

<b>Policy Title: License, Certificate, and Registration Verification</b>	<b>Policy Number: NATL.HR.010</b>
<b>Owner Department: Human Resources</b>	<b>Effective Date: 12/7/15</b>
<b>Custodian: Chair, National HR Policy Roundtable</b>	<b>Page: 1 of 5</b>

## 1.0 Policy Statement

When licenses, certificates, and/or registrations (LCR)s are required by law, accreditation standards, or Kaiser Permanente (KP) policy, it is the employee's responsibility to ensure that the LCRs are valid and current. KP does not permit employees to work without required LCRs.

## 2.0 Purpose

The purpose of this policy is to ensure that employees maintain all job-required licenses, certifications and registrations.

## 3.0 Scope/Coverage

This policy applies to employees and applicants for employment with any of the following entities (collectively referred to as "Kaiser Permanente"):

- 3.1** Kaiser Foundation Hospitals and Kaiser Foundation Health Plan, Inc. (together, KFH/HP);
- 3.2** KFH/HP's subsidiaries;
- 3.3** The Permanente Medical Group, Inc. (TPMG) [NOTE: This policy does not apply to physicians, podiatrists or Vice Presidents of TPMG, who are covered by separate TPMG policies]; and
- 3.4** Southern California Permanente Medical Group (SCPMG) [NOTE: This policy does not apply to physicians of SCPMG].

## 4.0 Definitions

- 4.1 Cards of Completion (COC)** — There are two types of COCs: 1) a state issued driver's license, and 2) a document or other evidence of satisfactory course completion, typically issued by a professional organization, such as the American Heart Association. COCs may have an expiration date and may require Primary Source Verification. Examples: Hawaii Driver's License (Accomplishment Code: HI-DL), Basic Life Saving (Accomplishment Code: US-BLS), Advanced Cardiac Life Saving (Accomplishment Code: US-ACLS) and Neonatal Resuscitative Provider (Accomplishment Code: US-NRP), and LA County Hospital Fire and Safety Card (CA-LAHLs).
- 4.2 License, Certificate, and/or Registration (LCR)** — Official permit or COC issued by a state or federal government, private agency, board, professional association, or other organization that allows the holder to perform a specific duty, and that is required of Kaiser Permanente employees. LCRs may permit the holder to designate him/herself as so licensed, certified or registered. Examples: Registered Nurse (RN), Certified Radiologic Technologist (CRT), Registered Dietician (RD).

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**4.3 Primary Source Verification (PSV)** — Documents or other evidence obtained directly from the original (primary) state or federal government, private agency, board, professional association or other organization documenting the status of an LCR (e.g., whether it is current, restricted or limited).

## 5.0 Provisions

### 5.1 Employee Responsibilities

**5.1.1** Each employee is responsible for:

**5.1.1.1** obtaining and maintaining LCRs in good-standing;

**5.1.1.2** practicing within his/her scope of practice as defined by the law and professional standards, which may be narrower if so defined by KP policy [NOTE: In the National Labor Management Partnership Agreement, the parties agreed to issue resolution to address concerns of limitations to scope of practice by KP policy];

**5.1.1.3** keeping abreast of issues and developments within his/her profession that may result in changes in LCR requirements;

**5.1.1.4** meeting new requirements to ensure LCRs are current and valid;

**5.1.1.5** immediately notifying KP if any LCR is revoked, suspended, restricted, limited, expired or not renewed; and

**5.1.1.6** using the same identical name that is on his/her Social Security card for his/her LCR, all documentation pertaining to his/her clinical practice and work, and the name used in KP systems that determine his/her pay and benefits. If the names indicated on the documentation are not an exact match, the employee must be able to provide information so KP can verify with reasonable certainty that the names refer to that employee.

**5.1.2** KP may provide courtesy notifications to employees to remind them of these responsibilities. However, employees should not rely solely on this notification before taking appropriate steps to ensure their LCRs remain valid and do not expire.

### 5.2 Process for Verification

**5.2.1** Verification of LCR requires PSV.

**5.2.2** Recruitment verifies the required LCRs for all applicants, including rehired employees and employees pursuing transfers into new positions.

**5.2.3** For government or private boards or agencies or other organizations that have this information "on-line," the verification process is to be completed using the issuing organization's website.

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**5.2.4** At the time of renewal for current employees, the applicable KP LCR specialist verifies LCRs with the issuing organization, online, by phone, or by fax.

**5.2.5** For some requirements (e.g., COCs, training certificates), evidence of completion must be submitted by the employee.

**5.2.6** Since COCs, training certificates, and other documents are not subject to PSV, the employee or applicant must present original documentation as evidence of completion.

### 5.3 Expiration of LCRs

**5.3.1** In some regions, employees who have LCRs that are expiring may receive a courtesy notification from KP before the expiration date. It remains an employee's responsibility to maintain current LCR. This notification is to serve as a reminder of his/her responsibility.

**5.3.2** Employees who have LCRs that expire while they are on approved leave (e.g., for medical, military or personal reasons) must have their LCRs renewed before they return to work.

**5.3.3** Should an employee who is not already on an approved leave permit his/her LCR to expire, even if application for renewal has been made, or if the LCR is suspended, the employee is placed on an unpaid leave or he/she will not be scheduled to work. If appropriate current documentation of the LCR is not obtained and presented within the region's/state's specified timeframe<sup>1</sup>, the employee is terminated.

**5.3.4** Any manager who knowingly permits an unlicensed person to work for him/her for any reason (including failure to obtain the initial LCR) after the date of expiration, suspension, or revocation of a LCR will be subject to corrective/disciplinary action, up to and including termination.

**5.3.5** If a manager knowingly permits a person to work with a limited and/or restricted LCR, and the role requires an unlimited or unrestricted LCR, the manager will be subject to corrective/disciplinary action, up to and including termination.

### 5.4 Outside Agency Personnel

**5.4.1** Contracts with external employment agencies or independent contractors must stipulate that healthcare workers must undergo screening as described in this policy before they may provide care, treatment, and services for KP that require a LCR.

<sup>1</sup> --For the Colorado, Georgia, Northwest, and Southern California Regions, if appropriate current documentation of the license, certificate, or registration is not obtained and presented within **14 calendar days**, the employee is terminated.  
 --For the Hawaii, Mid-Atlantic and Northern California Regions and for National functions (KP-IT/Program Offices), if appropriate current documentation of the license, certificate, or registration is not obtained and presented within **30 calendar days**, the employee is terminated.

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**5.4.2** Before Contingent Workers begin to provide care, treatment, and services to KP, managers must re-verify LCRs, as stipulated in NATL.HR.035, Contingent Workers.

## 6.0 References/Appendices

- 6.1** Intent of HR Policies
- 6.2** NATL.HR.011, *Employment Screening*
- 6.3** NATL.HR.023, National Provider Identifier
- 6.4** NATL.HR.035, Contingent Workers
- 6.5** National HR Procedure, *Verification of Licenses, Certificates, Registrations, and Competencies*
- 6.6** Addendum: Employees Employed in California who are on Active Military Duty

## 7.0 Approval

### Update approval, 12/7/15

In accordance with the charter of the National HR Policy Roundtable, this policy update was approved by the National HR Policy Roundtable members, as chaired by Francie Sloan.

### Policy Revision History

Original Approvals	Update Approvals	Revision Approvals
Approval Date: n/a	Approval Date: 03/01/07; 08/20/07; 03/18/10; 3/24/14; 12/7/15	Approval Date: 04/07/08; 5/17/12
Effective Date: 01/01/06	Effective Date: 03/01/07; 08/20/07; 03/18/10; 3/24/14; 12/7/15	Effective Date: 04/07/08; 5/17/12
Communicated Date: n/a		Communicated Date: n/a

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ADDENDUM

**Employees Employed in California who are on Active Military Duty**

In accordance with the California Business and Professions Code §§ 114, 114.5., a licensee or registrant of a board within the Department of Consumer Affairs whose license expires while on active duty as a member of the California National Guard or the United States Armed Forces is authorized to reinstate his or her license without examination or penalty unless the licensing agency determines that the applicant has not been actively engaged in his or her profession while on active duty.