

Home health and hospice personnel file audit checklist

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 | 8 CFR 274a.2(b)(1)(i)(A)
Federal (all employers) |
| ☐ Form I-9 Section 2, completed after examining the identity and work authorization documents
Every employee Within three business days of hire; at hire for a job of less than three business days | 8 CFR 274a.2(b)(1)(ii)-(iii)
Federal (all employers) |
| ☐ Form I-9 reverification when work authorization expires
Employees with time-limited work authorization No later than the date the authorization expires | 8 CFR 274a.2(b)(1)(vii)
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); OIG, Updated Special Advisory Bulletin (May 8, 2013), p. 15
Federal (payment bar); frequency is a recommendation |
| ☐ Emergency preparedness training record
Home health: all staff, staff under arrangement and volunteers. Hospice: employees and staff under arrangement Initial training, then at least every 2 years, and after a significant policy update | 42 CFR 484.102(d)(1); 418.113(d)(1)
Medicare CoP (HHA and hospice) |
| ☐ Infection control education, with the date and topic
Home health staff; hospice employees and contracted providers No frequency set; document each session | 42 CFR 484.70(c); 418.60(c)
Medicare CoP (HHA and hospice) |

STAFF WITH OCCUPATIONAL EXPOSURE TO BLOOD

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| ☐ Bloodborne pathogens training
Employees with occupational exposure At initial assignment, then within one year of the previous training | 29 CFR 1910.1030(g)(2)(ii), (iv)
Federal OSHA (all employers) |
| ☐ Training record with session dates, a summary of contents, trainer names and qualifications, and attendee names and job titles
Employees with occupational exposure Kept 3 years from the training date | 29 CFR 1910.1030(h)(2)
Federal OSHA (all employers) |
| ☐ Hepatitis B vaccine made available at no cost
Employees with occupational exposure, unless already vaccinated, immune or medically contraindicated After training and within 10 working days of initial assignment | 29 CFR 1910.1030(f)(1)-(2)
Federal OSHA (all employers) |
| ☐ Signed Appendix A hepatitis B vaccine declination
Employees who decline the vaccine When the employee declines | 29 CFR 1910.1030(f)(2)(iv) and Appendix A
Federal OSHA (all employers) |

☐	Hepatitis B vaccination status in a confidential employee medical record Employees with occupational exposure Kept for the duration of employment plus 30 years	29 CFR 1910.1030(h)(1) Federal OSHA (all employers)
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LICENSED AND PROFESSIONAL STAFF

☐	Current license, certification or registration as the state requires, with its expiration date Home health: all persons furnishing services to patients. Hospice: all professionals, including under contract or arrangement At hire, and kept current at all times	42 CFR 484.100(b); 418.114(a) Medicare CoP (HHA and hospice)
☐	Administrator qualification: physician, registered nurse or undergraduate degree, plus at least 1 year of supervisory or administrative experience in home health care or a related program Home health administrator hired on or after January 13, 2018 At appointment	42 CFR 484.115(a)(2); Appendix B, G1052 Medicare CoP (HHA)
☐	Written authorization of the pre-designated alternate administrator, by the administrator and the governing body Home health alternate administrator Before the alternate acts	42 CFR 484.105(b)(2) Medicare CoP (HHA)
☐	Clinical manager qualification: physician, physical therapist, speech-language pathologist, occupational therapist, audiologist, social worker or registered nurse Home health clinical manager At appointment	42 CFR 484.115(c) Medicare CoP (HHA)
☐	Registered nurse: graduate of an approved school of professional nursing, licensed in the state Registered nurses At hire	42 CFR 484.115(k); 418.114(a), (c)(1) Medicare CoP (HHA and hospice)
☐	Licensed practical nurse: completed a practical nursing program, licensed in the state, supervised by a qualified registered nurse Licensed practical nurses At hire	42 CFR 484.115(e); 418.114(a), (c)(2) Medicare CoP (HHA and hospice)
☐	Social worker: the degree and the 1 year of health care social work experience the rule requires, and MSW supervision where the hospice rule requires it Social workers At hire	42 CFR 484.115(m); 418.114(b)(3) Medicare CoP (HHA and hospice)
☐	Social work assistant: qualifying degree and experience, or experience plus a proficiency examination, and supervision by a qualified social worker Home health social work assistants At hire	42 CFR 484.115(l) Medicare CoP (HHA)
☐	Therapist and therapy assistant qualification: state licensure where it applies, accredited education and the qualifying examination Physical, occupational and speech-language therapists and assistants; audiologists At hire	42 CFR 484.115(b), (f)-(i), (n); 418.114(b)(4)-(8) Medicare CoP (HHA and hospice)
☐	Participation in agency-sponsored in-service training Skilled and licensed professionals Ongoing; record attendance	42 CFR 484.75(b)(9); 418.62(c) Medicare CoP (HHA and hospice)
☐	Hospice administrator is a hospice employee with the education and experience the governing body requires Hospice administrator At appointment	42 CFR 418.100(b) Medicare CoP (hospice)

☐	Medical director is a doctor of medicine or osteopathy, employed or under contract Hospice medical director At designation	42 CFR 418.102 Medicare CoP (hospice)
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HOME HEALTH AIDES

☐	Proof of the qualifying route: training plus competency evaluation, competency evaluation alone, a state-approved nurse aide program with current good standing on the registry, or a qualifying state licensure program Home health aides Before furnishing services	42 CFR 484.80(a)(1) Medicare CoP (HHA)
☐	Check for a lapse of 24 consecutive months without paid services since the program was completed Home health aides At hire	42 CFR 484.80(a)(2) Medicare CoP (HHA)
☐	Training documentation: at least 75 hours, with at least 16 classroom hours before at least 16 supervised practical hours, covering the listed subjects Aides qualifying through a training program Before furnishing services	42 CFR 484.80(b)(1)-(4) Medicare CoP (HHA)
☐	Competency evaluation by a registered nurse, with the five listed subject areas observed with a patient or pseudo-patient Every home health aide Before furnishing services	42 CFR 484.80(c)(1), (3), (5) Medicare CoP (HHA)
☐	Retraining and a passed re-evaluation for any task rated unsatisfactory Aides with an unsatisfactory rating Before performing the task without direct RN supervision	42 CFR 484.80(c)(4) Medicare CoP (HHA)
☐	At least 12 hours of in-service training, supervised by a registered nurse Every home health aide Each 12-month period	42 CFR 484.80(d); Appendix B, G774 Medicare CoP (HHA)
☐	On-site observation of the aide performing care with a patient Aides serving patients who receive skilled services Annually	42 CFR 484.80(h)(1)(iv) Medicare CoP (HHA)
☐	On-site observation of the aide performing non-skilled care Aides serving patients who receive no skilled services Semi-annually	42 CFR 484.80(h)(2)(ii) Medicare CoP (HHA)
☐	Retraining and a competency evaluation for the deficient and all related skills Aides with a deficiency verified on site After the visit that verified it	42 CFR 484.80(h)(3) Medicare CoP (HHA)
☐	Instructor qualifications: a registered nurse with 2 years of nursing experience, 1 in home health care, or someone under that nurse's general supervision Agencies that train their own aides At training	42 CFR 484.80(e)-(f) Medicare CoP (HHA)
☐	State qualification standards met, and competency shown in the services the aide furnishes Aides furnishing only Medicaid personal care services Before furnishing personal care services	42 CFR 484.80(i) Medicare CoP (HHA)

HOSPICE AIDES AND HOME MAKERS

☐	Proof of the qualifying route: training plus competency evaluation, competency evaluation alone, a state-approved nurse aide program with current good standing on the registry, or a state licensure program Hospice aides Before furnishing services	42 CFR 418.76(a)(1) Medicare CoP (hospice)
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☐	Check for a lapse of 24 consecutive months without paid services since the program was completed Hospice aides At hire	42 CFR 418.76(a)(2) Medicare CoP (hospice)
☐	Training documentation: at least 75 hours, with at least 16 classroom hours before at least 16 supervised practical hours, covering the listed subjects Aides qualifying through a training program Before furnishing services	42 CFR 418.76(b)(1)-(4) Medicare CoP (hospice)
☐	Competency evaluation by a registered nurse, with the five listed subject areas observed with a patient or pseudo-patient Every hospice aide Before furnishing services	42 CFR 418.76(c) Medicare CoP (hospice)
☐	At least 12 hours of in-service training, supervised by a registered nurse Every hospice aide Each 12-month period: calendar year, employment anniversary or rolling 12 months	42 CFR 418.76(d); Appendix M, L620 Medicare CoP (hospice)
☐	On-site observation of the aide performing care, by a registered nurse Every hospice aide Annually	42 CFR 418.76(h)(2); Appendix M, L632 Medicare CoP (hospice)
☐	Competency evaluation of the deficient skill and all related skills Aides with a concern verified on site After the visit that verified it	42 CFR 418.76(h)(1)(iii) Medicare CoP (hospice)
☐	Hospice orientation on the needs and concerns of patients and families coping with a terminal illness, or hospice aide qualification Homemakers Before furnishing homemaker services	42 CFR 418.76(j) Medicare CoP (hospice)

HOSPICE: EMPLOYEES, VOLUNTEERS AND CONTRACTED STAFF

☐	Orientation about the hospice philosophy Employees and contracted staff with patient and family contact At orientation	42 CFR 418.100(g)(1) Medicare CoP (hospice)
☐	Initial orientation on the employee's specific job duties Each employee; part 418 counts volunteers as employees At hire	42 CFR 418.100(g)(2); 418.3 Medicare CoP (hospice)
☐	Assessment of skills and competence, by the method your written policy describes All individuals furnishing care, including volunteers As your written policy sets	42 CFR 418.100(g)(3) Medicare CoP (hospice)
☐	Criminal background check, with the date obtained Employees with direct patient contact or access to patient records As state law requires; where it sets nothing, within three months of employment, covering every state lived or worked in during the past 3 years	42 CFR 418.114(d) Medicare CoP (hospice)
☐	Contract clause requiring criminal background checks of contracted employees with patient contact or record access Contracted entities In every such contract	42 CFR 418.114(d)(1) Medicare CoP (hospice)
☐	Volunteer orientation and training records Hospice volunteers Consistent with hospice industry standards	42 CFR 418.78(a) Medicare CoP (hospice)
☐	License or registration, where the state requires one Volunteers who provide professional services Before providing professional services	Appendix M, L644; 42 CFR 418.114(a) CMS surveyor guidance (hospice)

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| ☐ | Restraint and seclusion training and demonstrated competency, documented in the staff personnel record
Patient care staff in a hospice inpatient facility Before performing these actions, during orientation, then periodically as hospice policy sets | 42 CFR 418.110(o)(1), (4)
Medicare CoP (hospice inpatient) |
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STAFF UNDER ARRANGEMENT AND CONTRACTORS

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| ☐ | Written agreement, and confirmation the entity or individual has not been denied enrollment, excluded, terminated, revoked or debarred
Home health services under arrangement Before services begin | 42 CFR 484.105(e)(2)
Medicare CoP (HHA) |
| ☐ | Training or competency evaluation records
Home health aides furnished under arrangement Before furnishing services | 42 CFR 484.80(h)(5)(iii)
Medicare CoP (HHA) |
| ☐ | Written agreement requiring arranged services to be furnished safely and effectively by qualified personnel
Hospice services under arrangement Before services begin | 42 CFR 418.100(e)(2)
Medicare CoP (hospice) |

ACCREDITOR ADD-ONS (NOT FEDERAL LAW)

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| ☐ | Primary source verification of licensed staff credentials, with the date, who verified, what was verified and the result
Licensed staff, including contract staff At hire and before the credential expires (ACHC home health); when law or regulation requires the credential (Joint Commission) | ACHC HH4-2B.01 (Personnel Files Survey Checklist [802]; ACHC article, April 18, 2023); Joint Commission FAQ 000001472
Accreditor (ACHC, Joint Commission) |
| ☐ | Initial and annual TB screening, or screening at the type and frequency your annual TB risk assessment sets
Direct care personnel At hire, then annually | ACHC HH4-2C.01, HSP4-2C.01 ([802], [803], [514], [518]); CHAP IPC.14 (Home Health Policy List, July 2025)
Accreditor (ACHC, CHAP) |
| ☐ | Hepatitis B vaccination record or signed declination
Employees At hire | ACHC HH4-2D.01, HSP4-2D.01
Accreditor (ACHC); OSHA also requires the declination for exposed staff |
| ☐ | Signed job description or contract
Employees and contract staff At hire, and again when the description is revised | ACHC HH4-2E.01, HSP4-2E.01; CHAP HSRM.2.D (Hospice Policy List, July 2025)
Accreditor (ACHC, CHAP) |
| ☐ | Criminal background check, OIG exclusion list check and, if applicable, national sex offender registry check, each documented
Employees At hire | ACHC HH4-2H.01, HSP4-2H; Joint Commission FAQ 000001098
Accreditor (ACHC, Joint Commission) |
| ☐ | Current driver's license and motor vehicle record check
Staff who drive as part of their duties At hire | ACHC HH4-2F.01, HSP4-2F.01 (checklist numbers; confirm in your current manual)
Accreditor (ACHC) |
| ☐ | Position application and dated, signed withholding statements
Employees (not contract staff) At hire | ACHC HH4-1A.02, HSP4-1A.02 (checklist numbers; confirm in your current manual)
Accreditor (ACHC) |
| ☐ | Evidence of access to personnel policies
Employees (not contract staff) At hire | ACHC HH4-2I.01, HSP4-2I.01
Accreditor (ACHC) |

☐	Verification of qualifications for non-licensed personnel Unlicensed staff At hire	ACHC HH4-4A.01, HSP4-2B Accreditor (ACHC)
☐	Evidence of orientation Employees At hire	ACHC HH4-5A.01, HSP4-4A Accreditor (ACHC)
☐	Initial and annual competency assessment Direct care personnel, including contract staff At hire, then annually (ACHC); at orientation, then at least every three years (Joint Commission, as of its 2021 sample policy)	ACHC HH4-6A.01, HSP4-7A; Joint Commission HR.01.06.01, EP 6 (2021) Accreditor (ACHC, Joint Commission)
☐	Initial and annual on-site observation visit Direct care personnel, including contract staff At hire, then annually	ACHC HH4-7C.01, HSP4-10A.03; CHAP HRM.23 for home health aides (Home Health Policy List, July 2025) Accreditor (ACHC, CHAP)
☐	Most recent annual performance evaluation, reviewed and signed by the employee Employees Annually	ACHC HH4-2J.01, HSP4-2J.01; CHAP HRM.22, HSRM.29.D (July 2025 policy lists) Accreditor (ACHC, CHAP)
☐	In-service education of 12 hours for direct care personnel and 8 hours for non-direct care personnel, covering ACHC's required topics All personnel In the past 12 months	ACHC HH4-8A.01, HSP4-6A.01 (Annual Compliance Checklists [514], [518]) Accreditor (ACHC)
☐	Signed confidentiality statement Employees At hire	ACHC HH2-5A, HSP2-5A Accreditor (ACHC)
☐	Evidence of CPR certification, if applicable Roles your policy names At hire; renew before it expires	ACHC HH2-6B.01, HSP2-6A.01 Accreditor (ACHC)
☐	Conflict of interest disclosure, if applicable Staff in the positions your policy names At hire	ACHC HH1-4A.01, HSP1-3A.01 Accreditor (ACHC)
☐	Audit of personnel records for all required elements, with a plan of correction for the gaps The agency Each year	ACHC Annual Compliance Checklists [514], [518] (a recommendation, not a numbered standard) Accreditor recommendation (ACHC)

Audit once, then keep every file audit-ready

Corvara HR was built for this audit. Each row above can be a requirement on the employee's file, with its own due date, document, primary source verification record and reminder ladder, so the 12 in-service hours, the annual aide observation and the two-year