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Policy Number: A013	Subject/Title: SUD Treatment & Prevention Staff Certification and Qualifications Requirements		Replaces: August 2004 Last Reviewed: May 2009
Issued By: Executive Director	Approved By: Board of Directors	Scope: All Treatment & Prevention Providers	Effective: 06/22/2009
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1. **POLICY**

This policy is to ensure appropriately qualified, credentialed, and professionally licensed staff are providing substance use disorder (SUD) treatment and prevention services to Mid-South's funded clients and prevention efforts consistent with ODCP's and Medicaid's standards for education, licensure, and credentialing.

2. **PURPOSE**

- 2.1. To describe the required qualifications of staff providing direct SUD treatment services to clients who are paid with state and/or Medicaid funds.
- 2.2. To describe the required qualifications of staff coordinating the local prevention coalitions and/or providing direct prevention services.

3. **MID-SOUTH'S RESPONSIBILITIES**

- 3.1. Assure required staff qualifications are met by the contracted SUD treatment and prevention providers through Mid-South's monitoring activities.
- 3.2. Annually review the Michigan Certification Board for Addiction Professionals' (MCBAP) website, www.mcbap.com, to verify that contacted prevention staff have completed certification or continue making progress on certification consistent with their development plan.
- 3.3. Assure that criminal background checks are conducted as a condition of employment for contracted SUD treatment provider employees.
 - 3.3.1. Although criminal background checks are required, it is not intended to imply that a criminal record should necessarily bar employment.
 - 3.3.2. The verification of these checks and a justification for the decisions made must be documented in the employee personnel or interview file.
- 3.4. Annually ensure contracted SUD treatment providers have not been excluded from Medicaid or Medicare participation through review of the national and state sanction and debarment websites.

4. **SUD TREATMENT and PREVENTION PROVIDERS' RESPONSIBILITIES**

- 4.1. Assurance that staff qualification requirements are met.
- 4.2. Verifying the certification status of the employee. This includes verification of the credential(s), monitoring staff development plans, and compliance with continuing education requirements. However, it is the individual's responsibility for achieving and maintaining his or her certification.

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- 4.3. Contracted prevention providers are to submit a list of prevention staff as part of the county's annual plan. Contracted prevention providers are also responsible for verifying subcontracted prevention providers' staff have the appropriate prevention certification.
- 4.4. To ensure the appropriate degreed, licensed, and credentialed SUD treatment staff are providing treatment services to Mid-South funded clients. Refer to the Staff Qualifications by Service Type and Billing Codes.
- 4.5. Submit to Mid-South, during the annual contracting process, the Verification of Clinical Staff Qualifications, Form A105 and the Confirmation of Qualifications and Training of All Professional Staff, Form A106.
- 4.6. Submit within 30 days of hire the New Employee Verification Form, Form A107.
- 4.7. Maintain copies of current professional licensure, credentialing, criminal background results, and appropriate staff education in staff personnel files for review upon Mid-South's request.

5. CERTIFICATION PROCESS

- 5.1. MCBAP's certification requirements apply to all Mid-South contracted providers for services directed to the prevention and treatment of substance use disorders. This includes staff working for or within local governmental units such as intermediate school districts, local health departments, or community mental health service board programs when these are under contract to Mid-South as a provider, depending on the scope of their work, as described in Section 8 of this policy.
- 5.2. MCBAP certification requirements apply on the basis of staff role and responsibility regardless of employee status or type.
 - 5.2.1. Examples of employee status include: direct employee, contractual, or volunteer.
 - 5.2.2. Examples of type include: full time, part time, intermittent, or seasonal.
- 5.3. An individual's certification requirements are determined on the basis of each of their job responsibilities. For example, an individual functioning as a case manager (certification not required) and as a treatment clinician would be required to be certified even though a portion of their responsibilities include functions for which certification is not required.
- 5.4. Individuals who are timely in the process of completing their registered development plan for the specified credential are considered to meet certification requirements.
 - 5.4.1. For example, a recent MSW graduate working in a position providing treatment to persons with substance use disorders with an approved development plan would be considered to meet certification requirements.
 - 5.4.2. Development plans are required to include time frames, milestones, be date-specific, and appropriate to the experience requirements associated with the certification credential.

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5.4.2.1. A development plan is considered timely when there is evidence that steps or activities included in the development plan are being implemented and can be expected to be completed within a reasonable period of time.

5.4.2.2. The supervisor of the individual is responsible for regularly monitoring the status of the development plan. MCBAP maintains a list of individuals who have an active development plan. This can be accessed through their website at www.mcbap.com.

5.5. Accepted equivalent credentials to MCBAP certification are as follows:

5.5.1. For prevention: Certified Health Education Specialist (CHES) through the National Commission for Health Education Credentialing.

5.5.2. For treatment: Certification through the Upper Midwest Indian Council on Addiction Disorders (UMICAD).

5.5.3. For medical doctors: American Society of Addiction Medicine (ASAM).

5.5.4. For psychologists: American Psychological Association (APA) specialty in addiction.

6. MCBAP PREVENTION CERTIFICATION REQUIREMENT

6.1. **Prevention Professional:** An individual who has one of the following MCBAP or International Certification & Reciprocity Consortium (IC&RC) credentials:

6.1.1. Certified Prevention Specialist – Michigan (CPS-M).

6.1.2. Certified Prevention Consultant – Michigan (CPC-M).

6.1.3. Certified Prevention Specialist – IC&RC (CPS-R).

6.1.4. Certified Prevention Consultant – IC&RC (CPC-R).

6.1.5. An individual who has an approved Alternative Certification: Certified Health Education Specialist (CHES) through the National Commission for Health Education Credentialing (NCHEC) is accepted as an equivalent credential.

6.1.6. An individual who has a registered development plan, for a CPS credential, and is timely in its implementation leading to certification.

6.2. **Prevention Supervisor:** An individual who has one of the following MCBAP or International Certification & Reciprocity Consortium (IC&RC) credentials:

6.2.1. Certified Prevention Consultant – Michigan (CPC-M).

6.2.2. Certified Prevention Consultant – IC&RC (CPC-R).

6.2.3. Certified Prevention Specialist – Michigan (CPS-M).

6.2.4. Certified Prevention Specialist – IC&RC (CPS-R) – only if credential effective prior to 10-01-2008.

6.2.5. An individual who has an approved Alternative Certification: Certified Health Education Specialist (CHES) through the National Commission for Health Education Credentialing (NCHEC) is accepted as an equivalent credential.

6.3. Prevention certification requirements do not apply to staff solely engaged in:

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- 6.3.1. Synar tobacco compliance checks or vender education.
- 6.3.2. Provision of communicable disease education and prevention services.
 - 6.3.2.1. Refer to Communicable Disease Requirements, Policy A005 for information about communicable disease staff training requirements.

7. MCBAP TREATMENT CERTIFICATION REQUIREMENTS

- 7.1. Substance Abuse Treatment Specialist (SATS): An individual who has licensure in one of the following areas **AND** is working within his or her licensure-specified scope of practice:
 - 7.1.1. 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 Counselor (LLC), Licensed Marriage and Family Therapist (LMFT), Limited Licensed Marriage and Family Therapist (LLMFT), Licensed Masters Social Worker (LMSW), Limited Licensed Masters Social Worker (LLMSW), Licensed Bachelor's Social Worker (BSW), or Limited Licensed Bachelor's Social Worker (LLBSW);
 - 7.1.2. **AND** they have a registered development plan and are timely in its implementation leading to certification.
 - 7.1.3. **OR** they are functioning under a time limited exception plan approved by the CA as detailed in Sections 8.4.2. and 9.1.5.
 - 7.1.4. **OR** – An individual who has one of the following Michigan specific (MCBAP) or International Certification & Reciprocity Consortium (IC&RC) credentials:
 - 7.1.4.1. Certified Addictions Counselor – Michigan (CAC-M).
 - 7.1.4.2. Certified Addictions Counselor – IC&RC (CAC-R).
 - 7.1.4.3. Certified Advanced Addiction Counselor – IC&RC (CAAC).
 - 7.1.4.4. Certified Criminal Justice Professional – IC&RC – (CCJP-R).
 - 7.1.4.5. An individual who has an approved Alternative Certification: For medical doctors: American Society of Addiction Medicine (ASAM); For psychologists: American Psychological Association (APA); and Certification through the Upper Midwest Indian Council on Addiction Disorders (UMICAD) are accepted as equivalent credentials.
 - 7.1.5. A Physician (MD/DO), Physician Assistant (PA), Nurse Practitioner (NP), Registered Nurse (RN) or Licensed Practical Nurse (LPN) who is not providing treatment services to clients beyond the scope of practice of their licensure are considered to be Specifically Focused Treatment Staff and are not required to obtain the MCBAP credentials. If one of these individuals wanted to provide substance use disorder treatment services to clients, outside the

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scope of their licensure, then the MCBAP certification requirements would apply.

- 7.2. Substance Abuse Treatment Practitioner (SATP): An individual who has a registered MCBAP certification development plan that is timely in its implementation AND is supervised by an individual with a CCS-M, CCS-R or a registered development plan to obtain the supervisory credential, while completing the requirements of the plan (6000 hours).
- 7.3. Treatment Supervisor: An individual who has one of the following MCBAP or International Certification & Reciprocity Consortium (IC&RC) credentials:
 - 7.3.1. Certified Clinical Supervisor – Michigan (CCS-M).
 - 7.3.2. Certified Clinical Supervisor – IC&RC (CCS-R).
 - 7.3.3. An individual who has an approved Alternative Certification: For medical doctors: American Society of Addiction Medicine (ASAM); For psychologists: American Psychological Association (APA) are accepted as equivalent credentials.
 - 7.3.4. OR – An individual who has a registered development plan, for the supervisory credential and is timely in its implementation leading to certification.
- 7.4. The MCBAP certification requirements do not replace state licensure scope of practice and supervision requirements for health care professionals such as social workers, counselors, or psychologists.

8. MCBAP STAFF CERTIFICATION REQUIREMENTS – By Staff Function

- 8.1. In order to be considered meeting MCBAP’s certification requirements, all individuals performing staff functions outlined below must:
 - 8.1.1. Be certified appropriate to their job responsibilities under one of the credentialing categories or an approved alternative credential; or
 - 8.1.2. Must have a registered development plan and be timely in its implementation; or
 - 8.1.3. Be functioning under a time limited exception plan approved by Mid-South as described in Sections 8.4.2. and 9.1.5.
- 8.2. Staff functions for which these requirements apply are Prevention Professionals, Prevention Supervisors, Treatment Specialists, Treatment Practitioners, and Treatment Supervisors. Refer to the Job Function, Supervision and MCBAP Requirements chart. It is intended to assist in the determination of MCBAP certification requirements for the SUD treatment and prevention contracted providers.
- 8.3. Individuals with staff functions outlined below are not required to be MCBAP certified, but these services must be provided under the supervision of staff credentialed by MCBAP (or an approved alternative certification).
 - 8.3.1. Specifically Focused Treatment Staff: This category includes Case Managers, Recovery Support Staff, as well as staff who provide didactic or other health care services such as nurses, occupational therapists, psychiatrists, and children’s services staff in women’s specialty

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programs. Licensing requirements may apply depending on the nature of the work duties and scope of practice.

- 8.3.2. Specifically Focused Prevention Staff: Staff that consistently provide a specific type of prevention service. They do not have responsibilities for implementing a range of prevention plans, programs, or services.
- 8.3.3. Treatment Adjunct Staff: Commonly described as: Resident Aide, Pharmacy Techs, Child Care Aides, program aides/techs, or peer supports. Adjunct staff are involved with the client but not at a clinical treatment services level. It is recognized that some treatment adjunct staff provide didactic or skill development services. Licensing requirements may apply to adjunct staff depending on the nature of the work duties and scope of practice. They may also work under the direction of appropriately licensed and/or credentialed staff.
- 8.3.4. Interns for the Provision of Services: Interns are individuals who, as part of an educational curriculum while in the process of obtaining a degree related to the substance use disorder field, provide prevention or treatment services to clients. These services must be provided under the supervision of a MCBAP treatment credentialed staff (or an approved alternative certification) and any specific licensing requirements for the degree being sought. All services provided by interns may be allowable and billable as long as the intern is being appropriately supervised.
- 8.4. Certification Requirements for Temporary or Supervisory Assignments are described below.
 - 8.4.1. Cross-over work assignments occur in those situations when an individual staff's roles and responsibilities have different MCBAP certification requirements on a temporary, time-limited basis (less than 120 days).
 - 8.4.1.1. Temporary work assignments include: working out of class, temporary assignments to a higher or different position during the time required to fill a vacancy, providing coverage for a staff person on leave status, or similar situations.
 - 8.4.1.1.1. Examples of temporary work assignments are: assignment of a treatment clinician to clinical supervisory responsibilities or a prevention professional assigned to supervisory prevention activities due to a vacant position or employee leave of absence.
 - 8.4.1.2. During the temporary work assignment period, the individual performing the duties of the absent/vacant staff position will not be required to meet the MCBAP certification requirement for that temporary position.
 - 8.4.1.3. However, the individual with the temporary work assignment must have the certification or development plan appropriate to their current roles and responsibilities.
 - 8.4.1.3.1. For example, an individual temporarily assigned to clinical supervision would be required to be treatment-certified and an individual assigned to prevention supervisory responsibilities would be expected to be prevention-certified.
 - 8.4.2. Should a situation arise with an established contracted SUD treatment or prevention provider

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where there are no longer employees available that meet the credentialing requirements, the provider and Mid-South will be responsible for developing a “time-limited exception plan” appropriate to the situation to ensure established clients with the provider continue to receive services.

8.4.2.1. An example of such a situation would be a provider that has one or more credentialed clinicians leave resulting in the remaining staff not being able to provide services to the clients. Mid-South and provider will enter into an exception plan agreement where a qualified but non-credentialed person can provide services to those clients until credentialed staff are hired, return from leave, etc.

8.4.2.2. The length of the plan should be adequate to serve the immediate need of the affected clients but should not exceed 120 days in an initial agreement. For administrative efficiency, when providers participate in multiple CA provider panels, the affected CAs should jointly determine an appropriate exception plan.

9. SUPERVISION OF SUD TREATMENT and PREVENTION STAFF

9.1. Program Supervision: An administrative function that ensures agency compliance with laws, rules, regulations, policies, and procedures that have been established for the provision of SUD prevention and treatment services.

9.2. 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.

9.3. Individual/Clinical Supervision: Refers to the intervention that is provided by a senior member of a profession to a junior member or members of the same profession. This service is focused on enhancing the professional functioning of the junior member(s) and monitoring the quality of the professional services offered to clients by the junior member(s).

9.4. In Michigan, to provide supervision in the substance use disorder prevention and treatment fields, an individual must have one of the following MCBAP credentials or an established development plan leading to certification in one of the credentials:

9.4.1. Certified Prevention Consultant – Michigan (CPC-M).

9.4.2. Certified Prevention Consultant – IC&RC (CPC-R).

9.4.3. Certified Prevention Specialist – Michigan (CPS-M).

9.4.4. Certified Prevention Specialist – IC&RC (CPS-R) – Note restriction in Section 6.2.

9.4.5. Certified Health Education Specialist (CHES) through the National Commission for Health Education Credentialing (NCHEC).

9.4.6. Certified Clinical Supervisor – Michigan (CCS-M).

9.4.7. Certified Clinical Supervisor – IC&RC (CCS-R).

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9.4.8. For medical doctors: American Society of Addiction Medicine (ASAM).

9.4.9. For psychologists: American Psychological Association (APA).

9.5. When the contracted SUD treatment or prevention provider does not have any suitable employee available, or does not have the capacity to meet the supervision requirements, the provider and Mid-South are responsible for developing and implementing a “time-limited exception plan”. Mid-South and the provider will enter into an exception plan agreement where a qualified but non-credentialed person can provide adequate and appropriate supervision services to those credentialed staff currently providing services to clients.

9.5.1. The length of the plan should be adequate to serve the immediate need of the provider and clients but should not exceed 120 days in an initial agreement.

9.5.2. Supervisory exception plans may include purchase of supervisory services on a short-term basis, cross-CA or provider staff support or other actions appropriate to the situation and health care professional licensure requirements. For administrative efficiency, when providers participate in multiple CA provider panels, the affected CAs should jointly determine an appropriate plan.

References:

Staff Qualifications by Service Type and Billing Code

Verification of Clinical Staff Qualifications – Form A105

Confirmation of Qualifications and Training of All Professional Staff – Form A106

New Employee Verification – Form 107

Communicable Disease Requirements - Policy A005

Job Functions, Supervision, and MCBAP Requirements Chart

MCBAP website – www.mcbap.org