



*Training Requirements and Policies for Instructor Led Training,
Training Reciprocity, and External Training Approval*

Revised: April 14, 2017

Terminology

Attestation	The act of entering external training information into a learner’s transcript. Attesting to training means you are looking at the document and can present a copy of the document to auditors upon request. If you attest to a training you are required to have a copy of it in the learner’s employee file.
Certification	The electronic container which is updated when a valid training item is completed through MORC via Instructor-Led course, online class, or online test out. Certifications can also be updated through attestation when the training is completed from an approved external vendor or agency.
Certification Due Date	The date current training is good through.
Certification expiration date	We do not use this field; it cannot be removed. Follow the Certification DUE DATE.
CMH	Community Mental Health - there’s one for each county: Macomb, Oakland & Wayne
DSP	Direct Support Professional
Event	An event in CSOD is the highest level of a learning course. Events are attended based on <i>sessions</i> scheduled.
External Training	Trainings accepted by MORC that are taken by a learner at other locations (such as American Red Cross for CPR). The training is “attested to” in Cornerstone; the Provider keeps hard copies in their employee files. MORC maintains electronic copies ONLY for training taken at MORC.
IPOS	Individual Plan of Service
Learner	The staff member taking classes.
Learning manager	The person designated in Cornerstone to manage training for a provider. Learning Managers can register/withdraw learners, run reports, and monitor learner compliance.
Learning Object	The type of training (ILT, video, online, etc)
MORC Approved Providers	Providers who wish to train their staff on specific required topics and have submitted training content, outcomes, flow, content, and trainer credentials for approval to MORC Training. MORC Approved Providers understand they cannot submit or attest to training topics without prior review & approval from MORC Training and doing so constitutes fraud.
ORR	Office of Recipient Rights - there’s one for each county: Macomb, Oakland & Wayne
Provider manager	The person designated in Cornerstone to manage learner accounts and training for a provider. Learning Managers can activate & deactivate accounts, register & withdraw learners from class, run reports, and monitor learner compliance.
Learning Assignment	The process of enrolling a learner in a learning object in place of the learner (formerly called Proxy Enrollment).
Training Reciprocity Group	MORC Training recognizes training conducted outside of MORC that follows the basic standards for training content. These are: Macomb and Oakland CMH, Community Living Services (CLS), and Training and Treatment Innovations (TTI).
Transcript	Holds all training related objects like Certifications, sessions the learner is enrolled in, attestations, completed online or instructor-led courses, course failures, and removed/withdrawn courses.

Training Requirements & Policies for Instructor Led Training, Training Reciprocity, and External Training Approval

Purpose

The MORC Training department is committed to providing the highest quality training to Direct Support Professionals so that they are prepared to deliver exceptional care to those we serve. We are dedicated to partnering with subject matter experts, our provider community, and other shareholders to continually look at improving the training experience.

In keeping with the Michigan Department of Health and Human Services (MDHHS) commitment to promote a system of efficiencies at all levels of service and management, this document is designed to assist the MORC, Inc. contracted services provider in understanding training requirements for Direct Support Professionals when providing care to individuals in a variety of settings.

Training policies, guidelines, and procedures provided in this document are indented to adhere to MORC, Inc. policies, as well as county, state, and federal training requirements for providing medically necessary services and care through the IPOS process.

Training Reciprocity

MORC, Inc. accepts those core elements of direct care training offered by Macomb, Oakland, and Wayne County CMH that are fully and successfully completed by direct support professionals working in these county-based sites and deems those staff to have met the basic requirements for DSP training. Such acceptance is conditioned upon the premises that (a) the training is current (defined as completed within the past twelve months), (b) the completion can be independently verified through Macomb, Oakland, and Wayne County CMH, and (c) MORC may require additional training for those working with MORC supported individuals.

Any CMH training unit with a three-year certification, completed prior to the last twelve months, will require the learner to follow a test-out or refresher procedure to assure competency and maintain training compliance:

Test Out

Unit 1 - Introduction to Human Services and Meeting Special Needs

Unit 4 – Environmental Emergencies

Unit 5 – Basic Health

Units 7 & 8 – Working With People

Refresher Course:

Unit 3 – Nutrition and Food Safety

Unit 6 - Medications

Core providers within each county approved for training: Wayne Community Living Services (CLS), Training and Treatment Innovations (TTI), and, on a limited basis, from Detroit-Wayne’s Virtual Center for Excellence (VCE), which provides online initial and update training for some of the other core competencies required for every direct support professional.

MORC, Inc. recognizes training conducted outside of MORC (like CPR and First Aid) that follows the basic standards for training content.

- A. Use of State-Approved Curriculum for direct support staff which has been approved by the Michigan Department of Human Services/Bureau of Child and Adult Licensing (BCAL)
- B. Alignment with the Training/Curriculum recommendations, requirements, and competencies for the Michigan Association of Community Mental Health Boards (MACMHB) State Training Guidelines Workgroup’s Training/Curriculum Recommendations

Beyond Reciprocity

Providers may be presented with training transcripts or certificates from other entities within Michigan, such as other CMHs. Training from organizations outside of the above mentioned organizations should be submitted to MORC Training for review. A test out will be required to assure competency if training is found to be acceptable. “Toolbox” training is never acceptable as initial training and does NOT qualify or entitle any direct support professional to participate in a test out.

Required Training for All Direct Care Professionals Paid using Medicaid Dollars

	Training Obtained From:	Initial Training: Instructor Led (ILT) only!	Initial Training: Instructor Led Training (ILT) <u>or</u> Online Training	Update Training Frequency	Update Training: Instructor Led Training (ILT) only!	Update Training: Instructor Led Training (ILT) <u>or</u> Online Training
HIPAA, Privacy & Confidentiality	the employer/provider	X				
Recipient Rights Macomb County	CMH Office Of Recipient Rights	X		Every 2 years	X	
Recipient Rights Oakland County	CMH Office Of Recipient Rights	X		Annual		X
Recipient Rights Detroit/Wayne County	CMH Office Of Recipient Rights	X	Blended Training	Annual		X
Bloodborne Pathogens *must meet MIOSHA standards	MORC, MORC Approved Providers, Training Reciprocity Group. Also: Hospitals, Health Organizations, School System, College, University or Medical Training Programs*	X		Annual	X	
Due Process	MORC, CMH Office Of Recipient Rights, MORC Approved Providers, Training Reciprocity Group, VCE		X	3 years		X
Cultural Competency	MORC, CMH Office Of Recipient Rights, MORC Approved Providers, Training Reciprocity Group, VCE (Detroit/Wayne online curriculum)		X	3 years		X

Required Training for All Direct Care Professionals Paid using Medicaid Dollars

	Training Obtained From:	Initial Training: Instructor Led (ILT) only!	Initial Training: Instructor Led Training (ILT) <u>or</u> Online Training	Update Training Frequency	Update Training: Instructor Led Training (ILT) only!	Update Training: Instructor Led Training (ILT) <u>or</u> Online Training
Limited English Proficiency	MORC, CMH Office Of Recipient Rights, MORC Approved Providers, Training Reciprocity Group, VCE (Detroit/Wayne online curriculum)		X	3 years		X
CPR	<u>Cards issued by a certified instructor from a National Certifying Organization:</u> American Heart Association (AHA) American Red Cross National Safety Council American Safety & Health Institute (ASHI)	X		Update Frequency Determined by the National Certifying Organization	X	Online accepted only when accompanied by documentation of the required face-to-face skill demonstration.
First Aid	<u>Cards issued by a certified instructor from a National Certifying Organization:</u> American Heart Association (AHA) American Red Cross National Safety Council American Safety & Health Institute (ASHI)	X		Update Frequency Determined by the National Certifying Organization	X	Online accepted only when accompanied by documentation of the required face-to-face skill demonstration.
Any additional training identified in the I/FPOS	*Please Refer to Current I/FPOS			*Please Refer to Current I/FPOS		

**ADDITIONAL TRAINING REQUIREMENTS FOR:
All Direct Care Professionals
Paid Using Medicaid Dollars
Working in Licensed Homes**

(Vocational, Foster Care, Group Homes, and any setting where an individual's CLS need is 24/7)

	Training Obtained From:	Initial Training: Instructor Led Training (ILT) only!	Initial Training: Instructor Led Training (ILT) <u>or</u> MORC Online Training as it becomes available	Update Frequency:	Update Method: Instructor Led Test Out, Online Test Out <u>Or</u> Instructor Led Training
Intro to Human Services, Meeting Special Needs, Person and Family Centered Planning, Philosophy, and Documentation Skills (Unit 1)	MORC, Training Reciprocity Group	X		3 Years	X
Nutrition & Food Safety (Unit 3)	MORC, MORC Approved Providers, Training Reciprocity Group.		X	3 Years	Online Course used for update
Emergency Preparedness (Unit 4)	MORC, MORC Approved Providers, Training Reciprocity Group.	X		3 Years	X
Health (Unit 5)	MORC, Training Reciprocity Group	X		3 Years	X
Medications (Unit 6)***	MORC, Training Reciprocity Group	X		3 Years	Instructor Led Refresher Training Only
Working With People Introduction and Positive Techniques (Units 7 & 8)	MORC, Center-Certified Providers, Training Reciprocity Group.	X		3 Years	X

***** Vocational Service Providers are responsible for ensuring there is an adequately trained workforce to provide assistance in medication administration if medication is prescribed by a physician to be administered during program hours.**

Vocational service providers can elect to train less than 100% of their direct support professionals. Reducing the number of fully trained staff can never interfere with an individual's service plan, goals, and objectives.

Vocational providers must maintain a current list of those trained to administer medications at each site AND a list of those who receive medications during program hours. This information must be made available in the event of an audit.

External Training Definition

External training is considered any training that occurs outside of MORC, Inc. This may include training received from:

1. Training from other CMH's across the state
 - a. Training must be verifiable by the CMH and meet Initial Training requirements
 - b. Training cannot be "Toolbox" training
2. Training from organizations included in the training reciprocity agreement
 - a. Training from approved organizations in the tri-county area (Macomb, Oakland, Wayne)
3. Training conducted by the provider after approval by MORC
 - a. Bloodborne Pathogens
 - b. Cultural Competency
 - c. Limited English Proficiency
 - d. Due Process
4. Training received from acceptable training organizations
 - a. Recipient Rights
 - b. CPR and First Aid training from one of 16 vendors approved by L.A.R.A.

External Training Documentation

External training documentation is verification of a training that occurred outside of MORC. Training documents that meet the criteria listed above do not need to be submitted to MORC for approval, review, or record retention; however, these documents must be kept on site by the provider and made available to auditors upon request. Training records must be retained for all current and past employees for a period of seven (7) years.

MORC, Inc. accepts external training (Bloodborne Pathogens, Cultural Competency, and Limited English Proficiency) conducted by providers when that provider has submitted training outcomes, flow, materials, methods of training, and trainer qualifications to MORC for review and approval. Once materials have been reviewed and approved as meeting all training requirements, the provider and the certified trainer will be entered into the approved provider training database which can be found in the Cornerstone Knowledge Bank. Training certificates do not need to be physically submitted to MORC, and providers are required to attest to these trainings in Cornerstone for each of their staff; audits are conducted based on compliance information obtained from Cornerstone ***only***. They should be retained by the provider organization as validation of training.

For a comprehensive, up-to-date list of reciprocity partners and their approved courses, please go to the Cornerstone Knowledge Bank. Look in the Cornerstone Manual for Provider & Learning Managers folder, document name is Training Reciprocity Partner List.

Training Documentation and Retaining Training Records

MORC is not the holder of record for external training taken outside of MORC; but we require the information be entered into Cornerstone for each learner. Providers must retain acceptable documentation for external trainings. These records must contain all necessary information and must be made available to auditors upon request.

Training documents, certificates and other forms of training verification need to contain the following information based on the MACMHB Practice Standard (originally dated May 2006) and the Mental Health Association of Training. This includes training documents submitted to MORC for review as well as documents held by the provider as verification of training.

- Staff Member's First and Last Names
- Topic or Subject Name
- Date(s) of Training
- Length of training for both online and instructor led trainings
- An indication of whether the training was a classroom or online format
- An indication of "pass" or "fail" (could contain the word Pass/Successfully Completed/ or indication of performance on a test – 80% or 20/25 correct)
- Name of the organization conducting the training
- Trainers signature and credentials
- A phone number and/or web address of the training organization for further information and transcript verification

Training Attestation

Purpose: The purpose of allowing providers to attest to certain external trainings is to increase efficiencies as well as recognize trainings that are conducted by approved sources outside of MORC. This includes trainings conducted by agencies within the Training Reciprocity Agreement as well as external trainings that have been reviewed and certified by MORC Training as meeting the standards outlined by the State Approved Curriculum for direct support professionals and in alignment with the Training/Curriculum recommendations, including the requirements and competencies for the Michigan Association of Community Mental Health Boards (MACMHB) State Training Guidelines Workgroup.

Definition: Attestation is more than entering data into Cornerstone. It means the provider understands the requirements, which external trainings are acceptable for attestation, what constitutes an acceptable external training as outlined in this document, what must be included on an external training record, and the necessity of retaining and producing these training documents in the event of an audit.

Provider Responsibilities for Training Attestation: The provider's responsibility for external training attestation is as follows:

- A. To thoroughly review and be competent on all information, policies, and standards regarding training reciprocity
- B. Only attest to provider-conducted trainings that are included in the provider training list
- C. Submit any training documentation that falls outside of the training reciprocity agreement to MORC Training for review and eligibility for test-out (i.e., training from CMH approved organizations outside of the tri-county area)
- D. Ensure that all training documentation includes all of the required elements for an acceptable training document
- E. Retain ***all*** training documentation and be able to produce them upon request for auditing purposes
- F. Contact MORC Training when there are any questions or concerns regarding training reciprocity, acceptable documentation, and recordkeeping.
- G. For Providers who are conducting their own training such as Bloodborne Pathogens, Cultural Competency, Limited English Proficiency, Due Process, etc:
 1. Report any changes in approved Trainers
 2. Report any changes in content (additions or eliminations)

Failure to follow the outlined procedures may result in termination of the training attestation policy for the provider.

Attestation

Training records must be retained for all current and past employees for a period of 7 years, including copies of original, face-to-face, direct caregiver training. For a comprehensive, up-to-date list of reciprocity partners and their approved courses, please go to the Cornerstone Knowledge Bank. Look in the Cornerstone Manual for Provider & Learning Managers folder for the document called the *Training Reciprocity Partner List*.

Unit 1 – Introduction to Human Services and Meeting Special Needs

You can accept this training at face value if the training certificate/transcript is **less than 12 months old** and is from:

- MORC
- Training & Treatment Innovations (TTI)
- Wayne CLS
- Macomb County CMH

You can accept this training and allow the learner to test out if the training certificate/transcript is:

- From MORC, TTI, Wayne CLS, or Macomb County CMH and older than 12 months
- From another CMH...**after** the training has been verified by MORC
- From MORC providers: New Horizons and JVS

Test Out Process:

- 1) Attest to the original training in Cornerstone (if the Certification does not reflect previous training)
 - Use the Certification titled: Unit 1 - Introduction to Human Services and Meeting Special Needs
- 2) Keep a copy of the original training certificate/transcript in the employee file for at least 7 years
- 3) Provide the learner with a copy of the Unit 1 Manual, found in the Cornerstone Knowledge Bank
- 4) Sign the learner up for the Test Out you both agree would suit their learning style best
 - Instructor-Led or
 - Online
- 5) The Certification Due Date will update automatically when the learner successfully passes the test out
- 6) If the learner fails the test out, immediately sign them up for the instructor-led course
- 7) Staff who do not pass a test out move to an “**untrained**” status.
- 8) **Untrained** employees may not:
 - Pass medications
 - Work one-on-one with a consumer
 - Work alone or without trained staff present on any shift
 - Transport without trained staff present. Any of these may result in a rights violation.

Unit 3 – Nutrition and Food Service

You can accept this training at face value if the training certificate/transcript is **less than 12 months old** and is from:

- MORC
- Training & Treatment Innovations (TTI)
- Wayne CLS
- Macomb County CMH

You can accept this training and allow the learner to test out if the training certificate/transcript is:

- From MORC, TTI, Wayne CLS, or Macomb County CMH and older than 12 months
- From another CMH...**after** the training has been verified by MORC
- From MORC providers: New Horizons and JVS

Refresher Process:

- 2) Attest to the original training in Cornerstone (if the Certification does not reflect previous training)
 - a. Use the Certification titled: Unit 3 - Nutrition
- 2) Keep a copy of the original training certificate/transcript in the employee file for at least 7 years
- 3) Provide the learner with a copy of the Unit 3 Manual, found in the Cornerstone Knowledge Bank
- 4) Sign the learner up for the online course for Unit 3 - Nutrition
- 5) The certification Due Date will update automatically when the learner successfully passes the class

Unit 4 – Environmental Emergencies

You can accept this training at face value if the training certificate/transcript is **less than 12 months old** and is from:

- MORC
- Training & Treatment Innovations (TTI)
- Wayne CLS
- Macomb County CMH

You can accept this training and allow the learner to test out if the training certificate/transcript is:

- From MORC, TTI, Wayne CLS, or Macomb County CMH and older than 12 months
- From another CMH...**after** the training has been verified by MORC
- From MORC providers: New Horizons and JVS

Test Out Process:

- 3) Attest to the original training in Cornerstone (if the Certification does not reflect previous training)
 - Use the Certification titled: Unit 4 – Environmental Emergencies
- 2) Keep a copy of the original training certificate/transcript in the employee file for at least 7 years
- 3) Provide the learner with a copy of the Unit 4 Manual, found in the Cornerstone Knowledge Bank
- 4) Sign the learner up for the Test Out you both agree would suit their learning style best
 - Instructor-Led or
 - Online
- 5) The certification Due Date will update automatically when the learner successfully passes the test out
- 6) If the learner fails the test out, immediately sign them up for the instructor-led course
- 7) Staff who do not pass a test out move to an “**untrained**” status.
- 8) **Untrained** employees may not:
 - Pass medications
 - Work one-on-one with a consumer
 - Work alone or without trained staff present on any shift
 - Transport without trained staff present. Any of these may result in a rights violation.

Unit 5 – Health

You can accept this training at face value if the training certificate/transcript is **less than 12 months old** and is from:

- MORC
- Training & Treatment Innovations (TTI)
- Wayne CLS
- Macomb County CMH

You can accept this training and allow the learner to test out if the training certificate/transcript is:

- From MORC, TTI, Wayne CLS, or Macomb County CMH and older than 12 months
- From another CMH...**after** the training has been verified by MORC
- From MORC providers: JVS

Test Out Process:

- 4) Attest to the original training in Cornerstone (if the Certification does not reflect previous training)
 - Use the Certification titled: Unit 5 - Health
- 2) Keep a copy of the original training certificate/transcript in the employee file for at least 7 years
- 3) Provide the learner with a copy of the Unit 5 Manual, found in the Cornerstone Knowledge Bank
- 4) Sign the learner up for the Test Out you both agree would suit their learning style best
 - Instructor-Led
 - i. Performance Evaluation done at test out
 - Online
 - i. Performance Evaluation within 3 weeks of passing online test out is required
 1. Sign Learner up for Unit 5 Performance Evaluation at MORC
 2. OR
 3. Someone who has passed MORC's Train the Trainer course can do the eval
 - a. Attest to the evaluation using the certification titled
Unit 5 – Health *ONLINE RECERTIFICATION
- 5) The certification Due Date will update automatically when the learner successfully passes the test out
- 6) If the learner fails any part of the test out, immediately sign them up for the instructor-led course
- 7) Staff who do not pass a test out move to an **“untrained”** status.
- 8) **Untrained** employees may not:
 - Pass medications
 - Work one-on-one with a consumer
 - Work alone or without trained staff present on any shift
 - Transport without trained staff present. Any of these may result in a rights violation.

Unit 6 – Medications

You can accept this training at face value if the training certificate/transcript is **less than 12 months old** and is from:

- MORC
- Training & Treatment Innovations (TTI)
- Wayne CLS
- Macomb County CMH

You can accept this training and allow the learner to test out if the training certificate/transcript is:

- From MORC, TTI, Wayne CLS, or Macomb County CMH and older than 12 months
- From another CMH...**after** the training has been verified by MORC

Refresher Process:

- 5) Attest to the original training in Cornerstone (if the Certification does not reflect previous training)
 - Use the Certification titled: Unit 6 - Medications
- 6) Keep a copy of the original training certificate/transcript in the employee file for at least 7 years
- 7) Provide the learner with a copy of the Unit 6 Manual, found in the Cornerstone Knowledge Bank
- 8) Sign the learner up for the online Medication Refresher course (Part 1) on Transcription
- 9) Once complete, sign the learner up for the Instructor-Led Medication Refresher (Part 2) class
- 10) The certification Due Date will update automatically when the learner successfully passes the Refresher
- 11) If the learner fails any part of the Refresher, immediately sign them up for the instructor-led course
- 12) Staff who do not pass a test out move to an **“untrained”** status.
- 13) **Untrained** employees may not:
 - Pass medications
 - Work one-on-one with a consumer
 - Work alone or without trained staff present on any shift
 - Transport without trained staff present. Any of these may result in a rights violation.

****VOCATIONAL Providers - Process:**

Vocational Service Providers are responsible for ensuring there is an adequately trained workforce to provide assistance in medication administration if medication is prescribed by a physician to be administered during program hours.

Vocational service providers can elect to train less than 100% of their direct support professionals. Reducing the number of fully trained staff can never interfere with an individual’s service plan, goals, and objectives.

Vocational providers must maintain a current list of those trained to administer medications at each site AND a list of those who receive medications during program hours. This information must be made available in the event of an audit.

Units 7 & 8 – Working With People

You can accept this training at face value if the training certificate/transcript is **less than 12 months old** and is from:

- MORC
- Training & Treatment Innovations (TTI)
- Wayne CLS
- Macomb County CMH

You can accept this training and allow the learner to test out if the training certificate/transcript is:

- From MORC, TTI, Wayne CLS, or Macomb County CMH and older than 12 months
- From another CMH...**after** the training has been verified by MORC
- From MORC providers: JVS

Test Out Process:

- 1) Attest to the original training in Cornerstone (if the Certification does not reflect previous training
 - Use the Certification titled: Units 7 & 8 – Working With People
- 2) Keep a copy of the original training certificate/transcript in the employee file for at least 7 years
- 3) Provide the learner with a copy of the Unit 7 and Unit 8 Manual, found in the Cornerstone Knowledge Bank
- 4) Sign the learner up for the Test Out you both agree would suit their learning style best
 - Instructor-Led or
 - Online
- 5) The certification Due Date will update automatically when the learner successfully passes the test out
- 6) If the learner fails the test out, immediately sign them up for the instructor-led course
- 7) Staff who do not pass a test out move to an “**untrained**” status.
- 8) **Untrained** employees may not:
 - Pass medications
 - Work one-on-one with a consumer
 - Work alone or without trained staff present on any shift
 - Transport without trained staff present. Any of these may result in a rights violation.



MORC Training Locations

Auburn Hills:

1270 Doris Road

Auburn Hills, MI 48326

248-276-8031

Clinton Township: Lincoln Center

15930 19 Mile Road

Building 200, Suite 120

Clinton Township, MI 48038

586-464-0400