



## BUREAU OF PRIMARY HEALTH CARE

# Health Center Program Site Visit Protocol: Credentialing and Privileging File Review Resource

*Last updated: August 20, 2018*

**Note:** This resource is intended to complement the Site Visit Protocol, which is the primary tool for assessing compliance with Health Center Program requirements during operational site visits.

# CREDENTIALING AND PRIVILEGING FILE REVIEW

## RESOURCE

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**PURPOSE:** The checklist provides common *examples* of credentialing and privileging documentation methods and sources. The examples are not exhaustive. Refer to the [Health Center Program Compliance Manual](#) for Health Center Program policy guidance and the [Site Visit Protocol](#) for complete guidance on the conduct of Operational Site Visits.

**Note the following when using the checklist:**

- Examples of Licensed Independent Practitioners (LIPs) include: Physician, Dentist, Physician Assistant, Nurse Practitioner.
- Examples of Other Licensed or Certified Practitioners<sup>1</sup> (OLCPs) include: Registered Nurse, Licensed Practical Nurse, Certified Medical Assistant, Registered Dietitian, Pharmacist.
- Examples of other clinical staff include: Medical Assistants or Community Health Workers in states, territories or jurisdictions that do not require licensure or certification.
- Recurring credentialing and renewal of privileges occur in a timeframe determined by the health center (e.g., every two years).
- The health center determines what specific aspects of the credentialing process (such as verification of current licensure, registration, or certification) would apply to “other clinical staff.”
- If a health center does not have “other clinical staff,” the health center does not have to include such staff in its operating procedures, and thus would not have this type of provider file to review.

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<sup>1</sup> Categorization of providers as LIPs or OLCPs may vary from state to state based on the specific licensure and certification requirements and scope of practice prescribed by that state.

<u>Credentialing Activity</u>	Examples of documentation for Licensed Independent Practitioner (LIP)	Examples of documentation for Other Licensed or Certified Practitioner (OLCP) and Other Clinical Staff
<b>1. Verification of identity (for initial credentialing)</b>	Completed using government issued picture identification.	Completed using government issued picture identification.
<b>2. Verification of current licensure, registration, or certification</b>	<p>Primary source verification directly from the state licensing agency/body.</p> <p>Primary source verification for LIPs could include direct correspondence and telephone, fax, e-mail, or paper reports received from original sources (e.g., telephone confirmation from an educational institution that the individual graduated with the degree[s] listed on his or her application, confirmation through a state’s database that a provider’s license is current, reports from credentials verification organizations).</p>	<p>Primary source verification directly from the state licensing agency/body or certification agency/body, as applicable.</p> <p>N/A for other clinical staff in states, territories or jurisdictions that do not require licensure or certification for such staff.</p>

Credentiaing Activity	Examples of documentation for Licensed Independent Practitioner (LIP)	Examples of documentation for Other Licensed or Certified Practitioner (OLCP) and Other Clinical Staff
<p><b>3. Verification of education and training (for initial credentialing)</b></p>	<p>Primary Source verification required. Verification of graduation from medical, dental, or other clinical professional school and, if applicable, residency, including receipt of sealed transcripts.</p> <p>Possible sources of verifying education and residency for Physicians: AMA Physician Master Profile, AOA Physician Master File, ECFMG: Educational Commission for Foreign Medical Graduates <i>for international graduates licensed after 1986</i>.</p> <p>Possible sources of verifying certifications for other LIPs: ANCC (<a href="#">American Nurses Credentialing Center</a>), AMCB (<a href="#">American Midwifery Certifying Board</a>), NCCPA (<a href="#">National Commission on Certification of Physician Assistants</a>).</p> <p><b>Note:</b> <i>The health center may rely on the state licensing agency, specialty board or registry to verify education and training if the health center can document that these entities conduct education and training primary source verification. When using such a source, the health center should verify at least annually the state licensing agency continues to primary source verify.</i></p>	<p>For OLCPs and any other clinical staff, the health center determines the process for verification of education and training (e.g., primary vs. secondary source verification as well as the sources of verification).</p>
<p><b>4. National Practitioner Data Bank (NPDB) Query</b></p>	<p>Copy of completed report from <a href="#">National Practitioner Data Bank (NPDB) query</a> or documentation that the health center is signed up for <a href="#">continuous query from the NPDB</a> (i.e., health center signs all their providers up and NPDB sends them a real-time report if anything changes in any provider’s file.).</p>	<p>Same as LIPs.</p> <p><b>Note:</b> <i>The NPDB does not include information on all provider types, including some OLCPs. Therefore, this may be “N/A” for certain providers.</i></p>

<u>Credentialing Activity</u>	Examples of documentation for Licensed Independent Practitioner (LIP)	Examples of documentation for Other Licensed or Certified Practitioner (OLCP) and Other Clinical Staff
<b>5. Verification of Drug Enforcement Administration (DEA) registration (if applicable)</b>	If applicable, copy of the physician/provider's current DEA registration certificate, which indicates the issue and expiration dates.	Same as LIPs. Only applicable for any OLCPs authorized to dispense controlled substances by the state in which they practice.
<b>6. Verification of basic life support training</b>	Documentation of completion of basic life support training (e.g., a copy of certificate of completion of training, course completion dates, etc.) or documentation of training included as part of provider licensure or certification.	Documentation of completion of basic life support training (e.g., a copy of certificate of completion of training, course completion dates, etc.).

Privileging Activity	Examples of documentation for Licensed Independent Practitioner (LIP)	Examples of documentation for Other Licensed or Certified Practitioner (OLCP) and Other Clinical Staff
<p><b>1. Verification of fitness for duty to assess the ability to perform the duties of the job in a safe, secure, productive, and effective manner.</b></p>	<p>Completed statement or attestation of fitness for duty from the provider that is confirmed either by the director of a training program, chief of staff/services at a hospital where privileges exist, or a licensed physician designated by the health center.</p>	<p>Completed statement or attestation of fitness for duty from the provider that is confirmed by a licensed physician designated by the health center.</p>
<p><b>2. Verification of immunization and communicable disease status</b></p>	<p><b>Immunization Status:</b> Copy of immunization records/status in provider’s file or provider attestation, including, if applicable, any declinations.</p> <p><b>Note:</b> <i>The CDC has recommendations and many states have varying requirements for health care worker/provider vaccinations. The CDC recommendations are available at <a href="http://www.cdc.gov/vaccines/adults/rec-vac/hcw.html">http://www.cdc.gov/vaccines/adults/rec-vac/hcw.html</a>. Health centers will determine what vaccinations are required for their clinical staff based on state requirements and other resources.</i></p> <p><b>Communicable Disease Status:</b> Copy of completed TB test or screening (e.g., copy of PPD testing or CXR) and any other communicable disease testing or screening as determined by the health center (e.g., Hepatitis).</p> <p><b>Note:</b> <i>The health center determines communicable disease screening protocols for its health care workers as well as what sources will be accepted as verification, and circumstances, if any, when providers can decline to present for testing or screening.</i></p>	<p>Same as LIPs.</p>

<u>Privileging Activity</u>	Examples of documentation for Licensed Independent Practitioner (LIP)	Examples of documentation for Other Licensed or Certified Practitioner (OLCP) and Other Clinical Staff
<p><b>3. Verification of current clinical competence</b></p>	<p>For initial privileging: Verification of current clinical competence via training, education, and, as available, reference reviews.</p> <p>For renewal of privileges: Verification of current clinical competence via peer review or other comparable methods (for example, supervisory performance reviews).</p>	<p>Supervisory evaluation of clinical competence per job description.</p>