

Title: EMPLOYMENT BACKGROUND CHECKS AND CLEARANCES – HUMAN RESOURCES	
Joint Commission Chapter Section: 4.0 Human Resources	Date ORIGINAL policy was created: 03/01/2006
This policy belongs to: Human Resources	
Committee/Council Approval(s): N/A	Date of COMMITTEE Approval(s): N/A

This Policy contains one or more PROCEDURES outlining the methods and applicability of this Policy.

This policy applies to the following Geisinger Entities:

CLINICAL ENTITIES (includes Geisinger entities providing health care services, i.e., hospitals, group practices, clinics)	
<input checked="" type="checkbox"/> Community Medical Center (CMC or GCMC)	<input checked="" type="checkbox"/> Geisinger Jersey Shore Hospital (GJSH)
<input checked="" type="checkbox"/> Endoscopy Center of Geisinger Lewistown Hospital; an entity of GLH	<input checked="" type="checkbox"/> Geisinger Lewistown Hospital (GLH)
<input checked="" type="checkbox"/> Family Health Associates of GLH (FHA)	<input checked="" type="checkbox"/> Geisinger Medical Center (GMC)
<input checked="" type="checkbox"/> Geisinger Bloomsburg Hospital (GBH)	<input checked="" type="checkbox"/> Geisinger Medical Center Muncy (GMCM)
<input checked="" type="checkbox"/> Geisinger Clinic (GC)	<input checked="" type="checkbox"/> Geisinger Pharmacy, LLC
<input checked="" type="checkbox"/> Geisinger Community Health Services (GCHS)	<input checked="" type="checkbox"/> Geisinger Wyoming Valley Medical Center (GWV)
<input type="checkbox"/> Geisinger Encompass Health, LLC	<input checked="" type="checkbox"/> GMC Outpatient Surgery - Woodbine; an entity of GMC
<input checked="" type="checkbox"/> Geisinger Endoscopy-Montoursville; an entity of G-HM	<input type="checkbox"/> Lewistown Ambulatory Care Corporation (LACC)
<input checked="" type="checkbox"/> Geisinger Gray's Woods Outpatient Surgery and Endoscopy Center; an entity of GC	<input checked="" type="checkbox"/> Marworth
<input type="checkbox"/> Geisinger-HM Joint Venture (G-HM) ¹	<input type="checkbox"/> West Shore Advanced Life Support Services, Inc. (WSALS or Geisinger EMS)

NON-CLINICAL ENTITIES (includes Geisinger business/corporate entities not providing health care services)	
<input checked="" type="checkbox"/> Geisinger Commonwealth School of Medicine (GCSOM)	<input checked="" type="checkbox"/> Geisinger System Services (GSS)
<input type="checkbox"/> Geisinger Health (GH or GHF)	<input type="checkbox"/> GNJ Physicians Group (GNJ)
<input checked="" type="checkbox"/> Geisinger Health Plan (GHP)	<input checked="" type="checkbox"/> ISS Solutions, Inc. (ISS)
<input type="checkbox"/> Geisinger Quality Options, Inc. (GQO)	<input type="checkbox"/> Keystone Health Information Exchange, Inc. (KeyHIE)

PURPOSE

In accordance with Geisinger's commitment to protecting the well-being of all patients, members, employees, students, and visitors, we have agreed to take steps to ensure that our team members have successfully completed a rigorous process of background checks and health screenings. This helps to promote safety and minimize the possibility of hiring someone who might cause harm to our patients or business operations.

PERSONS AFFECTED

All employees and volunteers

¹ Geisinger-HM Joint Venture is an LLC representing a joint venture between Geisinger Medical Center and Highmark Health.

POLICY

Geisinger utilizes multiple types of pre-employment background checking for clinical and non-clinical personnel as stated below. Geisinger requires that offers of employment include the condition that the applicant submit to and successfully pass the following checks prior to their start date:

1. Drug Screen
2. Nicotine Screen
3. Health Screen
4. Criminal Background Check (includes PATCH - Pennsylvania Access to Criminal History, and OIG Sanction Screenings)

Criminal Background Checks

All prospective employees will require a Criminal Background Check (including PATCH and OIG Sanction Screenings). In addition, prospective employees working in jobs with direct, hands-on patient care or in other designated positions will also require the following clearances:

1. Child Abuse History Clearance (CAC)
2. FBI Fingerprint Background Check

Geisinger requires prospective employees to obtain new CAC and FBI Fingerprint Background Check clearances, unless the individual can provide clearances obtained for other employment purposes that are dated within 4 years of their Geisinger employment start date. When clearances are provided from the prospective employee under these circumstances, they will be required to sign an affirmation letter indicating there are no changes to the clearance status. Geisinger will generate a new PATCH Clearance on every prospective employee. Prospective employees requiring the CAC and FBI Fingerprint Background Check may have the option to be hired provisionally. See the Provisional Hires section of the policy below.

Prospective employees hired to work for the Geisinger LIFE Adult Day Care department who have not been a resident of the Commonwealth of Pennsylvania for two years (without interruption) immediately preceding the date of application for employment will also need to obtain an FBI Fingerprint Criminal History Check through the PA Department of Aging.

Clinical contingent worker staff, contingent worker staff residents, locum tenens and students are required meet requirements of this policy and as requested, provide proof of completed clearances. Required clearances must be completed within the timeframe as directed by Human Resources and as a condition of placement to work at a Geisinger location.

An individual transitioning from a contingent worker to an employee of Geisinger will be onboarded consistent with the new hire process.

If a prospective employee or volunteer is arrested for or convicted of an offense that would constitute grounds for denying employment or participation in a program, activity, or service or is named as a perpetrator in a founded or indicated report, the prospective employee or volunteer shall provide Human Resources with written notice not later than 72 hours after the arrest, conviction, or notification that the person has been listed as a perpetrator in the Statewide database.

Policy versions prior to May 15, 2019, may be requested by contacting Geisinger Quality & Safety.

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If Human Resources has reasonable belief that a prospective employee or volunteer was arrested for or convicted of an offense that would constitute grounds for denying employment or participation in a program, activity or service, or is named as a perpetrator in a founded or indicated report, or the prospective employee or volunteer has provided notice as required under this section, the person responsible for employment decisions or administrator of a program, activity or service shall immediately require the prospective employee or volunteer to submit current information as required.

Education requirements, as documented in the job profile, are primarily verified by our 3rd party vendor for background checks. In the event the vendor is unable to complete the verification, Geisinger will independently obtain documentation (i.e. diploma, transcript, etc.) from the prospective employee to verify the education requirement was satisfied. In situations where documentation cannot be provided, research and efforts will be documented to validate the facts and circumstances (i.e. school closing, no diploma in possession), when this occurs approval by an HR Manager or above will be required to proceed.

Transfers and Additional Jobs

Current employees who transfer to, or who obtain an additional job in another Geisinger position that includes direct, hands-on patient care or are in other designated positions must complete the PATCH, the CAC and the FBI Fingerprint Clearance. At the direction of Human Resources leadership, Geisinger may temporarily waive the requirement for transferring internal employees to obtain clearances due to urgent and critical staffing demands specific to voluntary or involuntary reassignment of staff for immediate patient care staffing. Employee will be required to sign an attestation that will be placed on file in the HR system in place of employment clearance and educational verification process completion.

If an employee has all clearances on file that are dated within the last 5 years, clearances will not need to be regenerated upon transfer.

Employees who obtained these clearances for other employment purposes can provide the clearance copies to satisfy this requirement if they are dated within 4 years of the transfer date; an affirmation letter must also be signed, to acknowledge there has been no change in clearance status.

Displaced Employees

If a former displaced employee accepts a position with Geisinger during the Severance Payment Period, this will be recognized as a transfer and the current transfer policy will be followed. If a former displaced employee accepts a position with Geisinger once the Severance Payment Period has exhausted, all appropriate clearances, background checks and drug screenings will need to be completed and the process will be considered a re-hire.

Results Process:

Human Resources will follow up on all clearance document findings reported and will make determinations regarding future Geisinger employment for applicants whose results indicate a finding of concern. When

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necessary, an internal committee will review to make determinations regarding ability to begin employee/transfer into the new role. If the clearance or screening results dictate an offer of employment will be withdrawn, the Recruiter will notify the candidate directly.

Appeal Process:

Candidates with a background check finding of concern may contact their Recruiter for guidance on how to contact the appropriate administering body to dispute the results.

Provisional Hires

It is Geisinger's standard practice to allow all prospective employees and internal candidates requiring the clearance listed below to be hired provisionally if they have satisfactorily met all other requirements with no records of concern. This means they can begin employment while the below additional clearance is still in progress, but the clearance must be completed, and a copy of the final clearance must be received by Human Resources within 45 days of the date of hire. If the clearance is not received within 45 days the date of hire, the employee will be suspended.

1. Child Abuse and Pennsylvania Access to Criminal History (PATCH) Reports must be applied for and results returned with no record of concerns.
2. FBI Fingerprint Background Check
 - Candidate must submit a photo/scan of their fingerprint appointment **receipt** from Identogo to their HR Operations Coordinator. The coordinator will not accept a photo of appointment registration.
 - Candidate must sign an affidavit, provided by HR, stating they have no records of concern that are outlined on the form.
 - If the candidate's coordinator does not receive the fingerprint appointment receipt and the signed affidavit, the candidate is **not** eligible for provisional hire.
 - The candidate will receive the clearance via mail and must submit a photo, or scan of all pages of the clearance to Human Resources.

In addition, the employee's manager must ensure that during the provisional period, the employee is not permitted to work alone with children and must always work within the immediate vicinity of a permanent employee.

Human Resources will regularly follow-up with the employee and their manager to ensure the expectations are met.

RECERTIFICATIONS:

PURPOSE:

In accordance with Geisinger's commitment to protecting the well-being of patients, the following policy documents the steps in place to address recurring background clearance requirements.

POLICY AND PERSONS AFFECTED:

Effective July 1, 2015, and forward, all current employees who are working in a job providing direct, hands-on

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patient care or are in other designated positions will be required to renew their Pennsylvania Access to Criminal History Report (PATCH), Pennsylvania Child Abuse History Clearance (CAC) and FBI Fingerprint Background Check every five (5) years. Human Resources will assign mandatory due dates for document submission. Employees will be required to submit recertification documents for the PATCH, CAC, and FBI Fingerprint clearances prior to the 5-year document expiration date, unless granted an emergency exception by Human Resources or the Chief Medical Officer. Employees may be subject to disciplinary action up to and including termination for non-compliance to the deadline assigned by Human Resources.

If an employee or volunteer is arrested for or convicted of an offense that would constitute grounds for denying employment or participation in a program, activity or service, or is named as a perpetrator in a founded or indicated report, the employee or volunteer shall provide Human Resources with written notice no later than 72 hours after the arrest, conviction or notification that the person has been listed as a perpetrator in the Statewide database.

If Human Resources has reasonable belief that an employee or volunteer was arrested or convicted of an offense that would constitute grounds for denying employment or participation in a program, activity or service, or is named as a perpetrator in a founded or indicated report, or the employee or volunteer has provided notice as required under this section, the person responsible for employment decisions or administrator of a program, activity or service shall immediately require the employee or volunteer to submit current information as required.

Notification Process:

The following steps will be performed to ensure recertifications are performed timely:

- Human Resources will identify and notify employees when they are required to begin the recertification process.
- Human Resources will assign due dates for document submission which will require employees to submit their documents prior to the expiration date of the current clearance(s) on file.
- Employees must obtain all the above referenced clearances within the timeframe as assigned by Human Resources
 - o Employees who obtained these clearances for other employment purposes can provide the clearance copies to satisfy this requirement if they are dated within 4 years of the notification date; an affirmation letter must also be signed, to acknowledge there has been no change in clearance results.

Results Process:

Human Resources will notify the employee of a finding of a concern and next steps. When necessary, an internal committee will review to make determinations regarding continued employment for current employees whose results indicate they should not continue employment in their current role with Geisinger.

If termination is warranted, the Employee Relations Specialist will communicate with Management regarding the employment decision.

Appeal Process:

Employees with a finding on any of their background check materials may contact their Employee Relations

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Specialist for further information and the appropriate administering body to dispute the results as they desire.

Consequences of Non-Compliance:

Employees must complete and submit all required clearances by the due date assigned by Human Resources. If the actual clearance has not been provided by the due date assigned by Human Resources, the employee may be subject to disciplinary action up to and including termination even if the current clearance on file has not yet expired.

Sanctions Screenings:

Geisinger screens employees, during pre-hire and monthly thereafter, to determine if they have been excluded from participation in federal health care programs, such as Medicare, Medicaid, etc. Geisinger does not knowingly employ or contract with individuals or organizations that are ineligible to perform work related directly or indirectly to federal health care programs

DEFINITIONS

Background Check: Done through a third-party vendor (Certiphi) and includes the last seven (7) years of residence and county, state, and criminal history.

ChildLine: An organization that accepts calls from the public and professional sources 24 hours per day, seven days per week supporting those who have been abused and compiling a list of those who have been accused of abusing children.

CY113: The online form necessary to be completed for the Pennsylvania Child Abuse History Clearance to take place.

Department of Aging: Responsible for the administration of all Aging programs and services for the commonwealth.

Department of Human Services: Administer services that provide care and support to Pennsylvania's most vulnerable citizens.

Finding: Refers to a concerning result of a background check clearance document that requires additional review before an individual's ability to be employed/learning/volunteering in a Geisinger location.

FBI Fingerprint-based background check: Fingerprint based, nationwide criminal records check.

Geisinger: Refers to the entire Health Care System comprised of Geisinger as parent and all subsidiary corporate entities comprising the Health Care System.

New Hire: Individual who is new to the system, either who never worked for the organization or who had a break in service and is returning to the organization.

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Contingent Worker: Individual who is not employed by Geisinger but is placed/assigned to Geisinger to provide services

PATCH: Pennsylvania Access to Criminal History ' State Police Criminal History report (included in the background check for new hires)

Prospective Employee: Any candidate who has accepted a job offer but has not yet begun employment.

Transfer Employee: Individuals who are currently employed by Geisinger, transferring to another position within the system.

Volunteer: A person who is unpaid and volunteers their time to Geisinger.

NICOTINE SCREENING: This will not be required where prohibited by state law.

PERSONAL CATEGORIES	Screening required for offers post 2/1/12 NICOTINE VIA DAU WITH HEALTH SERVICES	NO - FOLLOW TOBACCO FREE POLICY
Employees	X	
Students (Geisinger employed)	X	
Interns/Externs Paid	X	
Volunteers/Interns/Externs - Not Paid	X	
Contingent Worker		X
Contingent Worker Students,		X
Visitors/Observers		X
Per Diem Locums		X
Community Physicians		X
Out-of-State	X (unless prohibited by state law)	
Out-of-State Exempted per Legislation - List Per Legal	X But Not Reported as +	

RESPONSIBILITIES - N/A, EQUIPMENT/SUPPLIES - N/A, PROCEDURE – N/A, ATTACHMENTS - N/A, REFERENCES - N/A

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