
Chapter: **DIRECTLY-OPERATED PROGRAM MANAGEMENT**
Title: **BACKGROUND CHECKS OF EMPLOYEES / INDEPENDENT CONTRACTORS/INTERNS/VOLUNTEERS**
See also MCCMH MCO Policy 10-070, "Credentialing."

Prior Approval Date: 03/22/2017
Current Approval Date: 02/25/2020

Approved by: _____

Chief Executive Officer

Date

2-25-2020

I. Abstract

This policy establishes standards and procedures for Macomb County Community Mental Health (MCCMH) conduct of criminal record checks of all employees and independent contractors through the Macomb County Human Resources Department.

II. Application

This policy applies to all persons who are selected to be employed, independent contractors, interns, or volunteers at MCCMH. It also applies to employees, independent contractors, interns and volunteers of MCCMH seeking re-credentialing.

III. Policy

It is the policy of the MCCMH Board to safeguard the consumers, employees, independent contractors, volunteers, interns, and the public who use or visit MCCMH facilities by requiring all employees, independent contract providers, interns and volunteers to submit to the satisfactory completion of a criminal record check prior to a written confirmation of employment or contract, and as part of the re-credentialing process.

IV. Definitions

A. Background Check

A background check will include, but is not limited to, a check of criminal records held by the Michigan State Police, national registries, sanction lists, and exclusion lists, where applicable, per local, state and federal requirements.

B. Satisfactory Background Check

An applicant for employment or independent contract services, an employee or independent contractor seeking re-credentialing, an intern, or volunteer is revealed to have no background violations for which prevents MCCMH from employing, contracting or providing an internship or volunteer opportunity. , as verified by the Macomb County Department of Human Resources or contract agency

V. Standards

- A. The MCCMH Board requires a satisfactory background check as one component of the employment, contract, internship or volunteer consideration process and it is viewed as a condition for employment or contract service, and for re-credentialing, at MCCMH.
- B. Employment, contract services, internship, volunteer opportunity and re-credentialing shall be contingent upon the receipt of results of the background check satisfactory to the Macomb County Human Resources Department or the contract agency and the MCCMH Board. All information obtained from any criminal record check shall be kept confidential.
- C. Extenuating circumstances may be considered by the Macomb County Human Resources Department and the MCCMH Board when an applicant for employment, contract services, internship, volunteer opportunity, or re-credentialing does not receive a satisfactory background check.
- D. The final decision regarding whether to exclude the individual from employment, contract services, internship, volunteer opportunity, or re-credentialing at MCCMH will place primary emphasis on the safety and security of MCCMH consumers, employees, independent contractors, volunteers, interns, and visitors.
- E. A satisfactory background check needs to be repeated every two years at the point of re-credentialing, in accordance with MCO Policy 10-070, "Credentialing." The background check shall be conducted by the Macomb County Human Resources Department or the contract agency pursuant to procedures approved by the County of Macomb.

VI. Procedures

- A. Employees, independent contractors, interns or volunteers shall be notified of the background check requirement via the position posting, at the time of offer of employment, or prior to re-credentialing.
- B. Employees, independent contractors, interns and volunteers shall complete the required information on the applicable Background Check Authorization form

- C. Each completed Background Check Authorization form shall be forwarded to the MCCMH Chief of Staff for authorization signature.
- D. The MCCMH Personnel Clerk shall keep a copy of the Background Check Authorization and forward the original to the Macomb County Human Resources Department.
- E. The Macomb County Human Resources Department shall complete the Background check for the County employees, interns and volunteers. MCCMH Chief of Staff will complete the background checks for the independent contractors. Contract agencies will complete the background checks for their employees. The MCCMH Chief of Staff will be notified whether the person can be offered employment a contract for services, an intern, volunteer, or be re-credentialed by the employer of record.
- F. The Chief of Staff, or designee, shall notify the interviewer(s) whether the individual(s) may be offered employment , a contract for services, an internship, or a volunteer opportunity, or shall notify the MCCMH Quality Division Director or or Designee, when there is an issue with re-credentialing.
- G. For the re-credentialing of staff, the procedures of MCO Policy 10-070, "Credentialing and Re-credentialing," shall be followed, namely, that every two years (at the point of re-credentialing), the Quality Director or Designee will notify the MCCMH Chief of Staff, or designee, 90 days prior to the re-credentialing date of each staff person and forward the authorization form to the employee/independent contractor, who shall submit the signed form to the MCCMH Chief of Staff. The Chief of Staff, or designee, shall notify the Macomb County Human Resource Department to do a re-check of the criminal conviction record for each staff person.
- H. Any subsequent inquiries from the employee, contract service applicant / provider, intern, or volunteer shall be directed to the Macomb County Human Resources Department or contract agency of employee.

VII. References / Legal Authority

- A. Commission on Accreditation of Rehabilitation Facilities (CARF) 2019 Behavioral Health Standards Manual
- B. MCO Policy 10-070, "Credentialing and Re-credentialing"

VIII. Exhibits

- A. None.