



## SHIAWASSEE HEALTH AND WELLNESS PROCEDURE MANUAL

<b>Title:</b>	Monitoring Compliance with Recipient Rights Training
<b>Section:</b>	Recipient Rights
<b>Policy Number:</b>	24b
<b>Issued By:</b>	Director of Recipient Rights
<b>Approved by:</b> <b>Approved on:</b>	<b>Effective Date: 1/24/2020</b>

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### RELATED POLICY: 24- Site Assessments

#### PROCEDURE: Steps taken to ensure all staff are trained within 30 days of hire

Mental Health Code Section 330.1755 (5) (f) states that each ORR established under this section shall ensure that all individuals employed by the CMHSP or its contract agencies receive training related to recipient rights protection before or within 30 days after being employed.

The Shiawassee Health and Wellness Office of Recipient Rights (ORR), Contracts Manager, Financial Services Supervisor, and Training Department strive to achieve this by having instituted the following procedure.

1. The SHW Contracts Manager will ensure that every contract with an outside agency/provider will include language requiring the provider to ensure that all staff employed will receive recipient rights related training before or within 30 days after being employed, using an SHW approved curriculum.
  - a. A list of all contract agencies/providers will be given to the ORR in November of every year with revisions to the list provided as they occur- (see Procedure 24a).
2. Shiawassee Health and Wellness offers initial training in Recipient Rights the second Thursday of every month. All contract providers/agencies providing services within Shiawassee County will contact the SHW Training Coordinator to enroll staff and ensure that all staff are trained in the SHW initial recipient rights training course before or within the 30 days of hire.
  - a. The initial recipient rights training sign in sheets includes staff name, employer, and date of hire.
  - b. In circumstances when the employee date of hire and the next scheduled initial recipient rights training falls outside the 30- day window, the provider will contact the ORR at 989-723-0725 or email [AAndrykovich@shiabewell.org](mailto:AAndrykovich@shiabewell.org) to schedule an alternate staff training date. When informed, the SHW ORR will make every attempt to assist providers with ensuring that employees are training within 30 days of employment.

3. All contract providers/ agencies located and providing services outside of Shiawassee County are to provide the employee date of hire and date trained in recipient rights to the SHW Training Coordinator as it occurs. The SHW Training Coordinator will alert the ORR and the SHW Financial Services Supervisor of instances when an employee is not trained before or within 30 days of being employed.
4. The RRA will monitor on an on-going basis to ensure that employees receive rights related training before or within 30 days of hire and record this information in the staff training database maintained on the Recipient Rights G-Drive via the following:
  - a. At the time of the annual ORR Site Visit, the SHW Human Resources Log will be sent to provider management staff. This Log is to be completed by the provider and returned to the ORR prior to or at the time of the annual site visit. The Recipient Rights Advisor (RRA) will log this information prior to sending the letter of compliance. This letter of compliance also reminds the provider to contact the ORR with staffing changes as they occur. (see Procedure 24a)
  - b. Upon completion of the SHW Initial Recipient Rights Training, the RRA will review the sign in sheet to ensure that employees are added to the ORR staffing database as well as the date of hire.
  - c. The RRD will run a report through Corzizio and Relias (programs used by the SHW Training Department to enroll staff in training) by the 2<sup>nd</sup> week of every month and provide the RRA with these reports to ensure that staffing information is captured and logged on the staffing database.
  - d. Beginning in February 2020, all providers are required to submit the SHW ORR Training Tracker form to the ORR by the first Friday of every month. This information will be compared to the information in the ORR staff database and the RRA will make changes accordingly.
5. If it has been determined that an employee did not receive recipient rights training before or within 30 days of hire, the SHW Financial Services Supervisor and Contracts Manager will be notified by email
  - This can occur when reviewing the SHW Human Resources Log, the ORR Training Tracker form, Monthly reports compiled from Corzizio and/or Relias, or the Monthly ORR Recipient Rights Training Sign In Sheet.
    - a. All providers will be charged an \$80.00 no show fee for every employee that fails to attend a scheduled SHW recipient rights training. Upon completion of the class, the RRA will email the name of staff listed on the sign in sheet, who did not attend, as well as the provider agency to the Financial Services Supervisor and the Contract Manager so that the provider will be charged the \$80.00 fee.
    - b. In addition to the no-show fee, and in situations involving providers outside of Shiawassee County, the RRA will email the Financial Services Supervisor and Contracts Manager upon discovering (via the Human Resources Log and/or Training Tracker) that an employee failed to attend recipient rights training within the 30 day window for date of hire. When these situations occur, any

financial claim submitted by that employee, outside of the 30-day window, will not be paid to the provider. If a claim has already been paid prior to the time of discovery, steps will be taken to pull back the funds paid until documentation can be submitted indicating that the employee has been trained.

- c. Additional contract sanctions will occur in situations involving repeated violations. The SHW Contracts Manager will be included on all non-compliance notifications involving staff training so that appropriate sanctioning can be determined.

**Change Log:**

<b>Date of Change</b>	<b>Description of Change</b>	<b>Responsible Party</b>
1/24/2020`	Procedure development	Andrea Andrykovich, RRD