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### Intent

This policy defines the requirements of an individual selected for an audit of their recertification application to include submitted education and documentation.

# Scope

This policy applies to applications submitted to the National Registry for recertification. Recertification audits apply to individuals who are National Registered. Audits for individuals who are State Licensed Only (SLO) must comply with this policy and audits are conducted in partnership with the state EMS office.

# Definitions

Incomplete – an application with education or documentation that does not meet recertification requirements

Non-compliance - Failure to respond or submit documentation to the National Registry regarding an audit status.

State Licensed Only (SLO) – An individual who is not nationally certified but holds current state EMS licensure in which National Registry manages their state recertification application and review through a partnership agreement.

# Policy

The National Registry reserves the right to audit and investigate applications submitted for the intent of recertifying a National Registry certification or in accordance with a state EMS office who has a statelicense only (SLO) partnership with the National Registry. An audited individual will be notified of their audit status. It is the responsibility of the audited individual to maintain updated profile demographics in their National Registry or SLO account, including email and notifications enabled. Compliance and successful completion of the audit process is the responsibility of the individual selected for audit.

The National Registry categorizes audits as follows:

- Level 1: Manual review of applications submitted under the current recertification model requirements.
- Level 2: An application selected for audit by a computerized, random sampling
- Level 3: An audit conducted due to information learned leading to a cause for review

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### **Types of Audits**

#### Level 1: Manual Review of application

Upon receiving a submitted application, National Registry conducts an initial review to ensure requirements of recertification are met. All education must be completed between the start of the current certification cycle date and the date of original application submission and before the current expiration date. An application can be either approved for recertification or reviewed as incomplete.

### Level 2: Computer-Generated Sampling

Applications are randomly selected for audit by a computer-generated algorithm. Computer-generated audits are selected within the recertification season:

- Emergency Medical Responder
  - April 1 to October 31
- Emergency Medical Technician, Advanced Emergency Medical Technician, Paramedic
  - $\circ \quad \mbox{October 1 to April 30}$

All education claimed on the recertification application must have supporting documentation as proof of education which complies with the National Registry *Accepted Education & Documentation Policy*.

The documented education must be completed within the individual's certification cycle prior to submission of the application and before the current expiration date, meet the current National Registry approved education standards in the *Accepted Education & Documentation Policy* and the *Academic Credit Policy*, and meet or exceed the requirements of the current National Registry endorsed recertification model.

Computer-generated audits are reviewed once all documentation is received by the National Registry.

#### Level 3: Audit Due to Cause

An audit of a current or past recertification application may be performed based on information learned or reported to the National Registry. An audit of a past recertification application may be audited up to five years. The individual will be notified of their audit status. The individual must provide documentation which supports the education submitted on the specific recertification application being audited within 30 days from the issuance of the first notification of the audit status.

#### **Compliance of the Audit**

#### Submitting proof of education, documentation

For an audit of any level, the audit may be successfully completed by submitting proof of education which supports the education claimed on the recertification application. If audited within the current certification cycle for a level 2 computer-generated audit, education must be submitted and audit status

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resolved by May 31 of the current year for EMT, AEMT, NRP, or by November 30 for EMR. No late submissions will be considered, and an individual will not be recertified until the audit has been satisfied. If the audit status is not resolved before May 31 or November 30 respectively, the individual will lapse. All documentation submitted which supports the education claimed on the application must meet the National Registry *Accepted Education & Documentation Policy* standards.

For Level 1 and 2 audits only, education can be exchanged within the application to satisfy recertification model requirements if an application is returned incomplete for corrections, but education must have a completion date between the start of the current certification cycle and prior to the original application submission date. If education cannot be exchanged to meet recertification requirements, recertification by examination may be considered.

For Level 3 audits, if an audit is conducted on a previous certification cycle or application, proof of education to support the audited application must be submitted within 30 days from the issuance of the first notification of the audit status. All documentation submitted which supports the education claimed on the application must meet the National Registry *Accepted Education & Documentation Policy* standards.

# Recertification by Examination

Alternatively, and in lieu of providing documentation or proof of education to support a submitted application before the current expiration date, a nationally certified individual may successfully complete the recertification by examination if the individual is within their current certification cycle and before their current expiration date.

One attempt can be made to successfully pass the recertification by examination at the individual's current certification level. If the audited individual passes the examination, they will have satisfied the requirements of the audit and will be recertified. If the examination is unsuccessful, the individual lapses on their current expiration date. Fees for the submitted initial recertification application and unsuccessful recertification by examination attempt are non-refundable.

If audited during the reinstatement period, the audited individual must provide proof of education and does not qualify for recertification by examination.

Recertification by examination is not an option for Level 3 audits on a current or previous certification cycle. Documentation for all education claimed on the audited application must be submitted.

# **Unsuccessful and Incomplete Audits**

National Registry reviews audits and may determine a status of incomplete or unsuccessful. If a state licensed only (SLO) application does not meet recertification requirements and/or the individual audited is unsuccessful or Non-Compliant, the respective state EMS office will be notified.

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Level 1: Manual Application Review

- If the application does not meet recertification requirements, the application may be returned Incomplete. An Incomplete application must be corrected and resubmitted prior to May 31 or November 30, respective of certification level. Once resubmitted, the application is reviewed for recertification criteria.
- If an individual does not correct or resubmit their application, the individual will lapse on their current expiration date.

*Note:* A level 3 audit can be generated if a level 1 application is returned incomplete three or more times or there is a cause for investigation.

Level 2: Computer-Generated Audits

- If documentation is received but documentation or the education claimed on the application does not meet recertification model requirements, the application may be returned to the individual as Incomplete and can be corrected and resubmitted for review.
- If documentation or proof of education are not submitted prior to May 31 or November 30, respective of certification level, the audit is considered unsuccessful by non-compliance and the individual lapses on their current expiration date.
- If documents are submitted but do not meet recertification requirements prior to May 31 or November 30, respective of certification level, documents do not support the education claimed, or documents do not meet the criteria outlined in the *Accepted Education & Documentation Policy*, the audit is considered unsuccessful. The individual lapses on their current expiration date.

*Note:* In lieu of submission of proof of education, an eligible individual may successfully complete and pass the recertification by examination if they meet qualifications in section Recertification by Examination, above. The audited individual must contact National Registry with their decision to recertify by examination. If the examination attempt is unsuccessful or examination is not taken prior to the current expiration date, the individual lapses on their current expiration date.

Level 3: Audit Due to Cause – National Registry can generate an audit for investigative purposes for an application within a current recertification cycle or submitted within the previous five years. Once audited, an individual has 30 days from the time of initial notification of the audit status to submit complete documentation or proof of education for all education claimed on the recertification application being audited.

• If an individual does not respond within 30 days from the date of the initial notification of the audit status with complete documentation or provides incomplete documentation, the audit is

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considered unsuccessful. An unsuccessful or Non-Compliant audit may result in disciplinary action up to and including revocation as outlined under the *Disciplinary Actions Policy*.

### Rationale

Audits ensure requirements for recertification are met as a means of assessing continued competency and upholding the mission of the National Registry in protecting the public. Audits are a requirement of certification accreditation standards.

# **Related Policies and Procedures**

Disciplinary Action Accepted Education & Documentation Policy Academic Credit Policy Certification Scheme – NREMR Certification Scheme – NREMT Certification Scheme – NRAEMT Certification Scheme – NRP

# References

International Organization for Standardization (ISO). (2015). *Conformity Assessment – General requirements for bodies operating certification of persons* (ISO/IEC 17024:2012(E)). Institute for Credentialing Excellence (I.C.E).

International Organization for Standardization (ISO). (2015). *Quality management systems – Requirements*. (ISO 9001:2015(E)).

# **Document History**

2021-04-08	Created
2021-06-09	Approved by the National Registry Board of Directors for Public Comment (v1)
2021-09-21	Ratified by the National Registry Board of Directors in Special Meeting (v1)
2021-12-01	Recertification Policies – Ratified Sept 2021 BOD Project Charter initiated and supported
	as a strategic initiative due to evaluation of public comment response and
	organizational determination to delay the policy implementation date from 4/1/2022 to
	4/1/2023. Delay documented in Recert Policies Ratified June 2021 BOD Meeting Project.