



VERIFICATION OF CREDENTIALS AND BACKGROUND CHECKS POLICY

POLICY: It is the policy of KEYS Empowers, Inc. to verify the credentials of personnel hired and employed by the organization with the primary source of the credentials. In addition, the backgrounds of personnel will also be verified. The verification process will be done in a manner that ensures the organization's requirements for employment are met, and the integrity of our services and the persons served are not compromised.

The Human Resources Department is responsible for ensuring that the procedures in this policy are followed and met.

PROCEDURES:

a) VERIFICATION OF CREDENTIALS:

- i) All credentials required of potential employees to hold specific positions in the organization will be verified with the primary source prior to employment (with exceptions noted in d. below). Requirements of credentials will be determined through job descriptions, which identify the educational, training, credentialing, and/or licensure requirements of each position. Initial verification will occur in the areas noted below as follows:

- (1) Professional Licensure: (1) The potential employee will provide a copy of the required license to the Human Resources Department as part of the ***pre-employment process***. (2) Human Resources Department will determine the appropriate Agency to contact, based on the type of license. (3) The licensure Agency will be contacted via web site to determine if the license is current and in good standing. Human Resources Department will note the outcome of the action by completing the verification form/checklist and placing it in the employee's personnel folder. Any additional documentation sent for verification will also be placed in the personnel folder. (5) If the potential employee is in good standing, final hiring procedures will be completed. If the potential employee does not have a current license or is not in good standing with the licensing board, employment will not occur. (6) If employment is offered and accepted, a verification of license will be downloaded from the Board of Social Work Examiners (<https://mdbnc.dhmdh.md.gov/BSWEVerification/Default.aspx>) or the Board of Professional Counselors & Therapists (<https://mdbnc.dhmdh.md.gov/PCTVerification/Default.aspx>) or the Maryland Board of Physicians (<https://www.mbp.state.md.us/>).

- (a) Verification of License will be checked ***annually***.

(2) Professional Certification:

- (a) The potential employee will provide a copy of the required certification to the Human Resources Department as part of the pre-employment process.
- (b) Human Resources Department will determine the appropriate Agency to contact, based on the type of certification.
- (c) The certification Agency will be contacted via web site, phone call, or fax to determine if the



certification is current and in good standing.

- (d) Human Resources Department will note the outcome of the action by completing the verification form/checklist and placing it in the employee's personnel folder. Any additional documentation sent for verification will also be placed in the personnel folder.
- (e) If the potential employee is in good standing, final hiring procedures will be completed. If the potential employee does not have the required certification or is not in good standing with the certification board, employment will not occur.
- (f) Verification of Certification will be checked *annually*.
- (3) Education (higher education degrees): (1) Potential employees will be instructed to have the institution from which the degree was obtained send a notarized or appropriately identified transcript directly to the employer. (2) Human Resources Department will review the transcript to ensure it is a valid document and compare data contained on the document with employment requirements. (3) If the educational materials meet requirements, final hiring procedures will be completed. If they do not, the potential employee will not be hired for the position.
- (4) Exception to Education Verification Requirements: Due to the lengthy response time of most educational institutions in providing the required information, verification of education prior to active employment can be waived if the ALL of the following conditions are met: (1) A copy of the required degree is provided. (2) The employee's supervisor has been notified that verification has not occurred and this is documented in the personnel file. (3) The verification from the primary source occurs within *90 days of the first official date of employment*.
- (5) Training: If a position requires the completion of a specific training to be eligible for employment, the training will be verified *prior to the start of employment and annually* in the following manner: (1) The potential employee will provide the Human Resources Department with the original training certificate (2) If the original training certificate is not available, the employee will contact the training organization or educational institution and request that verification of training be sent to the employer (3) The employer will copy the original training certification and place copy in the employee's personnel file, or place verification materials received from outside source in personnel file.

b) BACKGROUND CHECKS

- i) Agency will ensure any individual applying for employment, whether paid or volunteer, and a contractor disqualifies the individual from the employment, the program consider:
 - (1) The age at which the individual committed the crime, the length of time since the crime occurred, and a written explanation about the circumstances that surrounded the crime.
 - (2) The punishment imposed for the crime which may include court actions regarding that punishment;
 - (3) A detailed work history that will include employment and character references; and



- (4) Any other evidence that details whether the employee, contractor, or volunteer poses a threat to the health or safety of a program participant, program staff, or a member of the public.
- ii) The program may not hire an individual as an employee, contractor, or volunteer if the program does not receive and consider the criminal history record information required under this regulation.
- iii) An individual may not be hired as an employee, contractor, or volunteer:
 - (1) If the program serves youth younger than 18 years old and the individual seeking to be hired has been convicted at any time of child abuse or child sexual abuse; or
 - (2) If the program serves youth younger than 18 years old and the individual has been convicted at any time of abuse or neglect of a vulnerable adult.
 - (3) If the criminal background investigation policy is stricter than that required by state regulations, as appropriate, to protect program participants.
- c) Agency shall:
 - i) Document the programs:
 - (1) Review of criminal history records of potential employees, contractors, and volunteers at ***hire and annually***;
 - (2) Determination regarding the impact of the criminal history on the employability of the applicant for employment and on each employee, contractor, and volunteer; and
 - (3) Will maintain documentation of the individual even if not hired or leaves employment with the program.
 - ii) Background checks will occur to ensure that the health, safety, and well-being of persons served, staff, and other stakeholders involved with services of the organization is not compromised. Background checks will be required in the following areas:
 - (1) **Criminal Checks:** A CJIS criminal background check(fingerprinting) will be done on all employees. A state and FBI data search will be completed prior to the start of employment. Additional requirements and exceptions are as follows:
 - (a) Under no circumstances will an employee be hired without a background check if working with persons served in an unsupervised role or working with children and adolescents.
 - (2) **Children and Adolescents:** All potential employees who are working with children and adolescents will be required, in addition to the CJIS criminal background check, an Adam Walsh Background Check Request will be conducted ***annually***.



- (3) **Community Based Volunteers**: All potential volunteers who are working in community based settings outside of the organization's facilities, will be required to complete a CJIS criminal background check and an Adam Walsh Background Check Request prior to working with program participants.
- (4) **Office of Inspector General Background Checks**: All KEYS Empowers, Inc. employees will be screened for Medicaid fraud *monthly* by utilizing the OIG website(<https://exclusions.oig.hhs.gov>). All findings will be kept in a binder stored in the Compliance Officer's office.
- iii) **TB Screening**: All potential employees who will be providing direct care services will be required to complete a tuberculosis screening *annually*.
- iv) **Drug Testing**: N/A
- v) **Alcohol Testing**: N/A
- vi) **Immunizations**: At the time of employment the employee will be asked to provide consent for the release of immunization records. If required, consent will be updated annually for an annual request.