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**Members Of:**

*American Institute of Certified Public Accountants (AICPA)*

*American Academy of Medical Administration*

*American Association of Healthcare Consultants*

*Association of Certified Fraud Examiners*

*National Association of Tax Professionals*

*American Academy of Financial Management*

*National Society of Accountants*

*California Tax Education Counsel (CTEC)*

# VisionQwest Healthcare

TO: All Employees  
FROM: Michael L. Lodge  
President & CEO  
DATE: January 1, 2009  
SUBJECT: BACKGROUND CHECK POLICY

Background Checks

Revised September 3, 2009

Changes indicated in red font.

## Employees covered by this policy

This policy applies to all employees of VisionQwest.

### A. Purpose

1. It is important that the company's business missions are supported by qualified employees, with a safe and secure environment for all VisionQwest client facilities, including patients, visitors and employees. It is also important that VisionQwest take meaningful actions to protect its core business and clients of the company.
2. This policy is intended to support the verification of credentials, criminal history, credit status and other information related to employment decisions that assist the company in meeting its commitments.

### B. Statement of General Policy

1. It is the policy of VisionQwest that all new Staff and specified new employees have certain credentials and criminal and other background information verified as a condition of employment.
2. It is the policy of VisionQwest that specified current healthcare and staff employees with medical and fiscal management have their

criminal and other background information verified as a condition of continued employment.

### **C. Definitions**

1. "Credit history check" means checking the credit history of the selected applicant or employee. (Federal laws prohibit discrimination against an applicant or employee as a result of bankruptcy.)
2. "Criminal history check" means verifying that the selected applicant or employee does not have any undisclosed criminal history in every jurisdiction where the applicant or employee currently resides or has resided.
3. "Educational verification" means ensuring that the selected applicant or employee possesses all educational credentials beyond high school listed on the application, resume or cover letter or otherwise cited by the candidate that qualify the individual for the position sought.
4. "Employee" is defined as any person employed by VisionQwest, whether full- or part-time, and per diem.
5. "Employment verification" means ensuring that the selected applicant or employee actually worked in the positions listed on the application, resume, or cover letter or otherwise cited by the candidate that qualify the individual for the position sought, as well as all employment during a period of at least seven (7) years immediately preceding application at VisionQwest. This verification should include dates of employment and reasons for leaving each position.
6. "License verification" means ensuring that the selected applicant or employee possesses all the licenses listed on the application, resume or cover letter or otherwise cited by the candidate that qualify the individual for the position sought and verification of any professional license required for the position, including verification of the disposition of such licenses. This includes any motor vehicle drivers licenses required for the associated position.
7. "Criminal history check" means verifying that the selected applicant or employee does not have any undisclosed criminal history in the jurisdiction where the applicant or employee currently resides, or where the applicant or employee last resided, if the applicant or employee only recently moved to a location near the company and or its clients. The criminal check is checked through a national federal and state data base.
8. "Sex and violent offender registry check" means verifying that the selected applicant or employee does not have undisclosed convictions of certain sex and violent crimes in the jurisdiction where the applicant or employee currently resides, or where the applicant or employee last resided, if the applicant or employee only recently moved to a location near the Company or its clients. The sex and violent offender registry check is through a national federal and state data base.
9. "Sex and violent offender registry check" means verifying that the selected applicant or employee does not have undisclosed convictions of certain sex and violent crimes in every jurisdiction where the applicant or employee currently or has resided.

10. "Tax payment check" means verifying that the selected applicant or employee is current in payment of federal and state taxes.
11. "Social Security check" means verifying through the social security administration, department of homeland security the validity of the number associated with the applicant or employee.
12. "Work Authorization Granted by USCIS" means verifying through an authorized USCIS work authorization card and any Green Card status granted by USCIS.

#### **D. Policy Provisions**

1. New Staff Employees
  - a. All new Staff employees shall have the following background checks completed as a condition of employment with VisionQwest. For each of the background checks identified in this paragraph, the human resources office at each campus will determine whether it or the hiring department will perform the background check.
    - i. Employment verification - to be completed by the company staffing coordinator(s)
    - ii. Educational verification - to be completed by the company staffing coordinator(s)
    - iii. License verification - to be completed by the company risk manager or staffing coordinator(s); except for a required motor vehicle drivers license, which is to be initiated by the hiring department or campus human resources office and completed by Risk Management
    - iv. Criminal history check - to be initiated by the staffing coordinator or risk manager, with final completion by the risk manger.
    - v. Sex and violent offender registry check - to be initiated by the hiring department or campus human resources office, with final completion by the campus human resources office.
    - vi. Social Security – to be completed by the company staffing coordinator or risk manager.
  - b. Foreign nationals who have been offered employment into appointed Staff positions will be subject to the following provisions:
    - i. The verification of education that the candidate has cited that qualifies the individual for the position.
    - ii. The verification of employment that the candidate has cited that qualifies the individual for the position.
    - iii. A criminal history check covering time in the United States if the period of time that the individual has been in the United States exceeds one year.
    - iv. A criminal history check in the individual's prior countries of residence only if the individual's visa and/or authorization to work in the United States was issued before implementation of the Patriot Act on October 24, 2001. The university will not require that a criminal history check be conducted in the individual's

prior countries of residence if the visa or authorization to work was issued or renewed under the provisions of the Patriot Act.

- c. All new Staff employees who will be performing any of the following jobs shall also have the below listed additional background checks completed as a condition of employment with VisionQwest: President, Vice President, Staffing Coordinators, Management Accounting, Accountants, Medical Billing, Staffing Coordinators, DONs and other positions as requested by the company background checks shall include:
    - i. Credit history check - to be completed by Risk Management
    - ii. Tax payment check - to be completed by Risk Management
2. New Hourly and Per Diem Employees (including individuals with student status)
- a. All new Hourly employees who are 22 or older and who are hired to perform work indicated below ([D.2.d. and e.](#)) shall have the following background check completed as a condition of employment with VisionQwest:
    - . Criminal history check - to be initiated by the Staffing Coordinator or Risk Management office
    - i. Sex and violent offender registry check - to be initiated by the Staffing Coordinator or Risk Manager office
  - b. All new Hourly or Per Diem employees who are at least age 18 but less than 22 and who are hired to perform work indicated below ([D.2.d. and e.](#)) shall have the following background check completed as a condition of employment with VisionQwest. Criminal background checks are not performed on individuals who are under the age of 18.
    - . Limited Criminal history check - to be initiated by the Staffing Coordinator, with final completion by the Risk Manager.
    - i. Limited sex and violent offender registry check - to be initiated by the Staffing Coordinator, with final completion by the Risk Manager.
  - c. Foreign nationals who have been offered employment into Hourly or Per Diem positions performing the type of work covered elsewhere in this policy will be subject to the following provisions:
    - . A criminal history check covering time in the United States if the period of time that the individual has been in the United States exceeds one year.
    - i. A criminal history check in the individual's prior countries of residence only if the individual's visa and/or authorization to work in the United States was issued before implementation of the Patriot Act on October 24, 2001. The university will not require that a criminal history check be conducted in the individual's prior countries of residence if the visa or authorization to work was issued or renewed under the provisions of the Patriot Act.
  - d. Hourly work assignments that require this background check include:
    - . Employment in a Staff, Part-Time, Per-Diem -covered position

- i. Work that involves handling financial, medical billing or facility patient records.
    - ii. Work that involves any confidential or sensitive data or information
    - iii. Work that involves handling cash, checks, or credit card transactions
    - iv. Work that involves the passing of medication or other controlled substances as it relates to the duties of patient care
    - v. Work that involves responsibility for or providing services to any one under the age of 18
    - vi. Work that involves possessing keys/codes or other means of entry to living spaces within VisionQwest, its client facilities, or any medication storage units or areas.
    - vii. Work that provides access to a select agent or toxin as defined by the Centers for Disease Control (CDC) or which will load, unload, prepare for transport, transport, or offer for transportation any quantity of radioactive materials or a quantity of hazardous material which requires placards
    - viii. Any other Hourly or Per Diem positions that a VisionQwest administration determines should be included
  - e. All new Hourly and Per Diem employees who are hired to perform work that requires a license, regardless of age, shall have the following background check completed as a condition of employment with VisionQwest:
    - . License verification - to be completed by the hiring department; except for a required professional license or motor vehicle drivers license, which is to be initiated by the Staffing Coordinator and completed by Risk Management
  - f. At the discretion of the Staffing Coordinator or Risk Management, an Hourly or Per Diem employee may have the following completed:
    - . an educational verification and/or employment verification
      - i. a full criminal history check
3. Current Staff Employees
- a. All current Staff employees who are performing any of the following jobs or functions shall have the below listed background checks completed as a condition of continued employment with VisionQwest: President, Vice President, Management Accounting, Accountant, Staffing Coordinator, DON.
    - . SS/Criminal history check - to be completed by Risk Manager
      - i. Credit history check - to be completed by Risk Manager
      - ii. Tax payment check - to be completed by Risk Manager
4. Previous Verifications or History Checks
- a. If the VisionQwest has performed any of the above verification or history checks on an individual within the past year, a new verification or history check of that specific category will not be required. The results of the previously performed verification and/or history check will be considered in any pending employment decision.

## **E. Responsibilities**

1. VisionQwest Staffing Coordinators and Risk Manager Responsibilities
  - a. The President's office will determine which of the components of the background check that it, the Staffing Coordinator or the Risk Manager will perform.
  - b. All offers of employment, oral and written, shall include the following statement: "This offer is contingent on the VisionQwest verification of credentials and other information required by state law and company policies, including the completion of a criminal history check."
  - c. Employment verification: It is strongly recommended that this verification be completed before making an offer of employment to any individual; in all cases requiring such, this verification shall be completed within 30 days of making the offer of employment.
  - d. Educational and License verifications: It is strongly recommended that this verification be completed before making an offer of employment to any individual; in all cases requiring such, these verifications shall be completed within 30 days of making the offer of employment.
  - e. Criminal history check (standard or limited) and sex and violent offender registry check (standard or limited): In all cases requiring such, these background checks shall be initiated after acceptance of the conditional offer of employment.
    - i. The individual's official name, date of birth and social security number will be obtained from the person and provided to a third-party which VisionQwest has contracted with for associated services.
  - f. If the criminal history check indicates that there are no convictions, the third party vendor will inform the initiator of the request who in turn will inform the applicant that the employment offer is confirmed.
  - g. If the criminal history check indicates that there are convictions, the third party vendor will inform the Staffing Coordinator and Risk Management. The Staffing Coordinator will provide a copy of the report to the individual. (All related information will be treated as confidential, and protected as such.)
  - h. If the criminal history check reveals convictions which the individual disclosed in the application, the Staffing Coordinator or Risk Manager will review the report jointly. Jointly, they will evaluate each conviction, including any additional information that the individual provides, before the offer of employment is confirmed or withdrawn. The existence of a conviction does not automatically disqualify an individual from employment. Relevant considerations may include, but are not limited to, the nature and number of the convictions, their dates, and the relationship that a conviction has to the duties and responsibilities of the position. Any decision to accept or reject an individual with a conviction is solely

- at the discretion of VisionQwest. (All related information will be treated as confidential, and protected as such.)
- i. If unreported convictions are revealed in the criminal history check, the offer of employment will be withdrawn and, if employed, the individual will be separated from employment, unless the individual shows that the report is in error. The decision to reject or terminate an individual with an unreported conviction is solely at the discretion of VisionQwest. (All related information will be treated as confidential, and protected as such.)
  - j. In the event that the results of the background check influences a decision to withdraw an employment offer or terminate employment, the Risk Manager will inform the assigned Staffing Coordinator and the individual.
  - k. For all employment, education, and license checks/verifications required, departments shall maintain records indicating the item checked/verified, the name of the Staffing Coordinator or Risk Manager completing the check/verification, the date of the check/verification, and the status of the check/verification. These records shall be retained in the VisionQwest personnel file for the associated employee.
    - i. All results of criminal and sex and violent offenders convictions or issues are considered confidential and will be maintained in confidential files within the VisionQwest office.
2. VisionQwest Risk Management Responsibilities
- a. In the event that a criminal conviction is found, the third party vendor will submit the report to the Risk Manager.
  - b. VisionQwest Risk Management will monitor the hiring decisions made in such cases, consult with the Staffing Coordinator in helping to resolve cases, and monitor hiring decisions in such cases for consistency.
  - c. VisionQwest Risk Management will conduct criminal, credit and tax history background checks for Staff employees in the following positions: President, Vice President, Management Accountant, Accountant, Staffing Coordinator, DONs, and all other hired professional. (All related information will be treated as confidential, and protected as such.)
  - d. VisionQwest Risk Management will coordinate the receipt and payment of the third party vendor's fees.
3. VisionQwest will be responsible for any fees associated with any of the components of the background check process.

## **F. Sanctions for Violation**

Violations of VisionQwest policies, Codes of Conduct, including providing false or misleading information used for any of the above background checks, will be handled in accordance with applicable VisionQwest policies and procedures; which may include disciplinary actions up to and including termination from VisionQwest

## **G. Appeals**

1. In accordance with Section D.3.b. of this policy, an offer to a current Staff employee for a position that the Risk Manager has identified as having revenue processing responsibilities, medical or patient information, passing of medication is conditional until completion and review of the criminal history check. If the offer is withdrawn as the result of a background check or if the Staff or Healthcare employee is terminated as the result of an unreported conviction, the employee may appeal the withdrawal of the offer or the termination pursuant to the company's problem-grievance procedures.
2. For new hires and current Hourly and Per Diem employees, the withdrawal of an offer of employment based on the result of a background check may be appealed to the next higher head for review but the decision is not subject to the VisionQwest's problem-grievance procedures.

## **H. Code of Conduct / Employee Handbook**

1. VisionQwest Employee Manual has a complete code of conduct that must be adhered to by all employees. The code of conduct plays a vital role in the day to day operation of the company, the employees performance, and the professional outreach of the company. Violation of the Employee Handbook as it relates to all parts of the Handbook and the Code of Conduct will result in suspension or termination of employment with VisionQwest. Any illegal activity or violation of the Employee Handbook will result in suspension or immediate termination.

## **Full Background Check Procedure**

1. VisionQwest has developed a full employee check list that covers all aspects of documentation and full background check procedures.

**EMPLOYEE INFORMATION**

Name:

Start date:

Hire Rate:

Position:

Manager:

**FIRST MEETING**

- Employment Application (Include all duties)
- Provide Copy Of Employment Contract
- Provide Copy Of Attorney Questions (petitioned nurses)
- Sign Contract / Date: \_\_\_\_\_
- Submitted Date: \_\_\_\_\_

**EMPLOYMENT DOCUMENTATION**

**HR CHECK LIST**

- Review Immigration Docs
- File I-140  
Date: \_\_\_\_\_
- I-512L, Author for Parole  
Date: \_\_\_\_\_
- Work Authority  
Date: \_\_\_\_\_



**WORK DOCUMENTATION**

- I-9
- US W-4
- Copy of Drivers License
- Copy of Social Security Card
- Employment Eligibility Verification
- Copy of RN / LVN / CNA License
- Copy of License Verification Through State Web Site
- Copy of OT / PT License
- Copy of BLS
- Copy of ACLS/PALS/NRP if applicable
- Copy of Nursing Insurance
- Copy of Immune Record (proof of MMR)
- Employee ID (1 for employee / 1 file)
- Copy of TB (PPD Skin Test)

**BACKGROUND CHECK**

- Criminal Background Check
- Social Security Check
- Signed Background Check Release
- HHS / OIG
- General Services Administration
- Background Cleared \_\_\_\_\_
- Not Cleared
  
- Documents Reviewed and Complete  
\_\_\_\_\_

	within 1 yr.	
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**HUMAN RESOURCE DOCUMENTATION**

<input type="checkbox"/> Documents Reviewed and Complete	<input type="checkbox"/> Resume <input type="checkbox"/> Complete Application <input type="checkbox"/> Clinical Competencies Skills Checklist <input type="checkbox"/> References Date Called: ____ <input type="checkbox"/> Current ACLS <input type="checkbox"/> Current CPR <input type="checkbox"/> Certificate of Insurance (Professional Liability) <input type="checkbox"/> Signed Employee Manual	<input type="checkbox"/> Request for Employment Verification <input type="checkbox"/> Employee Manual Body Mechanics Dress Code Telephone Courtesy Disciplinary Action Substance Abuse Sexual and Other Un-lawful Harassment Resolution of Complaints Clinical Incidents & Sentinel Events Work Related Injuries and/or Exposures Orientation Earthquake / Disaster Preparedness Life Safety (Fire) Management Environmental Safety Infection Control: Universal/Blood Borne Cultural Sensitivity Patients Rights Suspected Abuse Restraints 2009 National Patient Safety Goals
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**INTRODUCTIONS AND TOURS**

Give introductions to department staff and key personnel during tour.

Tour of facility, including:

- Restrooms
- Mail rooms
- Copy centers
- Fax machines

- Bulletin board
- Parking
- Printers
- Office supplies

- Kitchen
- Coffee/vending machines
- Cafeteria
- Emergency exits and supplies

**POSITION INFORMATION**

Introductions to team.

Review initial job assignments and training plans.

Review job description and performance expectations and standards.

Review job schedule and hours.

Review payroll timing, time cards (if applicable), and policies and procedures.