

POLICY TITLE:	HIRING AND BACKGROUND CHECKS	POLICY # 8.05	ADAPTED FROM	
Topic Area:	HUMAN RESOURCES	Page 1 of 6	REVIEW DATES	
Applies to:	LRE Staff	ISSUED BY: Chief Executive Officer APPROVED BY: Board of Directors	3/20/14	5/1/15
Developed and Maintained by:	LRE CEO, LRE Human Resources Coordinator		8/20/2015	10/3/2016
			11/13/2017	10/1/2018
			7/27/21	
Supersedes:	N/A	Effective Date: April 1, 2014	Revised Date: 8/3/21	

I. POLICY

Lakeshore Regional Entity is committed to attracting qualified applicants of diverse backgrounds to fill available positions and is an Equal Opportunity Employer. The hiring process will afford transparency and equitable opportunity appropriate to public employment. LRE will conduct background checks on all candidates for roles in the Agency prior to finalizing their association with the LRE, and will conduct periodic background checks on all staff members, as appropriate, throughout their association with the Agency. Upon hire, the Agency will have an introductory period of 90 days for both parties to evaluate the employment relationship.

II. PURPOSE

To recruit, hire, and retain a quality staff for Lakeshore Regional Entity.

III. APPLICABILITY AND RESPONSIBILITY

All LRE employees.

IV. MONITORING AND REVIEW

The LRE shall review at least annually, and as necessary, to maintain an adequate and acceptable standard of compliance and oversight as a Prepaid Inpatient Health Plan.

V. PROCEDURES

A. Hiring Process:

- Offers of employment may only be made after consultation with the Chief Executive Officer (CEO), or as delegated by the CEO to another Chief Officer.
- The LRE reserves the right to make employment classification changes for persons contracted to perform services on its behalf. In consideration of its budget, grant awards, and/or restructuring needs, this may include but is not limited to changing classifications from independent contractors to permanent employees or vice versa. Such employment classification changes

may be made at any time at the discretion of the Chief Executive Officer.

3. Internal employment opportunities may exist on occasion and may be filled by LRE employees who meet the minimum qualifications of the position. The LRE may fill a vacancy or new position on a temporary basis during the time necessary to fill the job on a regular basis. Internal employment opportunities for permanent transfers or promotions under the oversight and hiring of the CEO shall be made known to all LRE employees. The LRE is committed to providing opportunities to employees for development in their current job and to prepare them for positions of advancement. Factors such as demonstrated ability, dependability, experience, education and/or training, length of service, and performance evaluations are all pertinent to filling job vacancies or new positions. External posting for such opportunities may commence if the position supervisor finds no internal candidate of interest.
4. External employment opportunities shall be posted at each of the 5 Community Mental Health Service Programs (CMHSPs) within the LRE region when deemed applicable and advertised in other venues in order to garner qualified candidates for the employment opening.
5. An individual will be considered an external applicant if he or she submit an application, background check release, cover letter, and resume within the timeframe specified. Individuals will not be considered bona fide applicants if they:
 - a. Do not submit their application, background check release, cover letter, and resume to the LRE within the application timeframe specified.
 - b. Submit an unsolicited cover letter and/or resume when no employment opportunity has been posted.

In these instances, the submitted material(s) will not be retained and a letter to the individual will be sent indicating they have not met the conditions for being considered a bona fide applicant and the reason for this determination.

6. An individual will be considered an internal applicant if he or she submits a written statement of interest to the Human Resources Department as described in the job posting within the application timeframe specified. The statement must include a description of the individual's qualifications, background, experience, and the reason he or she is a good candidate for the position. A file of all such individuals deemed to be bona fide applicants will be established.
7. Applicant eligibility for the posted employment opportunity will be evaluated first by Human Resources Department staff. If the applicant does not meet the minimum qualifications for the position, Human Resources staff will note this information disqualifying the applicant from further consideration for the

position and will send the applicant a letter notifying them they do not meet the minimum qualifications.

8. The application, resume, and cover letter of applicants who meet the minimum qualifications for the position will be given to the supervisor of the open position for review.
 - a. If the position supervisor confirms that the applicant is qualified for the position and is a candidate of interest, he or she will notify Human Resources and Human Resources will continue to the next step in the application process with the applicant.
 - b. If the position supervisor determines that the applicant will not be considered further for the position, he or she will notify Human Resources and Human Resources will send the applicant a letter or email notifying him or her that another candidate was selected for the position.
9. Human Resources will conduct the relevant initial background checks for all eligible applicants continuing in the process.
10. Those applicants whose initial background checks meet the requirements will be eligible for further consideration.
11. Those applicants whose initial background checks do not meet the eligibility requirements will be sent a letter describing how they may seek to correct any errors in the records of background information sources. They will be removed from further consideration unless and until they are able to provide proof that the information revealed in the background check is in error. The selection process will continue with the other remaining applicants.
12. Human Resources will notify the supervisor of the open position of the status of all remaining qualified applicants who are still eligible for consideration by providing a matrix of information so that the supervisor may contact the candidates of most interest to schedule interviews, or it can be arranged for Human Resources to do this.
13. The supervisor of the open position will notify Human Resources of the candidates they will interview and will convey the date and time of the interview of each candidate, if they are scheduling the interviews.
14. Once the supervisor of the open position selects the candidate(s) they may wish to recommend for the open position, he or she will notify Human Resources and contact will be made with a minimum of two of the applicant(s) references to obtain additional information about past work experience and performance.
15. Once the supervisor of the open position selects the candidate they wish to

recommend for the open position, he or she will consult with Human Resources on an appropriate starting salary to ensure adequacy and equity.

16. If approved, the hiring supervisor along with Human Resources will contact the candidate selected to make the verbal conditional offer of employment.
17. If not approved, the hiring supervisor will work with the CEO and Human Resources to address the area(s) of concern and then make the verbal conditional offer of employment to the selected candidate or will select a different candidate to present for approval until an acceptable candidate and offer is determined, made, and accepted.
18. Once the selected candidate accepts the verbal conditional offer of employment by the hiring supervisor, Human Resources will send a written conditional offer of employment letter to the applicant confirming the details of the offer and the next steps in the hiring process, which include a criminal history check, pre-employment physical, TB test, and drug / alcohol screens.
19. Upon confirmation that the selected candidate has successfully passed the pre-employment physical, TB test, and drug / alcohol screens:
 - a. The start date for the new employee will be confirmed and HR will create the initial personnel file.
 - b. Internal candidates who were interviewed by the hiring supervisor for the position will be contacted by the hiring manager to inform them they have not been selected for the role.
 - c. External candidates will be sent a letter or email by Human Resources staff letting them know they have not been selected for the role.
20. Human Resources will close the open position and close the requisition file that includes information from all applicants and the interview guide forms, interview results forms, and reference check forms completed on all candidates in final consideration for the role. These documents will be retained in a secured location per the Records Retention Guidelines for the Agency.
21. Human Resources will include a copy of the selected applicant's cover letter, resume, application form, waiver and consent form, background check results, reference check forms and any other materials provided by the applicant during the application process in the new personnel file for the employees.

B. Background Checks –

The following background checks will be completed by Human Resources:

- Reference Checking – The references will include both past and present

supervisors as well as other employment colleagues who can objectively provide insight and perspective on the integrity and quality of the applicant's past work. There will be a minimum of two reference checks provided on each applicant. If a reference cannot be obtained, it is permissible to accept a copy of the candidate's last performance evaluation from the previous employer(s). For military veterans, a copy of discharge paperwork may be accepted in lieu of one reference. A "letter of reference" may also be used if its authenticity is able to be confirmed.

- Documentation of Professional Training – primary source verification of potential candidates must be obtained (highest college degree, license, credentials, or proof of other prerequisites of the job description). If the interviewing team feels a critical need to hire a qualified candidate before the original can be obtained, a copy of the necessary documentation will be accepted with the understanding that termination will occur if the primary source documentation is not received within 15 days of the date of hire.
- Verification of Clinical Staff Credentials and Background (as appropriate) – A check will be completed to ensure that clinical staff possesses the licensure or certification as indicated by the applicant. A background check can be obtained through the following website: <https://w2.lara.state.mi.us/VAL/License/Search>.
- Excluded and/or Debarred Staff – Verify the candidate and existing staff are not excluded from providing Medicaid services before hire. The inquiry will include both the HHS-OIG's list of excluded individuals and entities (<http://exclusions.oig.hhs.gov/>) and the SAM's list of parties debarred from federal programs (<https://www.sam.gov>). Candidates and staff who are listed as excluded and/or debarred are not eligible for employment.
- Criminal History, Credit, and Driving Record Checks (when applicable) – The HR Coordinator will contact the applicant, post offer, to obtain a signed release in order to complete these additional background checks. The HR Coordinator will complete the background checks of candidates and the hiring supervisor will be notified of the results. The COO or designee will conduct ongoing checks on staff.
- Drug Test/Physical/TB Test – The candidate will be informed at the time of the offer of the method for obtaining a physical, drug test, and TB Test, if applicable.

C. Introductory Period -

The first 90 days of employment is considered an introductory period. During this period, employees will become familiar with the LRE and their job responsibilities, and the LRE will have the opportunity to monitor the quality and value of their performance and make any necessary adjustments in the job description or responsibilities. Completion of this introductory period does not

imply guaranteed or continued employment. Nothing that occurs during or after this period should be construed to change the nature of the "at-will" employment relationship.

VI. RELATED POLICIES AND PROCEDURES