

Status **Pending** PolicyStat ID **18257360**



Origination	N/A	Owner	Chamika Phillips: Sr. Director of Org. Culture and Climate
Last Approved	N/A	Policy Area	Human Resources
Effective	Upon Approval	Applicability	DWIHN System Wide
Last Revised	N/A		
Next Review	1 year after approval		

## Anti-Human Trafficking Policy

### POLICY

Detroit Wayne Integrated Health Network (DWIHN) is committed to the prevention, identification, and reporting of human trafficking. DWIHN will ensure that its staff, contractors, and affiliates are trained to recognize and respond to signs of human trafficking, protect victims, and comply with federal, state, and local regulations. DWIHN is committed to zero tolerance of human trafficking. All workforce members and contracted providers are mandated to act in accordance with MDHHS “SRM-300: Human Trafficking of Children Protocol,” ensuring swift, trauma-informed responses and full confidentiality.

### PURPOSE

The purpose of the Anti-Human Trafficking Policy at Detroit Wayne Integrated Health Network (DWIHN) is to establish clear guidelines for the prevention, identification, and reporting of suspected human trafficking within our network. This policy aims to protect the safety and well-being of consumers, staff, and the greater community by ensuring that all DWIHN personnel are equipped to recognize signs of trafficking, respond appropriately, and comply with all relevant federal, state, and local laws. DWIHN is committed to fostering a trauma-informed, victim-centered approach that supports survivors and coordinates effectively with law enforcement and community partners to combat human trafficking. To ensure DWIHN staff and network providers recognize, report, and respond to human and child trafficking, in compliance with Michigan law (MCL 333.16148, R 338.604), MDHHS protocols, and DWIHN contractual obligations.

### APPLICATION

1. The following groups are required to implement and adhere to this policy:

- a. DWIHN Board
  - b. DWIHN Staff including the following
    1. DWIHN PIHP Staff
    2. DWIHN Community Care Clinic Staff (Direct Care Staff)
    3. DWIHN Community Care Clinic Staff (DWIHN staff operating as a CCBHC)
    4. DWIHN Crisis Care Center Staff
    5. DWIHN Mobile Crisis Staff
  - c. Contractual Staff
  - d. Clinically Responsible Service Provider (CRSP) and their subcontractors
  - e. Specialty Providers
  - f. Crisis Services Vendors
  - g. Credentialing Verification Organization (CVO)
  - h. Designated Collaborating Organizations (DCO)
2. This policy serves the following populations:
- a. Adults
  - b. Children
  - c. Individuals with Intellectual and/or Developmental Disabilities (I/DD)
  - d. Serious Mental Illness (SMI)
  - e. Serious Emotional Disturbance (SED)
  - f. Substance Use Disorder (SUD)
  - g. Autism
  - h. Mild/Moderate levels of care
3. This policy impacts the following contracts/service lines:
- a. Autism
  - b. Certified Behavioral Health Clinics
  - c. General Fund
  - d. Grants
  - e. MI-HEALTH LINK
  - f. Medicaid
  - g. SUD

## KEYWORDS

1. Human Trafficking: "Human Trafficking" means the use of force, fraud, or coercion to obtain some type of labor, including unlawful child labor, or commercial sex acts.

2. Child Trafficking: Any trafficking involving a person under 18.
3. Workforce: For the purpose of this policy, "Workforce" or "Network Workforce" includes all employees, officers, and other agents, such as contract or temporary workers, volunteers, interns.
4. **Victim:** Any individual who may be subject to exploitation due to human trafficking.
5. **Supplier:** "Supplier" means third-party entity contracted with the DWIHN to perform services on our behalf.
6. SRM-300 Protocol: MDHHS-required child trafficking investigation procedures.

## STANDARDS

### Roles & Responsibilities

1. Workforce Members & Providers:
  - a. Complete MDHHS-approved trafficking training within 30 days of hire and biennially.
  - b. Identify trafficking indicators using MDHHS "red flags" toolkit.
  - c. Report suspected cases immediately.
2. Supervisors & Leadership:
  - a. Ensure training completion and documentation.
  - b. Facilitate investigations and interagency collaboration.
3. Compliance & QA Teams:
  - a. Monitor adherence through audits and Quality Assurance Performance Improvement Project (QAPIP) reviews.

### Identification & Reporting Protocols

1. Children (< 18):- Follow SRM-300 protocol, ensure confidentiality.
2. Adults (≥ 18):- Report through APS and coordinate services as needed.

### Training & Education

1. Initial: Detroit Wayne Connect "Human Sex Trafficking" module within 30 days.
2. Renewal: Every 2 years.
3. Toolkits: MDHHS red flags, SRM-300, Human Trafficking Advisory Board (HTAB).
4. Documentation: Certificates in personnel files.

### Compliance Monitoring & Documentation

1. Annual audits, Human Resources (HR) tracking, incident logs, corrective action documentation.

# Sanctions for Non-Compliance

## Violation | Sanction

Training delay or lack	Written notice, 30 days to comply
Reporting omissions	Corrective action, service suspension
Staff misconduct	Discipline up to termination
Provider non-compliance	Contract termination
Licensure violations	Report to LARA

## Confidentiality & Victim Safety

1. Limit disclosures to necessary personnel.
2. Use trauma-informed engagement practices.
3. Secure storage per DWIHN and MDHHS standards.

## QUALITY ASSURANCE/IMPROVEMENT

DWIHN shall review and monitor contractor adherence to this policy as one element in its network management program, risk management program, and Quality Assessment/Performance Improvement Program (QAPIP) Work-plan.

The quality improvement programs of Network Providers must include measures for both the monitoring of and the continuous improvement of the programs or processes described in this policy.

## COMPLIANCE WITH ALL APPLICABLE LAWS

DWIHN staff, Contracted Network Providers, and their subcontractors are bound by all applicable local, state and federal laws, rules, regulations and policies, all federal waiver requirements, state and county contractual requirements, policies, and administrative directives, as amended.

## LEGAL AUTHORITY

1. Michigan Public Health Code: MCL 333.16148; R338.604

## RELATED POLICIES AND PROCEDURES

1. MDHHS SRM-300 Protocol
2. MDHHS HTAB toolkit
3. DHS foreign-consul notification procedures
4. DWIHN policy guidelines (PolicyStat)

# CLINICAL POLICY

NO

# INTERNAL/EXTERNAL POLICY

EXTERNAL

## Approval Signatures

Step Description	Approver	Date
Operational Review	Monifa Gray: Associate Vice President Legal Services	Pending
Operational Review	Darrin Crawford: Chief Of Staff	Pending
Operational Review	Michele Vasconcellos: Director of Customer Service [AS]	10/2025
Operational Review	Shama Faheem: Chief Medical Officer	09/2025
Operational Review	Stacie Durant: Vice President Of Finance	09/2025
Operational Review	Sheree Jackson: Vice President Of Compliance	08/2025
Operational Review	April Siebert: Director of Quality Improvement	08/2025
Operational Review	Melissa Moody: Vice President Of Clinical Operations	08/2025
NCQA Committee	Margaret Keyes-Howard: Strategic Planning Administrator	08/2025
NCQA Committee	Tania Greason: Quality Administrator	08/2025
NCQA Committee	Justin Zeller: Project Manager	08/2025
NCQA Committee	Allison Smith: Director of Strategic Operations	08/2025
Unit Review and Approval	Jody Connally: Vice President Of Human Resources	08/2025

## Applicability

Community Care Clinic, Crisis Care Center, Detroit Wayne Integrated Health Network

## Standards

No standards are associated with this document

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