

NORTHCARE NETWORK

POLICY TITLE: Background Checks
POLICY EFFECTIVE DATE: June 26, 2002
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TEXT REVISIONS:

PURPOSE

To outline expectations for background checks of employees, interns, volunteers working in the NorthCare Network.

POLICY

It is the policy of NorthCare Network that all providers conduct criminal records checks on all potential employees, interns, and volunteers prior to involvement with any service or program. Criminal background checks are also to be completed periodically during employment on all employees, interns, and volunteers, and at the request of NorthCare. All employees, interns, and volunteers who may transport consumers shall have verification of their driver's license completed.

Employees and prospective employees of Pathways, d.b.a. NorthCare have background checks completed in accordance with Pathways policy.

Providers of specialty services and supports (including state plan, HSW, and alternative services) may be chosen by the beneficiary and others assisting him/her during the person-centered planning process and must also meet the staffing qualifications contained in the Medicaid Provider Manual. Providers must be in good standing with the law (i.e. not a fugitive from justice, a convicted felon, or an illegal alien).

NorthCare will not directly nor through sub-contract w/provider agencies employ or contract with persons who:

- ❖ are presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any federal department:
- ❖ have been convicted of a felony or persons who have been convicted of a misdemeanor that has a direct relationship to the duties of the position. For example: A conviction of Medicaid fraud under \$500 would exclude a person from positions which require working with Medicaid recipients.

Search results are to be printed and kept in the HR Office for potential employees, interns, and volunteers and included in their file. Notification is given to the supervisor regardless of the results. All background checks shall be reviewed according to provider's policy with appropriate action taken regarding all negative reports. If an employee has been terminated and is rehired, a new background check is done.

PROCEDURES

The following agencies/registries have websites available to determine that the new employee is eligible for employment:

- 1) State of Michigan driver's license check - Need Michigan driver's license number, or name and birth date. (An account and approval from the State is needed for this web site.)

- 2) ICHAT (Internet Criminal History Access Tool) www.michigan.gov/ichat
State of Michigan criminal background check - Need name, race, sex, birth date, social security number, and Michigan driver's license or State ID number. (An account and approval from the State is needed for this web site.)
- 3) USHHS Medicare/Medicaid OIG Exclusion List-
<http://www.oig.hhs.gov/fraud/exclusions.html>
- 4) Sanction Providers - www.michigan.gov/mdch (click on Providers/Information for Medicaid Providers/List of Sanctioned Providers)
- 5) NorthCare Network providers shall complete a Long Term Care Background check, including finger printing, on all individuals receiving an offer of employment in a position that has regular access to a consumers residing in a licensed adult foster care home operated by the CMHSP/Provider or to the consumer's property, financial information, medical records, treatment information, or any other identifying information. In addition to the OIG Exclusion and ICHAT the registries in this check include:
 - Nurse Aide Registry <http://www.prometric.com/NurseAide/MI>
 - PSOR (Public Sex Offender Registry) <http://www.mipsor.state.mi.us/>
 - OTIS (Offender Tracking Information System)
<http://www.state.mi.us/mdoc/asp/otis2.html>

REFERENCES

- ✓ 42 CFR (Balanced Budget Act of 1997), 438.610
- ✓ Public Acts, 28 and 29 of 2006
- ✓ Medicaid Provider Manual
- ✓ MDCH/PIHP Master Contract: Medicaid Managed Specialty Supports and Services Concurrent 1915(b)/(c) Waiver Program FY03-04.
- ✓ NorthCare Sanction Policy
- ✓ NorthCare Credentialing
- ✓ NorthCare Privileging Policy