

## Applicant Pre-Employment Screening Policy

**Purpose:** Entities affiliated with the Sevita brand (the “Company”) provide care to vulnerable adults and children, and federal and state governments fund most of that care. Applicant pre-employment screenings are essential for:

- hiring qualified, trustworthy, and competent employees to provide care for our vulnerable individuals;
- protecting vulnerable individuals from abuse, neglect, and exploitation;
- enhancing outcomes for the individuals in our care;
- hiring qualified, trustworthy, and competent employees because they have access to individuals’ and the Company’s funds and confidential information (including individuals’ PHI and PII);
- maintaining a safe and secure workplace;
- fostering trust in the services we provide and the people who provide them;
- reducing the risk of errors or misconduct;
- preventing fraud, theft, and misappropriation; and
- maximizing compliance with federal, state, and local laws.

**Applicants must actively participate in and successfully complete all aspects of the pre-employment screening as a mandatory condition of employment.**

**Scope:** This policy covers every applicant who is applying to work as an employee for the Company in any role in any location.

**Policy Statement:** As part of the hiring process, the Company performs pre-employment screenings on all applicants.

***For every applicant for every role***, the Company will perform:

(1) Company required screenings

- Office of Inspector General (“OIG”) Exclusion List
- Criminal History – with no time limit, unless federal, state, or local law explicitly imposes a time limit
- National Sex Offender Registry
- Social Security Number Verification
- FACIS Level 3
- Professional References
- Employment History Verification
- Education Verification

(2) all screenings required for Direct Support Professionals in the applicant's state under federal, state, or local law or provider contracts (other than medical screenings and drug tests)

(3) additional screenings for applicants depending on the position, including but not limited to:

- Motor Vehicle Records
- Professional License and Certification Verifications
- Credit History (as allowed by applicable law)
- Medical Screenings
- Drug Tests (when federal or state law, professional licensure, or professional certifications require it) and
- Any other screening required by federal or state law, a provider contract, or the Company's operational needs.

**Compliance with Applicable Laws:** The Company conducts screenings and assesses screening results in accord with all applicable federal, state, and local laws, including the Fair Credit Reporting Act, state fair credit reporting statutes, and equal employment opportunity and fair chance laws.

**Eligibility Standards:** The Company may choose not to hire an applicant based on pre-employment screening information. However, a criminal record will not automatically disqualify an applicant from employment with the Company. Rather, the Company will perform any assessment that federal, state, or local law requires, which might include an individualized assessment to determine whether the criminal record is job-related and the applicant will pose a risk to the Company, its assets, its employees, or the individuals under our care.

Because the Company provides care to vulnerable individuals and receives federal and state funds, the types of screening information that could disqualify an applicant from working for the Company (based on any legally-required assessments) include (but are not limited to) situations where an applicant:

- fails or refuses to participate in the Company's mandatory background check process;
- is identified on the OIG list of individuals excluded from billing to federal health care programs, or any other list maintained by a federal or state agency that would exclude a person from working for the Company;
- is excluded from hire by a state licensing agency because of abuse, neglect, exploitation, or maltreatment;
- is identified on a state licensing agency maltreatment database as having a history of maltreatment of a vulnerable adult or child, unless unsubstantiated;
- has a criminal history or substantiated allegations of abuse, neglect, or exploitation of any child or vulnerable adult;
- has a criminal history of murder, mayhem, rape, sexual assault, assault and battery, human trafficking, cybercrimes, fraud, misappropriation, or identity theft;

- has a history of behavior that is incompatible with caring for children and vulnerable adults (for example, violence, substance misuse, abuse/neglect/exploitation/maltreatment of children or vulnerable adults, etc.);
- does not have the minimum educational requirements for the role;
- does not have valid current professional licenses or certifications (if required);
- for a role with driving as a responsibility
  - does not have a valid driver's license with at least one year of experience
  - does not have a valid vehicle registration
  - does not have an active auto insurance policy with minimum state insurance coverage limits (if driving their personal vehicle at work) or
  - has a serious moving violation or a pattern of moving violations (including driving under the influence, driving while intoxicated, and reckless driving);
- lied, provided false information, or misrepresented information in an interview or on a resume, application, or form;
- does not comply with or fails any required drug testing or medical screening requirements;
- has previously worked for the Company and is ineligible for rehire; or
- has other indicators of unsuitability for a caregiving environment, as determined by the Company in compliance with applicable law.

**Administration:** Human Resources oversees the background check process and will periodically review this **Applicant Pre-Employment Screening Policy** and update it as necessary to remain compliant with federal, state, and local laws and to meet the Company's needs. If you have questions about the **Applicant Pre-Employment Screening Policy**, or how the Company implements it, please contact the HR Service Center at 888-774-4872.