



# **Community Behavioral Health Manual for Review of Provider Personnel Files (MRPPF) 2.2 March 5, 2020**

**Please note that this Manual contains links and descriptions for Behavioral Health Rehabilitative Services (BHRS)-specific positions. Additional changes and updates for Intensive Behavioral Health Services (IBHS) are forthcoming.**

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# 1. INTRODUCTION

This Manual is designed to be a source for information about requirements to positions most common in the CBH Network. This includes, but is not limited to, required education, experience, licensure, trainings, clearances and supervision. The requirements in this document represent the minimum qualifications for a position. The contents of this Manual are not exhaustive. While every attempt has been made to provide the most current material possible, providers are responsible for staying up-to-date regarding ongoing changes. For requirements specific to specialized procurements or agreements, refer to the procurement document. Providers must adhere to all CBH, State, and Federal mandates for requirements, including training and staffing ratios, where required. **Additional changes for IBHS are forthcoming.**

## Publication History

Document	Date
MRPPF 2.2 (added IBHS disclaimer)	March 5, 2020
MRPPF 2.1 (link updates)	March 4, 2020
MRPPF 2.0	February 27, 2020
Supplement 2 to the MRPPF	April 5, 2019
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MRPPF 1.1	August 21, 2014
MRPPF 1	February 21, 2014
CBH Credentialing Manual Appendices B and C	April 21, 2004

## Provider Responsibility

*Providers are solely responsible for hiring staff that are qualified for their respective positions. It is expected that all staff are qualified, per CBH, State, and Federal Guidelines.*

Provider personnel files are monitored by the CBH Compliance Division. The Network Improvement and Accountability Collaborative (NIAC) may also request and review specific staff files during NIAC visits. Personnel identified as not meeting the minimum qualifications of the position will not be permitted to work in that position with individuals receiving services through CBH. The provider may not be reimbursed for services provided by unqualified staff.

Providers must maintain credentialing files. These records must provide clear evidence that the employee meets the minimum qualifications of their position. If an employee has more than one position within the agency, the employee file must provide evidence that they meet the qualifications of all positions held. If an employee changes positions within the agency, their personnel file must be updated to reflect this change and include all documentation supporting the requisites of their new position.

CBH may review personnel files of staff that provide direct care, therapeutic care, peer support, or are included within the recovery process. These include, but are not limited to:

- Full-time and part-time personnel
- Fee-for-service and per diem personnel
- Consultants
- Subcontracted employees
- Students / interns
- Independent practitioners

## Formatting

For those positions with job requirements specific to CBH, all requirements are noted in detail. In cases where CBH is on par with the Commonwealth or Federal guidelines, a link to the requirement is provided, and the requirements in the original source material should be followed. Similarly, for training and supervision requirements, original source material should be consulted if there is no specific CBH standard listed.

## Nomenclature

The job titles stated in this manual are associated with minimum requirements that are, in some cases, named differently at the provider level. For instance, the Mental Health Professional (MHP) is frequently known as a therapist. For those positions in which the job title differs from that of this manual, the duties stated in the provider job description will be closely reviewed to ensure that they are properly credentialed for the position in which they are employed. In other instances, there are positions, such as Substance Abuse Counselor, which have a precise meaning from a regulatory standpoint. A job title such as this will be consistent across providers and funding sources.

## Types of Providers

CBH's network of providers includes practitioners in private practice (also known as independent practitioners), practitioners in group practices, and provider organizations or facilities, per the following definitions:

- Independent/Individual Practitioner: a clinician (psychiatrist, psychologist, licensed clinical social worker) who provides behavioral healthcare services and bills under their own Taxpayer Identification Number.
- Group Practice: a practice contracted with CBH as a group entity and as such bills as a group entity for the services performed by its CBH-credentialed clinicians.
- Facility: an organization, or program within a parent organization, licensed by the state of Pennsylvania to provide behavioral health services. Examples of facilities include, but are not limited to, psychiatric hospitals, partial hospital programs, mental health clinics, residential treatment facilities, substance use disorder clinics, and rehabilitation providers.

**This document applies exclusively to facilities as described above.** Independent and group practice providers should refer to the Section 2. Credentialing of the [CBH Provider Manual](#).

## 2. DOCUMENTATION REQUIREMENTS

**Within each staff file, providers will maintain the following documentation:<sup>1</sup>**

- **Resume/curriculum vitae or application for employment**
- **Job Description**  
Includes job title, requisite skills, education and experience, tasks and responsibilities of the job. This should be signed and dated within one week of the start date, by both employer and employee.
- **Verification of relevant previous employment**  
Staff files will contain the necessary verifications from prior employers. All required work experience respective to the positions in this Manual must be verified. All employment verifications must verify, at minimum:
  - Information that is congruent with the resume/curriculum vitae or application
  - Position held
  - Dates of employment, including month and year

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<sup>1</sup> Note: A **verified** copy is required for all original documents. Verification requires an authorized staff person's signature, date, and the phrase "original seen" legibly written on the copied document. This applies to electronic records as well. The original must be seen before the document is scanned for electronic storage and must be clearly noted as such on the copy that is scanned.

- Job responsibilities (this information should be obtained whenever possible, especially when the position title is unclear. If this information cannot be obtained, the reason should be noted)
- Employment verifications, which must come from a representative from human resources, supervisor/director equivalent, or person of clear authority from the previous employer. This person’s name, title, and relationship to the employee must be documented

A provider may accept employment verifications in the form of letters if all of the above information is present and the authenticity of the letter is verified

Files for employees contracted through a third party (e.g. a staffing agency) must contain the current employment contract, indicating the effective dates and position(s) for which the person is contracted. This may be in lieu of a performance evaluation.

- **Current valid licenses and/or certifications,**  
When applicable (e.g. BSL, Psychologist, etc.)
- **Confirmation of minimal educational degree status**  
A transcript must be included if the degree does not indicate the field of study (e.g. “Master of Education” instead of “Master of Education in Counseling Psychology”). Providers are encouraged to make transcript reviews routine.
- **Evidence of degree verification of all foreign-trained staff**  
By an accredited educational verification agency (e.g. Education Commission on Foreign Medical Graduates, World Educational Service, or other National Association of Credential Evaluation Services members). The degree standards must satisfy the credentialing requirements for U.S.-obtained degrees.
- **Pennsylvania State Criminal History Report and, when applicable, Pennsylvania Child Abuse Clearance and FBI Criminal History Report**  
(See Appendix A)
- **Evidence of the completion of mandatory initial and ongoing trainings**  
(See Appendix B)
- **National Practitioner Data Bank query**  
Updated every five years for all Licensed Behavioral Specialist Consultants, physicians, physician assistants, and certified nurse practitioners.

- **Insurance Requirements**  
Requirements for health care practitioners are \$1,000,000 per occurrence and \$3,000,000 aggregate. Providers/practitioners enrolled in MCARE meet this requirement and are therefore obligated only to demonstrate valid enrollment in MCARE.

### 3. JOB DESCRIPTIONS

#### Behavioral Health Consultant (Federally Qualified Health Center)

[\[Medicaid State Plan Amendment #: PA-18-0015\]](#)

#### Behavior Specialist Consultant (non-ASD specific)

- Behavioral Specialist Consultant, PA Licensed (BSL).

**OR**

- Any of the following licensed professionals: Psychologists, Social Workers, Clinical Social Workers, Marriage and Family Therapists, and Professional Counselors.

**OR**

- Master's degree from an accredited university in a clinical mental health discipline such as psychology, counseling, clinical social work, psychiatric nursing, and/or marriage and family therapy. Degree must include clinical coursework in the foundations of behavioral health and the provision of mental health services (e.g. individual, group and family therapy, cognitive behavioral therapy, psychodynamic therapy, crisis counseling, abnormal psychology, psychopathology, assessment, child development, personality theory, psychotherapy lab, clinical practicum). Other courses may be considered as determined by a transcript/syllabi review. For a degree to count as a mental health degree, the degree must contain at least twelve (12) credit hours in core behavioral health coursework as defined above. No more than three (3) of these twelve (12) credit hours can be derived from a supervised clinical mental health practicum experience (teaching/education/non-clinical practicum experiences will not count). Courses such as statistics, program and policy development, and program administration will not be counted as behavioral health courses; they do not include instruction in the direct provision of mental health services. If coursework is part of a medical degree, there must be clear evidence that the course was directly related to the diagnosis and treatment of mental health disorders rather than medical conditions. Appropriate

medical degrees/training will include substantial training in mental health disorders; medical degrees that are behavioral health-related usually include a residency in psychiatry.

- **PLUS** at least two years verified post-master's experience providing behavioral health treatment to children (at least one of which is experience using behavior analysis/modification techniques).

Regular/documented clinical supervision from a supervisor meeting the criteria for licensed psychologist.

[Medical Assistance Bulletin #01-94-01, Commonwealth of Pennsylvania,  
Department of Public Welfare]

(Additional CBH requirements)

## **Certified Peer Specialist Certified Peer Specialist Supervisor**

[\[Pennsylvania Certification Board\]](#)

## **Certified Registered Nurse Practitioner**

- A current and valid Certified Registered Nurse Practitioner license with the Commonwealth of Pennsylvania Board of Nursing.
- An appropriate clinical certification in psychiatry/mental health.
- Evidence of prescriptive authority. A current and valid Drug Enforcement Administration (DEA) certificate only if authorized to prescribe controlled substances (Schedules II-V).
- A current collaborative agreement (approved by the State) with a licensed physician/psychiatrist who serves in a supervisory and consultative capacity for the indicated population and level of care.
- A document outlining the scope of services to be provided.

(CBH requirement)

## **Clinical Laboratory Director Clinical Laboratory Supervisor Clinical Laboratory Technologist**

[\[28 PA Code § 5\]](#)

## Clinical Supervisor

- A licensed mental health clinician, including psychiatrists, psychologists, licensed professional counselors, licensed marriage and family therapists, and licensed clinical social workers.

**OR**

- Mental Health Professional requirements (see section)
- **PLUS** a minimum of two (2) years verified post-master's paid experience providing behavioral health treatment of a clinical nature, including psychotherapy, counseling, and assessment. If the supervisor is supervising clinicians treating children, the experience must be with children.

(CBH requirement)

## Intensive Case Manager Intensive Case Manager Supervisor

[\[55 Pa Code § 5221\]](#)

## Intern (Student)

An internship or practicum is a component of a master's or doctoral program that requires a set number of supervised hours as an intern in order to graduate from the program. Once the employee has graduated from the master's or doctoral program and is not enrolled in a program requiring an internship, that person is no longer qualified to be an intern.

The intern's designated supervisor (at the provider) is fully responsible for legal and clinical content of the services delivered and corresponding documentation by the intern. The supervisor must co-sign all documentation completed by an intern. The supervisor must be appropriately credentialed according to the requirements of the services required.

An intern must meet the following minimum qualifications and have the following documentation within their personnel file:

- Must be fully enrolled in an accredited college/university in a degree-conferring program in a field of study consistent with the clinical internship held *and* at a point in their course of study that allows them to be successful in the internship.
- Official transcript. (In lieu of the official transcript, CBH will accept a signed letter or e-mail from the registrar, the student's academic advisor, or the instructor responsible for

supervising the practicum or internship class. The following information must be included: the name of the degree program in which the student is participating, the number of credits obtained at the time of placement, a statement that the student is participating in the field placement as part of the degree program and the anticipated placement dates.)

- Affiliation agreement with the placing school.
- Name and phone number of the school liaison.
- The provider supervisor must be identified.
- A statement concerning the liability insurance which covers the student, listing the amount the agency is insured for. For students who have their own insurance, and/or are covered by their school policy, the details, including the amount, should be in the file.

[\[Provider Notification: Documentation and Training for Interns, August 15, 2017\]](#)

(CBH requirement)

## Licensed Behavior Specialist (ASD)

[\[49 PA Code § 18\]](#)

## Licensed Behavior Specialist (ASD), providing Applied Behavior Analysis (ABA)

- Licensed Behavior Specialist Consultant (BSC) with at least one year, full-time equivalent, post-master's degree experience implementing ABA programs for individuals with ASD less than 21 years of age.

**OR**

- Licensed professional (e.g. psychologist, social worker, clinical social worker, marriage and family therapist, or professional counselor). Note: these roles do not require dual licensure to perform these services.
- **PLUS** Must complete the state approved Functional Behavioral Analysis (FBA) training.

**Note:** a BCBA® credential is preferred, in conjunction with the licenses listed above.

Supervision requirement: The Licensed BSC-ASD providing ABA services, who is not also certified as a BCBA®, will abide by the BACB's supervision structure as if they were in the process of obtaining BCBA® certification. A non-certified BSC-ASD must obtain supervision by a BCBA® or BCBA-D®, with supervision credentialing by the BACB. BSC-ASDs must receive

enhanced supervision for the equivalent of 5% of their total clinical hours worked per supervision period. At least 50% of these hours must be in-person, individual supervision. The remaining 50% may be in small groups of no more than 10 people. The BSC-ASD must review each case that they are working on at least once monthly during supervision sessions.

[\[Applied Behavior Analysis Performance Standards 2.0, Community Behavioral Health, February 2019\]](#)

## Medical Director

- Degree in medicine or osteopathy from an accredited school of medicine or osteopathy in the United States of America.

**OR**

- A valid medical degree from a foreign school of medicine.
- **PLUS** evidence of successful completion of the Educational Commission for Foreign Medical Graduates (ECFMG) examination.

**AND**

- American Board of Psychiatry and Neurology, Inc. diplomate in general psychiatry and/or child and adolescent psychiatry as indicated.
- Current and valid Pennsylvania medical license.
- Valid and current Drug Enforcement Administration (DEA) certification.
- Three (3) years of administrative experience.
- Must be employed by the agency no less than twenty (20) hours per week.

(CBH requirement)

## Mental Health Professional

[\[Regulation #14-538: Outpatient Psychiatric Services and Psychiatric Outpatient Clinics, June 4, 2019; 55 Pa. Code §§ 1153 & 5200, July 18, 2019\]](#)

## Mental Health Worker (Acute Inpatient)

- Bachelor's degree from an accredited program in an area of human services, which includes, but may not be limited to the following: psychology, sociology, political science, counseling, criminal justice, pastoral counseling, elementary/special education, or family therapy.

**OR**

- High school diploma or General Education Development (GED) equivalent.
- **PLUS** a minimum of 2 years of experience (paid or unpaid) in a human service field. This experience must involve direct contact with the individual receiving services (i.e. coaching, teaching, case management, etc.).

(CBH requirement)

### **Mobile Therapist (BHRS)/Lead Clinician (STS)**

- Must be licensed as one of the following:<sup>2</sup> psychiatrist, psychologist, professional counselor, marriage and family therapist, academy of certified social workers, licensed social worker, and/or licensed clinical social workers. Licensed clinicians, as defined above, will not be required to demonstrate coursework or experience requirements. Supervision requirements should be determined by the licensing body.

**OR**

- If not possessing one of the licenses above: master's degree from an accredited university in a clinical mental health discipline, such as psychology, counseling, clinical social work, psychiatric nursing, and marriage and family therapy. The degree must include clinical coursework in the foundations of behavioral health and the provision of mental health services, i.e. individual, group and family therapy, cognitive behavioral therapy, psychodynamic therapy, crisis counseling, abnormal psychology, psychopathology, assessment, child development, personality theory, psychotherapy lab, clinical practicum, etc. Other courses may qualify as determined by review of transcript/syllabi. In order for a degree to count as a mental health degree, the degree must contain at least 12 credit hours in core behavioral health coursework as defined above. No more than three of these 12 credit hours can be derived from a supervised clinical mental health practicum experience (teaching/education/other non-clinical practicum experiences will not count). Courses such as statistics, program and policy development, and program administration will not be counted as behavioral health courses because they do not include instruction in the direct provision of mental health services. If coursework is part of a medical degree, there must be clear evidence that the course was directly related to the diagnosis and treatment of mental health disorders rather than medical conditions. In order for a Medical degree to count for an MHP, the individual must have completed least 12 continuing education credits in

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<sup>2</sup> Licensed BSC is not a mental health professional license and does not apply here.

mental health-related topics that are accredited for counselors, social workers, marriage and family therapists, and psychologists must be completed. Also accepted is evidence of medical degrees that are behavioral health-related and usually include a residency in psychiatry.

- **PLUS** at least one year verified paid post-master's experience providing psychotherapy/counseling to children.

Mobile Therapists and Lead Clinicians must have formal training in the provision of psychotherapy.

Regular/documented clinical supervision from a supervisor meeting the criteria for Clinical Supervisor is required.

[Medical Assistance Bulletin #01-94-01, Commonwealth of Pennsylvania,  
Department of Public Welfare]

(Additional CBH requirements)

**Psychiatric Rehabilitation Assistant**  
**Psychiatric Rehabilitation Specialist**  
**Psychiatric Rehabilitation Specialist Supervisor**  
**Psychiatric Rehabilitation Worker**

[\[55 PA Code § 5230\]](#)

**Psychiatrist**

- Degree in medicine or osteopathy from an accredited school of medicine or osteopathy in the United States of America.

**OR**

- A valid doctoral degree from a foreign school of medicine
- **PLUS** evidence of successful completion of the ECFMG examination.

**AND**

- A completed psychiatry residency in an Accreditation Council for Graduate Medical Education accredited residency program. CBH requires that the Psychiatrist is Board Certified/Board eligible.
- Current and valid Pennsylvania medical license.

- Valid and current Drug Enforcement Administration (DEA) certification.

(CBH requirement)

**Child Care Supervisor (Residential Treatment Facility)**  
**Child Care Worker (Residential Treatment Facility)**  
**Director (Residential Treatment Facility)**

(Alphabetized here under “Residential Treatment Facility”)

[\[55 PA Code § 3800\]](#)

[\[Provider Bulletin 17-13, The Philadelphia Department of Behavioral Health and Intellectual, disAbility Services \(DBHIDS\), Community Behavioral Health \(CBH\): Changes to Children’s Psychiatric Residential Treatment Facility Staff Requirements, October 25, 2017\]](#)

**Substance Abuse Assessor**

- Bachelor’s or master’s degree from an accredited college with a major in dependency, psychology, social work, nursing, or other related field, and completed ASAM training
- **PLUS** one year of paid experience in a drug and alcohol treatment program as a counselor.

**OR**

- High School Diploma or equivalent and completed ASAM training
- **PLUS** a minimum of two (2) years working in a drug and alcohol treatment program as a counselor.

**Note:** The Substance Abuse Assessor must complete trainings as outlined in Appendix B.

(CBH requirement)

**Substance Abuse Clinical Supervisor**  
**Substance Abuse Counselor**  
**Substance Abuse Counselor Assistant**  
**Substance Abuse Project Director/Facility Director**

[\[Pennsylvania Department Drug and Alcohol Programs Licensing Alert, 1-2019\]](#)

[\[28 PA Code § 704\]](#)

## Substance Abuse Worker

- Meets the requirements of a Mental Health Worker.

**OR**

- High school diploma or General Education Development (GED) equivalent
- **PLUS** experience (paid or unpaid) in a human service field. This may include personal recovery/lived experience.

(CBH requirement)

## Therapeutic Staff Support (BHRS)/Behavioral Health Worker (STS)

[\[Medical Assistance Bulletin 01-01-05, Commonwealth of Pennsylvania, Department of Public Welfare\]](#)

## Therapeutic Staff Support Providing ABA Services

- Has a bachelor's degree in psychology, social work, counseling, sociology, education, criminal justice, or similar human services field.

**OR**

- Bachelor's degree in any other field with at least one year of full time equivalent experience in a job that involved direct contact with children or adolescents.

**AND**

- Completed a 40-hour Registered Behavior Technician (RBT) certification training curriculum within six months of employment. Note, RBT certification is not required.
- Completed the RBT Competency Assessment, under the supervision of a qualified BCBA or Board-Certified Assistant Behavior Analyst (BCaBA) within 12 months of employment.
- The RBT training curriculum can satisfy some of the training outlined in the Office of Mental Health and Substance Abuse Services (OMHSAS) Bulletin 01-01-05; however, the TSS must complete all training as described in OMHSAS Bulletin 01-01-05 and in the MRPPF.

[\[Applied Behavior Analysis Performance Standards 2.0, Community Behavioral Health, February 2019\]](#)

## Therapeutic Staff Support Supervisor

- Is a Licensed Mental Health Professional.

**OR**

- A Mental Health Professional with at least one year of experience either in a Child and Adolescent Service System Program (CASSP), as defined by Medical Assistance, or employed by a licensed mental health agency or subcontracted agency.

[\[Medical Assistance Bulletin #01-01-05, Commonwealth of Pennsylvania, Department of Public Welfare\]](#)

## APPENDIX A: CLEARANCES

- **Pennsylvania Criminal Record Checks** (required of all personnel in all programs)
- **Pennsylvania Child Abuse History Clearance**

**AND**

- **Federal Bureau of Investigations (FBI) Criminal Background Checks<sup>3</sup>**

[See Keep Kids Safe at PA.gov.](#)

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<sup>3</sup> An FBI Criminal Background Check is also required of any person residing in a state other than Pennsylvania, or who has resided in a state other than Pennsylvania within the past two years.

## APPENDIX B: TRAININGS

Trainings are entirely within the purview of the provider. CBH does not conduct the trainings referenced in this document and cannot make recommendations regarding specific trainers.

Unless otherwise stated, trainings may be conducted electronically or online (e.g. CE courses, webinar). It is recommended that the agency maintain post-test results for these trainings.

Mandatory trainings should include a pre- and post-test, the results of which should be maintained in the personnel file. For CPR trainings, a skills-based test throughout the course may be used in lieu of a pre- and post-test. Successful completion of the course must be evidenced by a certificate from the training organization or trainer.

### Mandatory Trainings: General

#### All Direct Care Staff

**Mandatory Trainings must be completed within three months of hire, and bi-annually thereafter.**

- CBH mandatory trainings must cover the following areas: Fire Safety and Prevention, Disaster, Management of Escalation, Infection Control, and Suicide Prevention
- Person First/Cultural Competency
- Restrictive Procedures (child residential and day treatment facilities, inpatient facilities, any other facility or provider using restrictive procedures as an intervention)

#### Ongoing trainings:

- All staff must complete at least ten hours of training annually.
- For programs requiring more than ten hours of ongoing training per year, those program specific regulations must be followed.

#### All Clinical Supervisors

- Supervisors must receive specialized training in the Evidence-Based Practices adopted by the agency in order to guide their implementation.

## All Physicians

The following mandatory trainings must be completed within three months of hire and annually thereafter:

- Fire Safety & Prevention
- Disaster
- Person First

(CBH Requirement)

## Mandatory CPR Certification

In accordance with DPW requirements, 100% CPR Certification must be maintained for:

- Physicians
- Children's residential treatment programs (RTF)
- Partial hospitalization programs

The above personnel must be trained in traditional CPR.

**All other programs (except Children's RTFs and Partial Hospitalization Programs) must ensure that 50% of staff holds current CPR certification.** Up to 40% of the staff of each program may be trained in Citizen CPR (hands-only). At least 10% must be trained in traditional CPR.

(CBH Requirement)

## Mandatory Trainings: Level of Care Specific

### *Behavioral Health Rehabilitative Services*

#### **Behavior Specialist Consultant, Non-ASD Specific**

Training in behavior analysis/modification (minimum of eight hours prior to hire, eight hours annually thereafter) is required.<sup>4</sup>

#### **Behavior Specialist Consultant, Licensed**

Ongoing training in behavior analysis/modification (minimum of eight hours annually after the first year of employment) is required.<sup>4</sup>

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<sup>4</sup> Licensed Psychologists, Social Workers, Clinical Social Workers, Marriage and Family Therapists, and Professional Counselors will not be required to demonstrate ongoing behavior modification training.

## ***Alcohol and Other Drug Recovery Services***

### **Substance Abuse Assessor**

Required Trainings:

- American Society of Addiction Medicine Patient Placement Criteria (ASAM-PPC)
- Consistent with state staffing regulations for counselors, each assessor will complete at least 25 hours of training annually. In the first year following credentialing as an assessor, 18 of those 25 hours are to be done at the rate of six hours of training in each of the following three areas:
  - Cultural awareness/gender issues
  - Developmental psychology
  - Medical physical/HIV issues
- The balance of training hours in year one, along with any subsequent years' training requirements, will be in the following areas and in any additional as identified by the provider.
  - Drug and alcohol assessment
  - The disease of addiction
  - Treatment approaches
  - Pharmacology
  - Confidentiality
  - Interaction of addiction and mental illness

(CBH Requirement)

### **Substance Abuse Services Worker**

Follow the Commonwealth training requirements for Substance Abuse Counselor.

(CBH Requirement)

## **Other Training Resources**

### ***Serving Lesbian, Gay, Bisexual, Transgender, Queer/Questioning, and Intersex People (LGBTQI)***

[Pennsylvania Department of Public Welfare, Office of Mental Health and Substance Abuse Bulletins, OMHSAS-11-01 and 11-02]

## **Documentation of Trainings**

The provider must maintain documentation of all trainings offered and conducted (mandatory and ongoing). This documentation should fully reflect the content and attendance of the trainings. Electronic documentation may be maintained for electronic/online trainings and webinars. Sign-in sheets and any other documents requiring a signature may be scanned. The original must be seen and noted as such.

### ***Documentation of provider training curricula***

**A program specific annual training plan should be in place for all CBH contracted programs.**

- The provider should conduct an assessment of program-specific training needs.
- A written annual training plan based on the results of the assessment and individuals/families served.
- This should include a calendar of scheduled mandatory and ongoing trainings. The training calendar should reflect training times that are practical for all employees.
- Other training opportunities relevant to the agency should also be available.

**Documentation for each training should include:**

- **Training materials (*the full content of the training should be clearly evident*):**
  - Instructor's name, title, and credentials
  - Number of training hours
  - Training transcript
  - Outline/agenda
  - Materials used during the training, such as PowerPoint, video, etc.
  - Written materials, handouts, or any other materials that were distributed
  - *Copies of reading materials alone are not adequate without supporting documentation of how the training was conducted, such as an outline or agenda.*
- **Attendance: a sign-in sheet must be maintained for each training that includes:**
  - Training title
  - Date
  - Beginning and end times

- Number of training hours
- Location
- Instructor's name, title ,and credentials
- Instructor's signature
- Name and signature of the person at the agency responsible for the training.
- Employees' names and signatures

### **Feedback**

The provider should develop a system for obtaining employee feedback to be utilized at the end of each training. This should measure the effectiveness of the training, instructor, materials, and suggestions for other trainings. Feedback can be used to inform future trainings and develop the training plan.

### ***Documentation for each employee***

Individualized documentation for each employee should be maintained. This should be in the employee's personnel file or in a training file that is maintained for each employee.

### **Documentation of completed trainings for each employee should include:**

- An original or verified copy of the training certificate (if available).
- A log of completed mandatory, ongoing, and level of care-specific trainings. The log should include training due date, the employee's name, department, name of training, description of content, name of instructor, employer's signature, employee's signature, date of the training, number of hours, and type of credit earned (CE, etc.).
- Any outside trainings, continuing education, or other professional development should be reflected in the employees file. This should include the training certificate.

(CBH Requirement)

## APPENDIX C: WAIVERS

Under exceptional circumstances, a provider may request a waiver for *experiential* or *educational* Staff Credentialing requirements. A waiver is not an endorsement or approval to hire the prospective employee. If a waiver is granted, the decision to hire the individual is solely that of the provider, and all other credentialing requirements must be met. A request for a waiver does not guarantee approval. Waivers must be requested before the hire of the prospective employee and will *not* be made retroactively. Waivers are granted on an individual basis and may not be generalized to include other employees. State and Federal requirements will be met at all times; waiver requests that are in conflict with County, State, or Federal requirements will not be considered.

In order to ensure that expectations are met and development is monitored, the provider will be required to put forth an enhanced clinical supervision and training program that meets the developmental needs of the new hire as well as the requirements of the program. The CBH Compliance Department will review training and clinical supervision logs for those employees for whom a waiver has been granted. A waiver may be revoked at any time if conditions of the waiver are not met.

Waiver requests should be directed to the CBH Compliance Department at [CBH.ComplianceContact@phila.gov](mailto:CBH.ComplianceContact@phila.gov). Requests will be reviewed and responded to within 60 days of receipt.

**Note:** No more than 20% of a provider's staff may be employed as a result of a waiver.

### **A waiver request should include the following information:**

- 1) The position for which the waiver is requested
- 2) The reason for the waiver request. This should be on the provider's letterhead and explain the extenuating circumstances for the request
- 3) Projected date of hire
- 4) Resume or CV
- 5) Documentation of highest education completed
  - Official transcript and diploma for college/university level
  - Diploma or General Education Development (GED) equivalent for high school level
  - Official documentation of any other relevant education (e.g. continuing education, seminars, or certificate programs)
- 6) Individualized Training Plan
- 7) Enhanced Clinical Supervision Plan

## APPENDIX D: EXCLUDED INDIVIDUALS

It is the responsibility of the provider to screen all employees and contractors to determine if they have been excluded from participation in federal healthcare programs. This should be done at the time of hire or contracting and thereafter on an ongoing monthly basis.

The provider should develop and maintain auditable documentation of screening efforts, including dates the screenings were performed and the source data checked. Periodic self-audits should also be conducted to determine compliance with this requirement.

The following databases should be accessed to determine exclusion status:

The [Medicheck List](#), a list that identifies providers, individuals, and other entities that are precluded from participation in the Medical Assistance (MA) Program.

The [List of Excluded Individuals/Entities \(LEIE\)](#), maintained by the Department of Health and Human Services, Office of Inspector General (DHHS/OIG), is a database of all individuals or entities that have been excluded nationwide from participation in any federal health care program, (e.g. Medicaid and Medicare).

The [System for Award Management \(SAM\)](#) combines federal procurement systems and the Catalog of Federal Domestic Assistance into one system. This consolidation includes the Excluded Parties List System (EPLS).

[\[Medical Assistance Bulletin #99-11-05, Commonwealth of Pennsylvania, Department of Public Welfare\]](#)

**Social Security Death Master File (DMF)**

[\[https://classic.ntis.gov/products/ssa-dmf/#\]](https://classic.ntis.gov/products/ssa-dmf/#)