

Policy

CCHMC Human Resources Policy	<i>Policy Number</i>	EMP-06
Employment (Recruitment, Hiring, and Transferring)	<i>Effective Date</i>	03/27/2023
Criminal Records and Background Checks	<i>Page</i>	1 of 2

1.0 PURPOSE

The purpose of this policy is to set forth Cincinnati Children's Hospital Medical Center's (CCHMC) background and criminal records check procedures.

2.0 POLICY

CCHMC conducts background and criminal records checks on final candidates for employment and screens employees monthly for excluded status. Applicants will not be considered for employment if they fail to disclose requested conviction information or fail to provide requested background check information. The discovery of excluded status will disqualify that individual from further employment.

3.0 DEFINITIONS

- 3.1. **Disqualifying Offense:** An Offense listed in Ohio Revised Code Section 109.572(A)(4) or other offenses deemed disqualifying by CCHMC.
- 3.2. **Background Check:** The check made by CCHMC prior to assigning a person to work, which includes fingerprinting, drug testing, education verification, and a review of the following databases: Office of Inspector General; Ohio Department of Developmental Disabilities Online Abuser Registry Verification; Ohio Department of Health Nurse Aide Registry; Ohio Attorney General Published Offender Check; System for Award Management; Ohio Medicaid Exclusion; and Ohio Department of Rehabilitation and Correction Offender Search.
- 3.3. **Supplemental Criminal Records Check:** The check made by CCHMC utilizing the Bureau of Criminal Investigation (BCI) and Federal Bureau of Investigation (FBI) criminal databases. This check also typically is completed prior to assigning a person to work, subject to occasional BCI or FBI delay.
- 3.4 **Excluded Status:** An individual or entity that has been excluded, debarred, or otherwise is ineligible to participate in federal government programs.

4.0 IMPLEMENTATION

- 4.1. CCHMC does not employ individuals who have been convicted of or pleaded guilty to a Disqualifying Offense or a substantially equivalent offense or have been excluded, debarred, or are otherwise ineligible to participate in federal government programs or if they have been convicted of federal offenses related to the provision of health care items or services.
 - 4.1.1. A person with a Disqualifying Offense who meets rehabilitation standards established by CCHMC in accordance with applicable law or regulation may be considered for employment.
- 4.2. Procedure for background and criminal records checks
 - 4.2.1. Human Resources will obtain the following from final candidates for CCHMC:
 1. Consent to conduct a background and criminal records check;
 2. Authorization for the release of the results;
 3. Biographic information necessary to complete the criminal records check; and,
 4. Fingerprint impressions
 5. Fingerprint impressions.

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4.2.2. Offers of employment are contingent upon satisfactorily passing the background and supplemental criminal records checks.

1. CCHMC will withdraw an offer of employment or terminate an employee if the background or criminal records check reflects that the individual has been convicted of or pleaded guilty to a Disqualifying Offense.

2. CCHMC will withdraw an offer of employment if the background or criminal records check reflects that the applicant has been arrested and is pending disposition for a Disqualifying Offense.

4.2.3. Human Resources oversees the confidentiality of the results of the background or criminal records checks. The report of the criminal records check is not a public record and is made available only to the applicant (or his/her representative), CCHMC, the State Department of Human Services or a County Department of Human Services, any court, hearing officer, or other necessary individual involved in a case dealing with the denial of employment to the applicant, or as otherwise required by legal process.

4.3. Arrests During Employment

4.3.1. An employee arrested for a Disqualifying Offense must report the arrest to CCHMC within fourteen (14) calendar days of the arrest. Failure to do so may result in termination of employment.

4.3.2. An employee arrested for a Disqualifying Offense will be immediately suspended without pay. The employee will have sixty (60) calendar days from the date of the arrest to provide a disposition of the matter that is acceptable to CCHMC. Failure to do so will result in termination of employment.

4.4. Employees will continue to be screened monthly for excluded status on the Office of Inspector General List of Excluded Individuals and Entities (LEIE) at <http://exclusions.oig.hhs.gov> and the General Services Administration System for Award Management (SAM) at <http://sam.gov>, and the Ohio Medicaid Exclusion List. The discovery of ineligibility status or addition of an individual to the LEIE or SAM databases or Ohio Medicaid Exclusion List will disqualify that person from further employment. Human Resources will notify Compliance of any findings relating to this monthly screening activity.

4.5. CCHMC will conduct renewal BCI and FBI criminal background checks every four years from an employee's hire date or otherwise as required by law.

5.0 OVERSIGHT

Human Resources will annually review and update this policy as appropriate. Questions regarding this policy shall be directed to Human Resources at 513-803-HR4U (4748) or HR4U@cchmc.org. Authority over this policy resides with the Senior Vice President of Human Resources and Chief Diversity Officer.

6.0 REFERENCES

HISTORY
Original Date 01/01/2009 (formerly B-06)
Revision Date 5/1/2010, 4/1/2012, 7/1/2014, 8/24/2015, 06/24/2021, 07/20/2022, 03/27/2023
Review Date 4/12/2017, 1/29/2018, 02/10/2021

