

Opening a program: personnel file timeline

Personnel file checklist

Reviewed 2026-10-25. Every line cites the rule it comes from. This checklist is general information, not legal advice.

BEFORE THE FIRST HIRE

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| ☐ Written intervals for job description review, re-verification of backgrounds, credentials and fitness for duty, competency assessment, performance appraisal and driver record review
The organization Before the first hire; surveyors check the files against these schedules | CARF 1.1.4, 1.1.5, 1.1.8, 1.1.9 and 1.H.13, 2026 Behavioral Health manual
CARF accreditation |
| ☐ Register with the Care Provider Background Screening Clearinghouse and initiate each check there before referring anyone for fingerprinting
The provider Before the first screening referral | s. 435.12(2)(d), F.S.
Florida DCF-licensed providers |

FEDERAL, FROM THE FIRST HIRE

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| ☐ Form I-9 Section 1, completed and signed by the employee
Every employee At the time of hire, the day employment begins | 8 CFR 274a.2(b)(1)(i)(A); 274a.1(c)
Federal (all employers) |
| ☐ Form I-9 Section 2, completed after examining the employee's documents
Every employee Within three business days of hire | 8 CFR 274a.2(b)(1)(ii)(B)
Federal (all employers) |
| ☐ OIG exclusion list check, with the result and date saved
Every employee and contractor Before hire, then monthly: OIG's recommendation, binding only where a contract or state rule makes it so | 42 CFR 1001.1901(b)(1); 42 CFR 1003.200(b)(4); OIG, Updated Special Advisory Bulletin (May 8, 2013), p. 15
Federal (payment bar); frequency is a recommendation |
| ☐ Stand-alone background check disclosure and the person's written authorization
Applicants and employees checked through a consumer reporting agency Before the report is obtained | 15 U.S.C. 1681b(b)(2)(A)
Federal (Fair Credit Reporting Act) |
| ☐ Copy of the report and the written summary of rights, sent before any adverse action
Anyone you may act against based on the report Before the adverse action; the statute sets no waiting period | 15 U.S.C. 1681b(b)(3)(A)
Federal (Fair Credit Reporting Act) |
| ☐ HIPAA privacy training on your policies, documented
Every workforce member, including volunteers and trainees Within a reasonable period after joining; again after a material policy change that affects the job | 45 CFR 164.530(b)(2); 160.103
HIPAA covered entities |
| ☐ Medical information kept in a separate, confidential medical file, not the personnel file
Anyone given a post-offer or employee medical examination or inquiry Whenever medical information is collected | 29 CFR 1630.14(b)(1), (c)(1); 1630.2(e)(1)
Federal (employers with 15 or more employees) |

☐	Bloodborne pathogens training Employees with occupational exposure At initial assignment to tasks with exposure	29 CFR 1910.1030(g)(2)(ii)(A) Federal OSHA
☐	Hepatitis B vaccination offered, or the signed declination Employees with occupational exposure After training and within 10 working days of initial assignment	29 CFR 1910.1030(f)(2)(i), (iv) Federal OSHA
BEFORE THE LICENSE: FLORIDA (DCF, CH. 397)		
☐	Personnel record with the seven items: job description and proof of minimum qualifications, application or resume, annual appraisal, signed orientation and policy acknowledgment, verified or certified credentials, screening documentation, training documentation All staff At hire; appraisal annually	Fla. Admin. Code R. 65D-30.004(4)(a)1.-7. All DCF-licensed providers
☐	Level 2 eligibility determination, role-based route All owners, directors, chief financial officers and clinical supervisors Before the person has contact with any vulnerable person in the screened role; hire for training and orientation only is permitted before results arrive	s. 397.4073(1)(a)1., F.S.; s. 435.06(2)(a) and (2)(d), F.S.; s. 397.4073(1)(h), F.S. All DCF-licensed providers; inmate substance abuse programs operated directly or under contract with the Department of Corrections are exempt
☐	Documented orientation-only status with the start date, the no-direct-contact-with-vulnerable-persons restriction, and the date the restriction was lifted Anyone hired into a screened position before screening completes During the pre-clearance period	s. 435.06(2)(d), F.S.; s. 435.02(5), F.S. All DCF-licensed providers; the written record is recommended practice
☐	Attestation of Good Moral Character, form CF 1649 (June 2025) Individuals subject to level 2 background screening At the initial screening and with every rescreening	Fla. Admin. Code R. 65D-30.004(4)(b)3. All DCF-licensed providers
☐	Competency-and-ability packet for the applicant, chief executive officer, chief financial officers and clinical supervisors: education, previous employment history, and list of references Applicant, CEO, CFO(s), clinical supervisors With a new application, and whenever there is a change in chief executive officer, chief financial officer or clinical supervisor	Fla. Admin. Code R. 65D-30.0036(1)(c) and (2)(a) All DCF-licensed providers
BEFORE THE LICENSE: CALIFORNIA (DHCS)		
☐	Registration or certification with CAADE, CADTP or CCAPP, verified on the organization's registry Staff providing counseling services, unless exempt Before the first counseling service	HSC Sec. 11833(c)(1); 9 CCR Sec. 10564(c); Standards Sec. 36(c); MHSUDS IN 18-056 DHCS licensing and certification
☐	Health screening with a TB test Licensed residential and certified program staff 60 days before to 7 days after employment; TB renewed every year	9 CCR Sec. 10564(e)(1); Standards Sec. 36(d) DHCS licensing and certification
☐	Program director information form DHCS 5082 with the initial certification application, and evidence of at least two years of SUD work experience Certified program director With the initial certification application	Standards Sec. Sec. 10(a)(24), 36(a)(2) DHCS licensing and certification
BEFORE THE LICENSE: NEW JERSEY (DOH)		

☐	State-level criminal history background check supported by fingerprints, with the initiation date documented All staff, student interns and volunteers Initiated not later than the time of hiring	N.J.A.C. 8:111-3.5(a)2 residential (8:111)
☐	Contract arrangements with outside agencies disclosed as part of the facility's staffing patterns, criteria and credentials at licensure contracted staffing arrangements At licensure application and renewal	N.J.A.C. 8:111-2.3(i)3 residential (8:111)
☐	Written designation of the program director, clinical supervisor and counseling and/or therapy staff Behavioral health services facilities Before services begin; updated on any change	N.J.A.C. 8:43K-6.2(a) outpatient (8:43K)
☐	Written policies identifying the circumstances and methods for criminal history record review of prospective and current employees The facility Before hiring; applied to each hire	N.J.A.C. 8:43K-4.11(a)7 and (a)7i outpatient (8:43K)

ACCREDITATION (CONFIRM IN YOUR CURRENT MANUAL)

☐	Verification of backgrounds, credentials and fitness for duty, with the source, method and date recorded All personnel, under your written verification procedures Before the person provides services, then on the schedule your written procedures set	CARF 1.1.5, 2026 Behavioral Health manual; Section 1.I key area (CARF behavioral health survey report, Nov. 2025) CARF accreditation
☐	Competency-based training on health and safety All personnel At orientation and at least annually	CARF 1.H.4, 2026 Behavioral Health manual; Section 1.H key area (CARF behavioral health survey report, Nov. 2025) CARF accreditation
☐	Survey application submitted, and a full personnel file audit run at the same time The organization At least three months before the preferred two-month survey window	carf.org, Survey preparation; Steps to accreditation CARF accreditation; the audit is recommended practice
☐	Quality Improvement Plan responding to the survey report The organization Within 90 days of being notified of the accreditation decision	carf.org, Steps to accreditation CARF accreditation
☐	Proof of application for accreditation at the first renewal, and proof of accreditation at later renewals, for each licensed component providing clinical treatment The provider First and subsequent license renewals	s. 397.403(3), F.S.; Fla. Admin. Code R. 65D-30.003(2)(a) Florida DCF-licensed providers of clinical treatment
☐	Notice to DCF of noncompliance with accrediting standards Accredited providers Within 10 days	Fla. Admin. Code R. 65D-30.003(2)(b) Florida DCF-licensed providers

OPIOID TREATMENT PROGRAMS

☐	Current, valid accreditation by an approved accreditation body The program Before SAMHSA certification, then maintained	42 CFR 8.11(a)(2) Federal (SAMHSA-certified OTPs)
☐	Physician license in the jurisdiction where the OTP is located Medical director At appointment and at each renewal date	42 CFR 8.2 (medical director) Federal (SAMHSA-certified OTPs)
☐	Written notice to SAMHSA of the change Program sponsor or medical director replaced or changed in status Within 3 weeks	42 CFR 8.11(e)(5) Federal (SAMHSA-certified OTPs)

AFTER LICENSURE: RECURRING

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| ☐ Rescreening result
Everyone subject to screening Within five years of the last screening results or five years from licensure, employment or entry into the contract, whichever falls first | Fla. Admin. Code R.
65D-30.004(4)(b)3.; s. 408.809(2), F.S.
All DCF-licensed providers |
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| ☐ Clearinghouse roster reconciled against the actual staff list, with a dated log of status changes reported
All screened staff Initial status and any change in status reported within 5 business days | s. 435.12(2)(c), F.S.
All DCF-licensed providers |
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| ☐ Counselor registration renewed every year, since a registration is valid for one year
Registered counselors Before expiration; first-year registrants apply at least 120 days before | BHIN 25-029 Sec. 2.C
DHCS licensing and certification |
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| ☐ Annual bloodborne pathogens training
Employees with occupational exposure Within one year of the previous training | 29 CFR 1910.1030(g)(2)(ii)(B), (iv)
Federal OSHA |
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| ☐ Annual Conformance to Quality Report
CARF-accredited organizations Annually; CARF sends the form about ten weeks before it is due | carf.org, Steps to accreditation
CARF accreditation |

Build the files once, for every clock

Corvara HR tracks each row above as a requirement on the employee's file, with its own due date, document and reminder before it lapses, so the state's list, your accreditor's schedule and the federal items sit in one place from the first hire. A primary source