

SANILAC COUNTY COMMUNITY MENTAL HEALTH AUTHORITY

ADMINISTRATIVE POLICY

NUMBER: BA161

NAME: NEW HIRES AND EMPLOYEE JOB REQUIREMENTS

INITIAL APPROVAL DATE:	12/02/2020	BY: Administrative Committee
(LAST) REVISION DATE:	04/16/2025	BY: HR Manager
(LAST) REVIEW DATE:	04/17/2025	BY: Policy Committee
DISCONTINUED DATE:	N/A	REPLACE BY: N/A

I. PURPOSE

To outline pre-hire requirements and on-going employment checks, as well as outline expectations of staff regarding proof of meeting job requirement qualifications.

II. APPLICATION

Populations: **NA**
Programs: **Direct - ALL**
Contracted - ALL

III. STANDARDS

A. Position Requirements and References

When staff are hired for a temporary, full- or part-time position, they must meet the requirements for the position and have three (3) references from people other than family members. A past Supervisor will be the preferred reference whenever possible.

B. Criminal Background Checks

They must also have a criminal background check completed prior to hire and annually thereafter. Items found on the background check will be discussed with the employee/potential employee. Any findings for a current employee may subject the employee to termination depending upon the severity of the incident, charges presented and length of time from the last relevant charge. (Example: A conviction of embezzlement when applying for a financial position may be cause for extra consideration before hiring the same individual.) Employees that disagree with the charges may contact the reporting agency. Current employees are expected to report conduct that results in criminal charges immediately. The CEO has the final decision as to when enough time has passed between incidents and whether the Agency is interested in still employing the individual, in conjunction with the Medicaid Manuals Provider Background Enrollment Fitness Criteria (as outlined in section D below).

C. Degree and Licensure

Clinical staff must present evidence of their degree and professional licensure as required by the position on or before their first day of work. A grace period may be granted to submit licensure, during this timeline the staff may not bill or work outside of their current validated credentials. Staff must adhere to the timelines/offer letter to submit credentialing or termination may be recommended. Master level clinical staff are required to apply for a MCBAP Development Plan within 60 days of hire, Bachelor level clinical staff are highly encouraged to obtain a MCBAP plan.

D. Primary Source Verification

Primary Source Verification occurs upon hire/interview and annually thereafter. If at any point during the employment process an issue regarding licensure is found, it will be required to be resolved prior to continuing to provide services or starting employment. Licensing issues should be reported by the staff immediately, in writing, to HR.

E. Provider Background Enrollment Fitness Criteria

The following criteria must be met in order to qualify for enrollment in Michigan's Medicaid Program. An applicant/employee must be able to be successfully enrolled into the required provider systems, as required for their position. Failure to be successfully enrolled may result in termination.

MDHHS must terminate or deny a provider's enrollment in Michigan's Medicaid program for the following reasons:

The provider has been convicted of a relevant crime and received a conviction of a relevant crime described under 42 USC 1320a-7(a):

Program related crimes, patient abuse, health care fraud, or a felony related to controlled substances.

The provider has a federal or state felony conviction within the preceding 10 years of their provider enrollment application, including but not limited to any criminal offense related to:

Murder, rape, abuse neglect, assault, or other similar crimes against persons.

Extortion, embezzlement, income tax evasion, insurance fraud, and other similar financial crimes, theft;

The use of firearms or dangerous weapons; or

Any felony that placed the Medicaid programs or its beneficiaries at immediate risk, such as malpractice suits that results in a conviction of criminal neglect or misconduct.

The provider has a federal or state misdemeanor conviction within the preceding five years of their provider enrollment application, including but not limited to any criminal offense related to:

Any misdemeanor crime listed as a permissive exclusion in 42 USC 1320a-7(b);

Rape, abuse, or neglect, assault, or other similar crimes against persons.

Extortion, embezzlement, income tax evasion, insurance fraud, or other similar financial crimes, theft; or any misdemeanor that placed the Medicaid program or its beneficiaries at immediate risk, such as malpractice suite that results in a confiscation of criminal neglect or misconduct.

For criminal offenses that fall under mandatory exclusions if 42 USC 1320a-7(a), the definition of conviction will conform with 42 USC 1320a-7(i), which may include, but is not limited to, a record relating to criminal conduct that has been expunged.

F. Agency Credentialing

Staff are required to provide proof of credentialing as requested by HR. When a professional license expires, staff are expected to give copies of their new license to the HR Department immediately. The HR department will request copies within 30 days of expiration. Updates on timelines of obtaining the license are required when these notices are received. Temporary verification of active licensure may be obtained through LARA to continue services until the physical license is received.

G. MDDHS/Sex Offender Check

If a person will be working with children, they are required to obtain a MDDHS/Sex Offender check and a background check annually.

H. Required Training and System Set Up

Upon hire, a New Hire Orientation Schedule will be created by Human Resources and distributed to the new staff and those included in the training schedule. This acts as a guide for the new staff to help

navigate the first two (2) weeks and outlines the required trainings. Supervisors are responsible for ensuring that the schedule is followed, and that all training is completed. They will need to coordinate with the appropriate parties if rescheduling is required. Supervisors Orientation forms must be submitted to Human Resources no later than 30 days of hire. Supervisors will need to complete the New Hire Staff IT Form prior to the entrance of the new staff, completion should occur when a vacancy is posted, but is required to be completed within a minimum of three days prior to the new staff's start date.

IV. ATTACHMENTS

V. REFERENCES:

- New Staff IT Form (On Agency webpage-under HR/Staff Resources).
- Michigan Department of Health and Human Services (MDHHS) Medicaid Provider Manual.