

HEADS UP...

TOPIC: Verifying and Documenting Staff Qualifications

SETTING: Home Care (OME) Program

The quality of a home care organization's staff and licensed independent practitioners plays a large part in the quality of the care, treatment, and services it provides. As such, the home care organization needs to establish requirements for the verification of staff education, training, and experience (qualifications) as well as required licensure, certification(s), or registration(s) to ensure staff meet an established level of proficiency. When licensure, certification, or registration is required by law and regulation to perform the duties of their role, it is important to verify these documents with the primary source at time of hire and renewal to avoid the acceptance of fraudulent credentials. The primary source is usually the State Department of Health, and/or the school, college, or university attended by the staff member, though it could also be an agency or external organization. Adhering to these requirements supports provision of the highest level of care to patients and residents.

Why is this important?

Scope of the Problem:

Time period: **October 1, 2021 through September 30, 2022**

Number of full surveys performed: **2,176**

Number of surveys with findings: **244 (11%)**

Relevant standard/EP: HR.01.01.01 The organization defines and verifies staff qualifications.

EP 2 The organization verifies and documents the following:

- Credentials of care providers using the primary source when licensure, certification, or registration is required by law and regulation to practice their profession. This is done at the time of hire and at the time credentials are renewed.
- Credentials of care providers (primary source not required) when licensure, certification, or registration **is not** required by law and regulation. This is done at the time of hire and at the time credentials are renewed.

Sample survey observations [from surveyor notes] and contributing factors

Sample observations

- In 6 of 6 HR files reviewed, for licensed professionals, primary source verification of their licenses was done around the time of hire instead of prior to hire, and not done subsequently at time of renewal as required by policy and regulation.
- In 2 of 3 HR files reviewed, there was no documentation to validate that licensure status had been validated.
- In 3 of 5 HR files reviewed, During HR#2, HR#3 and HR#5 file review it was noted the professional licenses were not source verified until 2 weeks after the expiration date.

Potential contributing factors

- Lack of Human Resource oversight or unclear roles and responsibilities pertaining to qualification verification.
- No tracking mechanism for when licenses were set to expire and when primary source verification was needed.
- Lack of or unclear documentation procedures.
- Lack of training and education regarding licensure verification and documentation.

How to identify potential problems in your organization

Review your policies and procedures

- Does the organization have a clear policy and procedure for verifying and documenting the credentials of care providers?
 - Do the policies and procedures clearly identify how to verify using the primary source when licensure, certification, or registration is required by law and regulation?
 - Do the policies and procedures identify which types of credentials need to be verified using primary source verification?
 - Do the policies and procedures clearly state when credentials need to be verified (e.g., at the time of hire and when credentials have been renewed)?
- Does the policy and procedure address staff responsibilities (e.g., who is responsible for verifying and documenting the credentials?)
- Does the policy address how leadership will oversee the verification process?
- Does the organization review federal and state regulations and are the organization's policies consistent with these regulations?

Interview staff

- Can relevant staff demonstrate knowledge of requirements for verifying and documenting credentials?
- Can clinical staff verbalize how they would verify or find credentialing information for any care provider presenting to the organization (especially when administrators are not present)?

Assess your environment

- Does the organization have a checklist of information and documents needed to verify the credentials of care providers?
- Does the organization have a system for tracking staff qualifications?

Evaluate implementation

- Review care providers records to verify evidence of training and appropriate qualifications.

What are some resources can assist me in mitigating risks in these areas?

Joint Commission Resources website, Home Care Products (Advisory Services, eProducts, Learning Events, Publications): [JCR - Home Care](#)
Joint Commission website, Standard FAQs, Human Resources for Home Care (numerous HR topics): [Home Care FAQs](#)