developing skills in understanding and changing those behaviors, and that require specially trained and educated clinicians to conduct them. The therapy process is defined as the actions involved in assessment, diagnosis, or treatment of mental, emotional, or behavioral disorders, conditions, addictions, or other bio-psychosocial problems; and may include the involvement of the intra-psychic, intra-personal, or psychosocial dynamics of individuals.

Other Services: Services in substance use disorder treatment that involve directing, assisting, and teaching skills necessary for recovery from substance use disorders to clients.

Supervision: {Public Health Code 333.16109(2)} – The overseeing of or participation in the work of another individual by a health professional licensed under this article in circumstances where at least all of the following conditions exist:

- The continuous availability of direct communication in person or by radio, telephone, or telecommunication between the supervised individual and a licensed health care professional.
- (Comment: This requires that an appropriately licensed supervisor for the individual providing a service be available for consultation at any time an interaction with a client is taking place. For example – if a master’s level psychologist is providing individual counseling five hours a day, the licensed psychologist who is providing supervision to that clinician, must be available to provide consultation to that clinician, during those five hours)
- The availability of a licensed health professional on a regularly scheduled basis to review the practice of the supervised individual, to provide consultation to the supervised individual, to review records, and to further educate the supervised individual in the performance of the individual’s functions.
- The provision by the licensed supervising health professional of predetermined procedures and drug protocol. (*Comment: This addresses procedures relative to the administration of medication and dispensing of medications to clients within substance use disorder programs.*)

Staff Credentialing and Re-credentialing

Programs are required to have staff credentialing and re-credentialing policies and procedures that include the following standards:

Credentialing

The initial credentialing of each individual staff must require:

1. A written application that is complete, signed and dated by the applicant and attests to the following elements:
 - a. Lack of present illegal drug use
 - b. Any history of loss of license and /or felony convictions, as applicable
 - c. Any history of loss or limitation of privileges or disciplinary action, as applicable
 - d. Attestation by the applicant of the correctness and completeness of the application
2. An evaluation of the applicant's work history of the prior five years.
3. A criminal background check as a condition of employment for all potential employees. This requirement is not intended to imply that a criminal record should necessarily bar employment. Documentation is to be made available for review by the SUD Division as requested. At a minimum, checks should take place every two years from when the initial check was made. Criminal background checks must be completed by an organization, service, or agency that specializes in gathering the appropriate information to review the complete history of an individual. Use of the State of Michigan Offender Tracking Information System (OTIS) or a county level service that provides information on individuals involved with the court system are not appropriate resources to use for criminal background checks.
4. For clinical staff, establish and maintain a credentials file on all salaried or contractual staff who are providing clinical services. The credentials file must include, at minimum: academic history with proof of completion; internship, practicum and clinical experience that is supervised, with area of clinical practice, age group and/or special skills learned; employment experience in the form of resume'; copies of professional licenses, certification and registrations; current list of "in-service" training completed, including other professional training experiences pertinent to clinical practice. The credentials file will serve as a support to clinical privileges practiced, which will be listed by date granted in the credentials file and will be made available for review by the SUD Division as requested.

As a delegated function from the PIHP, the Subcontractor will ensure verification from primary sources of:

1. Licensure or certification
2. Board certification, or highest level of credentials attained if applicable, or completion of any required internship/residency programs, or other postgraduate training.
3. Documentation of graduation from an accredited school.
4. National Practitioner Databank (NPDB)/Healthcare Integrity and Protection Databank (HIPDB) query or, in lieu of the NPDB/HIPDB query, all of the following must be verified:
 - a. Minimum five-year history of professional liability claims resulting in judgment or settlement.
 - b. Disciplinary status with regulatory board or agency: and
 - c. Medicare/Medicaid sanctions
5. If the individual undergoing credentialing is a physician, then physician profile information obtained from the American Medical Association may be used to

satisfy the primary source requirements of a-c above.

The Subcontractor must comply with Federal requirements that prohibit employment or contracts with individuals excluded from participation under either Medicare or Medicaid. (A complete list of Centers for Medicare and Medicaid Services (CMS) sanctioned providers is available on their website at <http://exclusions.oig.hhs.gov>. A complete list of sanctioned providers is available on the Michigan Department of Community Health website at www.michigan.gov/mdch -Click on Providers, click on Information for Medicaid Providers, click on List of Sanctioned Providers).

MCOSA, as the PIHP, in delegating the responsibilities of credentialing/re-credentialing to the Subcontractor, retains the right to approve, suspend, or terminate from participation in the provision of Medicaid funded services an individual selected by the Subcontractor.

Re-credentialing

The Subcontractor must have policies that address the re-credentialing process and include requirements for each of the following:

1. Re-credentialing at least every two years.
2. An update of information obtained during the initial credentialing.
3. A process for ongoing monitoring, and intervention if appropriate, of provider/clinician sanctions, complaints and quality issues pertaining to the provider/clinician, which must include, at a minimum, review of:
 - a. Medicare/Medicaid sanctions
 - b. State sanctions or limitations on licensure, registration, or certifications
 - c. MCBAP certification standing or registered development plan status
 - d. Client concerns which include grievances (complaints) and appeals information
 - e. PIHP/SUD Division Quality issues

2. Prevention Staff

Staff Qualifications – By Service Type

The chart below outlines staff and supervision requirements by program description. It is permissible for staff to exceed qualification requirements.

Staffing Category	Description	Certification Requirement
Program Supervisory Staff	General prevention program oversight and staff supervision responsibilities	Certified Prevention Consultant certification required, or has a registered development plan with MCBAP and is timely in its implementation. (CPC-R or CPC-M)

Staffing Category	Description	Certification Requirement
Specialist//Professional	Prevention staff with responsibilities for development and implementation of plans and services with responsible service areas at regional or local levels	Certified Prevention Specialist certification required, or has a registered development plan with MCBAP and is timely in its implementation. (CPS-R or CPS-M)
Specially Focused Staff	Individuals responsible for implementing a specific EBP curriculum or carrying out prevention related activities under the direction of other staff	Certification not required

For prevention staff, establish and maintain a credentials file on all salaried or contractual staff who are providing prevention services. The credentials file must include, at minimum:

- a. academic history with proof of completion
- b. internship, practicum, or supervised training in specific prevention curriculum
- c. community organization and/or information/communications related to the prevention services the job position is to provide
- d. employment experience in the form of a resume
- e. copies of professional licenses as applicable
- f. certification and/or development plan registrations
- g. a current list of “in-service” training completed

A criminal background check must be completed as a condition of employment for all potential employees. This requirement is not intended to imply that a criminal record should necessarily bar employment. At a minimum, checks should take place every two years from when the initial check was made.

The credentials file will be made available for review by the SUD Division as requested.