



POLICY: Background Investigation and Reference Checks

<i>Original Implementation Date:</i>	5/27/2020	<i>Date Reviewed/ Revised:</i>		<i>Area of Responsibility:</i>	Human Resources	<i>Version:</i>	1
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PURPOSE: It is the goal of Sun Health to provide a safe environment for residents, members, team members and the community. To support this goal, all applicants to Sun Health must consent to a background investigation and reference check. This process will assist us in ensuring that to the best of our knowledge, our team members are willing to embrace Sun Health’s mission.

POLICY:

Applicants for Employment: All applicants who are offered employment with Sun Health will be subject to a background investigation. Job offers are contingent on the successful completion of a background investigation and drug test. In addition, a valid Level 1 Fingerprint Clearance Card must be provided or obtained in accordance with Sun Health policy to maintain active employment status. Other background searches such as motor vehicle or professional license verification may also be conducted as the job's critical functions require.

Background Investigation Process for Applicants: Sun Health relies on the accuracy of information obtained from employment applications, as well as the accuracy of other data presented throughout the hiring process and during employment. Any misrepresentations, falsifications, or material omissions of this information or data may result in an applicant being excluded from further consideration for employment opportunities. If an individual has already been hired, their employment may be terminated. Final applicants must complete a Permission to Obtain Information form and the hiring manager submits the form to the Human Resources Department after a contingent employment offer has been made.

The Human Resources Department will order the background check upon receipt of the signed Permission to Obtain Information form and an employment screening service will conduct the background investigation. In instances where negative or unresolved information is reported, the Human Resources Department will assess: the potential risks and liabilities related to the job's requirements, the safety of its residents and team members, and determine whether the individual should be hired. Sun Health will request criminal records related to felony and misdemeanor convictions in the past 7 years. Crimes of particular concern include, but are not limited to: crimes against persons, crimes involving weapons, crimes involving theft or fraud, and crimes involving drugs or alcohol. A designated Human Resources representative will review all results and will notify the hiring manager whether the applicant has been cleared to proceed with the hiring process.

A previous conviction does not automatically disqualify an applicant from consideration for employment with Sun Health. The applicant may still be eligible for employment with Sun Health depending on a variety of factors, including:

- The relevance of the conviction to the duties and responsibilities that would be assigned to the applicant if hired.
- The date(s) of the conviction(s).

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- The applicant's record since the date(s) of the conviction(s).

The conviction(s) may remain relevant to and be considered in any later promotion or transfer decision.

If an applicant fails to reveal any previous conviction on the Sun Health pre-employment application, they will be disqualified from employment at Sun Health because of falsification of their application. If an applicant is hired after failing to disclose a conviction, falsification of an employment application will be grounds for dismissal from employment.

If a decision not to hire an applicant is made based on the results of a background investigation, an adverse action letter will be sent by an outside vendor to the applicant informing them that they will not be hired due to the findings of the background investigation.

Background investigation information will be maintained in a file separate from a team member's personnel file and retained for a period outlined in the Sun Health Retention Period Guide.

Current Team Members: Current team members who are being considered for promotion may be subject to a background investigation as deemed necessary by Sun Health. Background investigations may also be conducted as part of an internal investigation of alleged team member misconduct.

Contractors and Staffing Agencies: Contractors and staffing agencies performing work for Sun Health are responsible for conducting background investigations on all of their employees, agents, and subcontractors that will provide services to Sun Health. Upon Sun Health's request, contractors and staffing agencies will certify that such employees, agents, and subcontractors have satisfactorily completed a background investigation.

If a contractor or staffing agency fails to satisfactorily conduct a background investigation on its employees, agents, and subcontractors, or if any negative result(s) is obtained that Sun Health determines to be disqualifying for the work to be performed, then, at Sun Health's discretion, the agreement between Sun Health and the contractor or temporary agency may be terminated.

Employment Reference Checks: Sun Health will request references from past employers, verify previous employment (past 7 years or previous two employers), along with authenticating professional certifications if related to the position they had applied for.

Information obtained during a reference check will be reviewed to determine:

- Whether false statements or material omissions were made by an individual on an application for employment or during an interview;
- Whether an applicant or team member, based on the job duties of the position in question, poses a threat to security and/or team member safety in the workplace; and
- The likelihood of an applicant or team member being successful and productive on the job.

Sun Health may verify any other information provided by an applicant that it determines is job related.

RELATED POLICIES: *Sun Health Code of Conduct and Corporate Compliance Plan; Fingerprint Clearance Cards; Employee Screening for Exclusion from Federal Healthcare Programs.*