BACKGROUND CHECKS

ATTACHMENTS:
1. Disclosure Statement and Authorization Form
2. A Summary of Your Rights Under the Fair Credit Reporting Act (PDF)
3. A Summary of Your Rights Under the New Jersey Fair Credit Reporting Act (PDF)

PURPOSE: To establish consistent policies for applicant screening throughout RWJBarnabas Health (RWJBH).

POLICY: It is the policy of RWJBH that any potential employee must consent to and successfully complete a background check once an offer of employment has been made, but prior to beginning employment. RWJBH may additionally conduct background checks at its discretion at any time during the course of employment.

PROCEDURE:

1. The Human Resources representative (Generalist, Recruiter or Business Partner) at each local facility is responsible for coordination and oversight of the background check process after all other pre-offer requirements have been met and a conditional offer of employment has been extended.

2. Background check components include, but are not limited to, the following:
   • Criminal history check. The criminal history information will be requested to the fullest extent permissible under governing law.
   • Sex offender check.
   • HHS/OIG and GSA screen.
   • Employment history check.
   • Reference check.
   • Education history check.
   • License and certificate verification. Primary source verification will occur annually. Employees must report any licensing/certification issue to their department director.
   • Degree verification. All positions that require a degree (including nurses) must have primary source verification done. The highest level of education completed will additionally be verified for all applicants.
   • Driver’s record check for all employees who drive vehicles owned by RWJBH or any of its affiliates. These checks must additionally be completed annually. These employees must also report any moving violations to their department director within 30 days of the final disposition.

   Additional background check components may apply based on position specific requirements.

3. All new hires should be immediately provided with a confirmation of hire letter stating that the employment offer is contingent upon successful completion of an employee health physical and a background check, including but not limited to, a reference check, criminal background check, and the OIG/GSA screen.

4. Once a conditional offer of employment has been extended to an applicant, the Disclosure Statement and Authorization Form (Attachment 1) must be provided to and completed by the applicant.
5. Upon receipt of the completed Disclosure Statement and Authorization Form, the Human Resources representative will request the selected third-party agencies and/or vendors to conduct the required background check. The Human Resources representative will additionally conduct any components of the background check that are performed internally.

6. If a criminal history is reported on an applicant’s background check, local Human Resources will consult with the management of its Security Department. All results will be reviewed on an individual basis, including but not limited to, consideration of the following factors: the nature and gravity of the offense/conduct, the time that has passed since the offense/conduct, and the nature and responsibilities of the position sought.

7. If an applicant is found to be an excluded party based on the HHS/OIG and/or GSA screen, local Human Resources will consult with its Privacy Officer.

8. If an employment offer may be rescinded based upon information contained in a background check report issued by a third-party agency and/or vendor, the Human Resources representative will provide the applicant with a copy of the third-party background check report(s), a Pre-Adverse Action Notice, and a description in writing of the applicant’s rights under the Fair Credit Reporting Act and New Jersey Fair Credit Reporting Act. The applicant will be given a reasonable period of time to provide Human Resources with any explanations, clarifications, and/or additional information in response to the report(s).

9. If an employment offer is rescinded due to results of the background check, the Human Resources representative will notify the applicant of the rescission decision in writing. If the rescission is based upon information contained in a background check report issued by a third-party agency and/or vendor, the letter will also contain any additional information required under the Fair Credit Reporting Act for an Adverse Action Notice.

CONFIDENTIALITY: Records relating to the background check process will be maintained as confidential by Human Resources and will not be disclosed to any individual except as required by law and/or to RWJBH employees/agents with a need to know.

NON-DISCRIMINATION: Information obtained as a result of the background check will be used to evaluate an applicant’s job qualifications and suitability for employment. Background check results will not be used to discriminate against an applicant on the basis of race, color, religion, creed, ancestry, affectional or sexual orientation, sex, genetic information, atypical hereditary cellular or blood trait, age, national origin, marital status (including civil union and domestic partnership status), pregnancy, disability or handicapped status, gender identity or expression, service in the United States Armed Forces, or any other trait or characteristic protected by law.

RWJBH STANDARDIZED ORIGINAL DATE: February 16, 2018
REVISED: