

**ST. LUKE’S-ROOSEVELT HOSPITAL CENTER
HUMAN RESOURCES POLICY AND PROCEDURE MANUAL**

Section/Policy Number: Recruitment & Staffing - #7007		
Subject: Pre-employment Background Investigation		
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Date Reviewed:		
Distribution: Human Resources Policy and Procedure Manual Holders		

Policy:

St. Luke’s-Roosevelt Hospital Center conducts a background screening on all candidates to whom it offers employment. The background screening is used to confirm information relevant to the applicant’s employment, including statements (and possible omissions) from the employment application and related employment forms. The screening may include but is not limited to searching court records for criminal convictions and verifying an applicant’s social security number, previous employment, education, and licensure. The Hospital Center will rescind an employment offer to an applicant who, either orally or in writing makes any false or misleading statements or material omissions in the course of the employment application process. The Federal Fair Credit Reporting Act (FCRA) give applicants certain rights whenever an employer uses a third party to verify employment related information. Whenever the Hospital Center uses a third party for that purpose, it will comply with FCRA.

Procedure:

1. All applicants, at the time they complete their application, will be given a Disclosure Statement and Authorization form, with attached summary of FCRA rights. (House staff will be given a letter of explanation in their contract package. Incoming house staff give consent when they sign and return their contracts to the GME Office.)
2. Pre-employment background screening will only be conducted for employees to whom we have extended a job offer.
3. For operational purposes, all applicants will be processed by the responsible Human Resources site office with the exception of incoming house staff, who will be processed by the house staff Coordinators and the Graduate Medical Education (GME) Office at each site.
4. The offer letter/contract to all prospective employees will:
 - State clearly that the job offer is contingent upon obtaining a “clear” background investigation report that is not in conflict with information provided by the applicant on the employment application or other employment related forms.
 - Instruct non-house staff employees to contact their respective recruiter three (3) business days after receipt of the employment offer if they will not be available on that date.

5. In general, the results of the background screening will be available 72 hours after being requested.
6. If the pre-employment screening investigation identifies information that is inconsistent with the information provided by the applicant and the inconsistency is deemed significant by the recruiter, HR will send the applicant a Notice of Intent to Take Adverse Action letter. Enclosed with the letter will be:
 - Document entitled “Summary of Your Rights Under the Fair Credit Reporting Act”
 - A copy of the background screening report
7. The applicant will have seven business days from the date of the letter to notify the company that compiled the background screening report if any of the information in the report is incorrect.
8. The company will investigate the alleged inaccuracy and notify the Hospital Center of the results of the investigation, generally within 72 hours from request.
9. If there was an error in the original report, the recruiter will contact the applicant and inform him/her of the outcome of the investigation and confirm the applicant’s start date.
10. If the applicant does not timely notify the company of an inaccuracy in the report or if, after an allegation of an inaccuracy, the investigation confirms the original report, the recruiter will send the applicant a denial letter indicating that the employment offer has been rescinded due to information contained in a consumer background investigation report. Although the applicant may obtain another free copy of the report from the company and has 60 days to dispute the accuracy of the report, the Hospital Center will NOT keep the position open for the applicant.
11. The HR recruiter or the GME Office will notify the appropriate department head/supervisor/program director that the applicant was not able to meet the requirements of the pre-employment process, but will NOT provide any additional or specific information about the reason that the employee will not be able to start work.

Corp. Vice President for Human Resources _____