Statement of Deficiencies	**(X1) Provider/Supplier/CLIA Identification Number**	**(X3) Date Survey Completed**
	03P001	05/21/2026
Name of Provider or Supplier	**Street Address, City, State**	
Donor Network Of Arizona	2010 West Rio Salado Parkway, Tempe, AZ	

For information on the provider's plan to correct this deficiency, please contact the provider or the state survey agency.

(X4) ID Prefix Tag	**Summary Statement of Deficiencies** (Each deficiency should be preceded by full regulatory or LSC identifying information)
Z0118	QUALIFICATIONS CFR(s): 486.326(a) (1) The OPO must ensure that all individuals who provide services and/or supervise services, including services furnished under contract or arrangement, are qualified to provide or supervise the services. This STANDARD is not met as evidenced by: Based on interview and record review the agency failed to ensure all individuals providing services are qualified to provide the services in 3 out of 8 staff (DLA9, ORL13, and ROC16) personnel records reviewed. The failed practice can lead to a breakdown in the integrity of the organ and tissue donor process and lead to poor organ and tissue outcomes. Findings include: Record review of policy titled CO-HR01 STAFFING PROCESS with an effective date of 04/20/2026 states on page 6-7, procedure 6.5.3.2. Resume and/or application review - A scan of applicant submitted documents to determine if they are likely to meet minimum qualifications. 6.7.3 Background checks shall include educational and other professional credentials, job history check 6.7.3.1 Information that is significant and clearly different from the candidates application, resume, identify, and/or other information provided during the selection process that was dishonest will disqualify the contingent new hire from continuing in the hiring process The policy does not mention that the minimum qualifications will be verified against the background check information, nor does it mention what equivalent experience would qualify.

Record review of job description titled: Donation and Family Advocate I, II, III with a revised date of 04/03/2025 states on page 4 under header Position Qualifications and Specifications Minimum Education Bachelors Degree or equivalent experience.

Record review of DLA9 (Donor Legacy Advocate II) personnel records revealed that DLA9 stated on his resume that he had a bachelors degree, but there was no proof that the bachelors degree was verified by the agency prior to being employed as a Donation and Family Advocate I, II, III

Record review of DLA9 Universal Background Screening revealed there was no section of the background check labeled Education Verification.

Record review of job description titled: Organ Referral Liaison with a revised date of 3 /9/2026 states on page 4 under header Position Qualifications and Specifications Minimum Education: Associate degree, bachelors degree or relevant medical certification.

Record review of ORL13 (Organ Referral Liaison II) personnel records revealed ORL13 stated on her resume that she had a masters degree, but there was no proof that the masters degree was verified by the agency prior to being employed as an Organ Referral Liaison.

Record review of ORL13 Universal Background Screening revealed there was no section of the background check labeled Education Verification.

Record review of job description titled: Referral Optimization Charge with a revised date of 3/9/2026 states on page 4 under header Position Qualifications and Specifications Minimum Education: Associate degree or higher in nursing, respiratory therapy, paramedic medicine, related biological science (including transplant and donation science).

Record review of ROC16 (Referral Optimization Charge) personnel records revealed ROC16 stated on her resume that she had a bachelors degree, but there was no proof that the bachelors degree was verified by the agency prior to being employed as a Referral Optimization Charge.

Record review of ROC16 Universal Background Screening revealed there was no section of the background check labeled Education Verification.

In an interview on May 21, 2026, at approximately 8:45am with VPTC22 (Vice President, Talent & Culture) when asked if the education degrees were verified prior to being employed in the position, VPTC22 stated that if the degree was not in the background check, then the experience may have qualified them for the position. When asked what experience would qualify these applicants for the positions, VPTC22 stated that there is no guideline set for that, they rely on the departments to make that determination because they are the experts on that matter.