

POLICY AND PROCEDURE

REACH for Tomorrow

Policy Title: Credential Verification and Privileging of Prescribers and Administering Staff

Effective Date: 08/15/2025

Approved By: Director of Medical and Clinical Services

Review Schedule: Annually or as Needed

Applies To: All Programs — Outpatient MH/SUD, IOP, PHP, and Integrated Primary Care/Behavioral Health

I. Purpose

To establish a uniform process for verifying credentials and determining clinical privileges for all prescribers and personnel authorized to administer medications at REACH for Tomorrow.

This policy ensures that only qualified, licensed, and competent professionals provide medication-related services in compliance with CARF 2025 Section 2 (Medication Standards), the Ohio Administrative Code, and applicable federal regulations.

II. Scope

This policy applies to all:

- Physicians, nurse practitioners, physician assistants, and any other prescribers providing services under REACH for Tomorrow;
- Licensed nurses and medical assistants who prepare or administer medications;
- Other designated clinical staff engaged in medication monitoring or handling;
- Contractors, temporary staff, and students participating in medication services.

III. Policy Statement

REACH for Tomorrow ensures that all individuals involved in prescribing or administering medications are appropriately credentialed, competent, and granted privileges that correspond to their education, training, experience, and current licensure.

Credential verification and privileging are required prior to the start of clinical duties and are maintained on an ongoing basis through periodic review.

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IV. Credential Verification Procedures

A. Verification of Credentials

1. All prescribers and medication-administering staff must provide evidence of:
 - Current professional licensure or certification from the appropriate Ohio licensing board;
 - DEA registration (if applicable to controlled substances);
 - National Provider Identifier (NPI);
 - Educational credentials and professional training;
 - Current resume/CV outlining relevant clinical experience;
 - Malpractice coverage and claims history;
 - Current CPR/BLS certification;
 - Background check and OIG/SAM exclusion screening clearance.
2. Verification is conducted by the Director of Medical and Clinical Services or designated administrative staff through primary source verification, including:
 - Ohio eLicense portal for state licensure verification;
 - DEA and NPI registries;
 - Professional education and certification sources;
 - Direct confirmation from prior employers or training institutions (when necessary).
3. Copies of verification documents are retained in the individual's Credentialing File, securely maintained in accordance with organizational policy and confidentiality laws.

B. Reverification and Maintenance

1. All licenses, certifications, and registrations must remain current and valid at all times.
2. REACH for Tomorrow tracks expiration dates of licenses and credentials via the Credential Monitoring System or internal calendar.
3. Staff are responsible for providing updated documentation prior to expiration.
4. Any lapse, disciplinary action, or restriction of licensure must be immediately reported to the Director of Medical and Clinical Services.
5. Failure to maintain current credentials results in immediate suspension of clinical privileges until reinstated.

V. Privileging Process

A. Definition of Privileging

Privileging is the formal process by which REACH for Tomorrow authorizes a licensed individual to provide specific medication-related services based on verified qualifications, demonstrated competence, and organizational need.

B. Privileging Procedures

1. Privileges are granted following verification of credentials and completion of orientation and competency evaluations.

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2. Privilege determinations are made by the Medical Director in collaboration with the Director of Medical and Clinical Services, based on:
 - Education and clinical training;
 - Documented experience in prescribing or administering medications;
 - Demonstrated competency in clinical practice;
 - Scope of practice defined by state law and professional standards.
3. The Privileging Form includes specific activities authorized, such as:
 - Prescribing medications within specialty area;
 - Administering oral, injectable, or topical medications;
 - Conducting medication monitoring and documentation;
 - Handling, storage, and disposal of medications;
 - Supervising other medication-handling staff (if applicable).
4. The Medical Director signs the privileging form to authorize practice, which is kept in the provider's Credentialing File.
5. Privileges are reviewed annually and whenever a significant change occurs in role, scope of practice, or competency.

VI. Competency Evaluation

1. All prescribers and medication-administering staff must demonstrate clinical competency before performing medication-related tasks independently.
2. Competencies are documented via Clinical Skills Checklists and include:
 - Safe medication administration;
 - Recognition and reporting of adverse reactions;
 - Documentation standards;
 - Infection control and disposal protocols;
 - Understanding of CARF Section 2 medication safety requirements.
3. Ongoing competency evaluations occur annually and during performance reviews or as part of QI audits.

VII. Oversight and Quality Assurance

- The Medical Director provides oversight of all credentialed prescribers and administering staff.
- Credentialing files are audited annually for completeness and compliance.
- The Quality Improvement Committee reviews credentialing and privileging compliance as part of annual performance indicators and risk management review.
- Any identified deficiencies result in a corrective action plan and follow-up verification.

VIII. References

- CARF 2025 Standards Manual, Section 2: Medication Use (2.A–2.H)
- Ohio Administrative Code 4723, 4729, 4731
- Ohio Revised Code Chapters 3719, 4723, 4729, 4731

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- DEA 21 CFR Part 1300-1316
- CMS Conditions of Participation: Credentialing and Privileging
- OIG Exclusion List and SAM.gov