

CARF behavioral health personnel files

Personnel file checklist

Reviewed 2026-10-15. Every line cites the rule it comes from. This checklist is general information, not legal advice.

EVERY EMPLOYEE

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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) |
| ☐ Form I-9 kept on file
Every employee and former employee Three years after hire or one year after termination, whichever is later | 8 CFR 274a.2(b)(2)(i)(A)
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 |
| ☐ 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 |
| ☐ Participation in the security awareness and training program
All workforce, including management The program is required; current rules set no frequency | 45 CFR 164.308(a)(5)(i)
HIPAA covered entities |
| ☐ HIPAA training and sanction documentation retained
Every workforce member Six years from creation or from when it was last in effect, whichever is later | 45 CFR 164.530(e)(2), (j)(2)
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) |

BACKGROUND CHECKS THROUGH A SCREENING COMPANY

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| ☐ 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) |

☐	Adverse action notice Anyone you acted against based on the report After the adverse action	15 U.S.C. 1681m(a) Federal (Fair Credit Reporting Act)
STAFF WITH OCCUPATIONAL EXPOSURE TO BLOOD		
☐	Bloodborne pathogens training Employees with occupational exposure At initial assignment to tasks with exposure	29 CFR 1910.1030(g)(2)(ii)(A) Federal OSHA
☐	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
☐	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
☐	Training record: dates, content, trainer names and qualifications, attendee names and job titles Every training session Keep 3 years from the training date	29 CFR 1910.1030(h)(2) Federal OSHA
☐	Exposure medical record, including hepatitis B vaccination status, kept confidential Employees with occupational exposure Duration of employment plus 30 years	29 CFR 1910.1030(h)(1)(ii)(B), (iii)-(iv) Federal OSHA
OPIOID TREATMENT PROGRAMS		
☐	Education, training or experience for the assigned functions, documented Each person engaged in OUD treatment At hire and when duties change	42 CFR 8.12(d) Federal (SAMHSA-certified OTPs)
☐	Current license or certification Practitioners and other licensed or certified staff, including counselors Kept current; checked at hire and at each renewal date	42 CFR 8.12(d) Federal (SAMHSA-certified OTPs)
☐	Counselor qualifications by education, training or experience Program counselors At hire	42 CFR 8.12(f)(5)(i) 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)
☐	Staff responsibilities assigned in the diversion control plan OTP providers and administrative staff Kept current with the plan	42 CFR 8.12(c)(2) Federal (SAMHSA-certified OTPs)
PSYCHIATRIC RESIDENTIAL TREATMENT FACILITIES (UNDER 21)		
☐	Training and demonstrated competency in triggers, nonphysical intervention and safe restraint and seclusion Staff who manage a resident's health or take part in emergency safety interventions, including contract staff Before participating in an emergency safety intervention	42 CFR 483.376(a), (e); 483.352 Federal (Medicaid PRTFs)
☐	Competency demonstration in those techniques Same staff Semiannually	42 CFR 483.376(f) Federal (Medicaid PRTFs)

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| ☐ | CPR certification, with periodic recertification, and an annual CPR competency demonstration
Same staff Annually for the demonstration | 42 CFR 483.376(b), (f)
Federal (Medicaid PRTFs) |
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| ☐ | Personnel record entry showing the training and competency were completed, the date and the name of the person certifying
Same staff Each time training or a demonstration is completed | 42 CFR 483.376(g)
Federal (Medicaid PRTFs) |
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| ☐ | Emergency preparedness training, documented
All staff, people providing services under arrangement and volunteers Initial training, then every 2 years | 42 CFR 441.184(d)(1)
Federal (Medicaid PRTFs) |

MEDICARE-CERTIFIED COMMUNITY MENTAL HEALTH CENTERS

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| ☐ | License, certification or registration, kept current
Professionals furnishing services directly, under contract or under arrangement Kept current at all times | 42 CFR 485.904(a)
Federal (Medicare CMHCs) |
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| ☐ | Discipline-specific qualifications
Administrator, clinical staff and other listed disciplines At hire | 42 CFR 485.904(b)
Federal (Medicare CMHCs) |
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| ☐ | Initial orientation on the duties of the job
Each individual furnishing services At the start of work | 42 CFR 485.918(d)(2)
Federal (Medicare CMHCs) |
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| ☐ | Skills and competence assessment, with in-service training where indicated
All individuals furnishing care, including volunteers Ongoing; keep a written description of the previous 12 months of in-service training | 42 CFR 485.918(d)(3); 485.902
Federal (Medicare CMHCs) |
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| ☐ | Restraint and seclusion training (or training in the alternatives) with demonstrated competency, documented in the personnel record
Appropriate client care staff Before use, at orientation, then periodically under the CMHC's policy | 42 CFR 485.910(f)(1), (4)
Federal (Medicare CMHCs) |
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| ☐ | Emergency preparedness training, documented
All staff, people providing services under arrangement and volunteers Initial training, then at least every 2 years | 42 CFR 485.920(d)(1)
Federal (Medicare CMHCs) |

DIRECT HHS GRANT RECIPIENTS

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| ☐ | Drug-free workplace statement given to the employee
Each employee engaged in work on the award Statement and awareness program in place within 30 days after an award of 30 days or more | 2 CFR 182.205, 182.210, 182.220; 2 CFR 382.20
Federal (direct HHS grant recipients) |
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| ☐ | Employee's written notice of a workplace drug conviction, your agency notice and your follow-up action
Employees engaged in work on the award Employee within 5 calendar days; agency notice within 10 calendar days; action within 30 calendar days | 2 CFR 182.205(c)(2), 182.225
Federal (direct HHS grant recipients) |

CARF-ACCREDITED PROVIDERS (CONFIRM IN YOUR CURRENT MANUAL)

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| ☐ | Verification of background, 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 as your procedures and the law require | CARF Section 1.I key area (CARF behavioral health survey report, Nov. 2025)
CARF accreditation |
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☐	Current job description for the position All personnel At hire; reviewed and kept current	CARF Section 1.I, Workforce Development and Management CARF accreditation
☐	Orientation and onboarding, with documented training on the competencies the role requires All personnel At hire	CARF Section 1.I key area: workforce engagement and development CARF accreditation
☐	Performance appraisal for employees, or a documented review for contract personnel All personnel At the frequency your manual and policy set	CARF Section 1.I key area: performance appraisals CARF accreditation
☐	Competency-based training on health and safety procedures and practices All personnel At orientation, then at the frequency your manual sets	CARF Section 1.H key area (CARF behavioral health survey report, Nov. 2025) CARF accreditation
☐	Documented training on cybersecurity and the technology used in job duties All personnel At the frequency your manual and policy set	CARF Section 1.I (Standard 1.I.13 in CARF's 2026 CCRC manual; behavioral health numbering may differ) CARF accreditation
☐	Training for people who use or oversee AI tools Personnel who use or perform oversight of AI tools Regularly, under your AI policy; new for surveys from July 1, 2026	CARF AI standard in Section 1.A (CARF news release, Apr. 21, 2026) CARF accreditation
☐	Education and training on medication Direct service personnel in programs that use medication At orientation and at least annually	CARF Section 2.E Medication Use key area (CARF behavioral health survey report, Nov. 2025) CARF accreditation
☐	Competency-based training on preventing unsafe behaviors, and on seclusion and restraint where used Direct service personnel; personnel who administer seclusion or restraint At the frequency your manual sets	CARF Section 2.F Promoting Nonviolent Practices key areas (CARF behavioral health survey report, Nov. 2025) CARF accreditation
☐	Competency-based training on topics unique to the services and population served Direct service personnel in sobering center programs Annually	CARF sobering center standards, 2026 Behavioral Health manual (CARF news release, Jan. 13, 2026) CARF accreditation

Keep every file ready between CARF surveys

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. A primary source verification records what was checked, against which source, by whom and when; training that must be