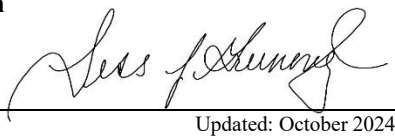
COMMUNITY MENTAL HEALTH AUTHORITY

ADMINISTRATIVE POLICY AND PROCEDURES MANUAL				
Chapter **Program Quality**	**Section** **Provider Network Management**	**Chapter** **05**	**Section** **05**	**Subject** **10**
Subject **Qualifications and Supervision of Non-Credentialed Staff**	**Authorization** 		**Approved: 12/26/17** **Replaces: #06-02-41 (Clinical Supervision) approved 10/30/12**	

Updated: October 2024; Reviewed/No Updates: October 2025

I. PURPOSE: To ensure that all non-credentialed individuals providing direct services including staff members, volunteers, trainees, interns, and contract providers meet minimum requirements as a qualified provider and are provided with appropriate supervision or direction in the care and treatment of consumers.

II. APPLICATION: All non-credentialed providers of clinical and community services programs employed directly, contracted, or subcontracted by Gogebic Community Mental Health Authority (GCMHA).

III. DEFINITIONS: Non-credentialed staff: Non-professional/paraprofessional personnel who do not require a degree or license to provide specific services and supports.

IV. POLICY: GCMHA requires that all non-credentialed personnel meet criteria as set in the Michigan Medicaid Provider Manual, which states all providers must be:

- At least 18 years of age.
- Able to prevent transmission of any communicable disease from self to others in the environment in which they are providing supports.
- Able to communicate expressively and receptively in order to follow individual plan requirements and beneficiary-specific emergency procedures, and report on activities performed.
- In good standing with the law according to the PIHP/DHHS and CMHSP/DHHS contracts.
- Successful in completing required recipient rights training.
- Able to perform basic first aid procedures.

V. PROCEDURE:

A. GCMHA will ensure non-credentialed staff meet minimum requirements including, but not limited to those outlined in the Medical Provider Manual, the PIHP/DHHS and CMHSP/DHHS Specialty Services and Supports Contracts, NorthCare and GCMHA training requirements, and specific training regarding Individual Plans of Service (IPOS), as required.

B. GCMHA will ensure that all non-credentialed staff providing direct service to individuals are appropriately supervised and have available evidence of this supervision upon request by NorthCare and/or DHHS. Training requirements are

found in GCMHA's *Required Training & Assessment of Training Needs of Personnel* policy #00-00-06A.

1) All direct care providers of service are supervised by an immediate supervisor, program director, psychiatrist and/or Medical Director.

2) Supervision can occur through supervisory participation in treatment planning, organizational staff meetings, individual supervision and/or review of the clinical record.

3) Supervision is provided by qualified staff as determined by state licensure or certification, expertise in a particular area such as a Qualified Mental Health Professional (QMHP), a Qualified Intellectual/Developmental Professional (QIDP), and/or a Children's Mental Health Professional (CMHP).

4) Clinical supervision includes review of:

- **a)** The accuracy of assessment and referral skills.
- **b)** The appropriateness of the treatment or service intervention relative to the needs of each person served, to include medical necessity and community integration focusing on recovery of the individual.
- **c)** Treatment effectiveness as reflected in the person meeting his designated goals, dreams and desires.
- **d)** Provision of feedback that enhances the skills of the provider.
- **e)** Ethical issues, legal aspects of clinical practice and professional standards including boundaries.
- **f)** Clinical documentation issues identified through on-going record reviews.
- **g)** Cultural competency issues.
- **h)** Identification of training needs.

5) Supervision is documented via various staffing meeting minutes in the case of group supervision and in individual consultations via an individual consultation note. In home-based this is completed on home-based staffing minutes. In the case of all other programs documentation will occur on an individual consultation note. All staffing minutes and or consultations are maintained by the supervisor of the program.

VI. REFERENCES AND LEGAL AUTHORITY: CARF Behavioral Health Standards; Michigan Medicaid Provider Manual; MDHHS/PIHP Specialty Services and Supports Contract; MDHHS Site Review Interpretive Guidelines E.1; URAC Accreditation Standards; NorthCare Network Background Check Policy; NorthCare Network Training Policy NorthCare Standard Operating Procedure -Staff Training specific to Consumer IPOS_v.021016 [F]

VII. EXHIBITS: None