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<b>SUBJECT:</b>	Background Checks
<b>POLICY NO:</b>	VII:07
<b>APPLICABLE TO:</b>	Individuals Being Offered Employment, Transferred, Promoted, Reassigned
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<b>EFFECTIVE DATE:</b>	
<b>REVISION DATE:</b>	August 1, 2018 (due to name change)

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## **I. POLICY:**

The Hennepin Healthcare Research Institute (HHRI) believes that hiring qualified individuals contributes to the overall success of HHRI. Background checks serve as an important part of the selection process. The information that is collected helps HHRI promote a safe work environment for our current and future employees. Background checks also help us obtain information necessary to determine an applicant's overall employability and to ensure the protection of HHRI's physical property, proprietary information and other assets. HHRI complies with all applicable federal, state and local laws, including fair employment practices and equal employment opportunity, when conducting background checks.

## **II. PROCEDURES:**

- A) HHRI requires all new hires and rehires, and current employees being transferred, reassigned or promoted to a different position, to complete and successfully pass all necessary components of a background check as a condition of employment. These requirements must be satisfied prior to the person's first day of employment with HHRI or prior to their change in status if a current employee. Failure to successfully pass all necessary components of a background check, as determined by the HHRI, in its sole discretion, may result in the withdrawal of the offer of employment or the termination of employment for current employees.
- B) When a criminal history record/Motor Vehicle Record (MVR) check is required, the human resource department will request that the internal or external applicant for the position provide written authorization for the background investigation using the company-provided form and will conduct the check via a third-party vendor.
- C) HHRI will inquire only about convictions and not about arrests, unless required by applicable law.
- D) The pre-employment background check process usually requires 3-5 days to complete following the receipt of all information needed from the applicant to complete the process.
- E) The background check may begin prior to an actual offer of employment, provided that the applicant has been selected for an interview and the applicant provides written consent. In most instances however, an offer of employment will be extended prior to beginning the background check process. An applicant may not begin employment with HHRI until this background check is complete and satisfactory information is reported. In the event that an applicant should begin employment before the background check is complete, and Negative Information (Negative Information consists of any piece information which is contrary to or conflicts with the information provided by the individual to the Company, any criminal records found or any other information that HHRI determines adversely impacts the applicant's suitability for hire) is discovered after the person's official "start date," HHRI reserves the right to terminate employment.
- F) Current verifications performed by HHRI include: criminal record search, MN DHS for patient contact individuals, fingerprinting for HRSA positions, employment references, driver's license verification and/or motor vehicle reports and auto insurance verification if position requires



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driving, and professional licensure verifications. Types of verifications may be added or deleted as business demands change. The types of verifications performed will be determined by the job an applicant seeks.

- G) A conviction is not an automatic disqualification from employment. Each conviction is reviewed based on a number of factors. The following factors will be considered for those applicants with a criminal history in determining whether to hire the external applicant, or to transfer or promote the internal applicant.
- a. The nature of the crime and its relationship to the position.
  - b. The time since the conviction.
  - c. The number (if more than one) of convictions.
  - d. Whether hiring, transferring or promoting the applicant would pose an unreasonable risk to the business, its employees or its customers and vendors.
- H) Before allowing an employee to use their own vehicle while on company business, it is important that HHRI has determined that the employee is capable of operating the vehicle in a safe manner. In doing so, HHRI obtains a MVR on the employee for the past three years and verifies the employee carries a minimum of 100/300/100 liability insurance coverage and does not have a "business use" exclusion in their insurance policy. These checks are done upon expiration of insurance coverage and annually on MVR checks.
- I) In accordance with applicable laws, including the federal Fair Credit Reporting Act, if the HHRI is considering rejecting an application or withdrawing a conditional offer based on information contained in the criminal background/MVR check, before the HHRI does so, the applicant will be given an opportunity to review the criminal background/MVR check results and submit an explanation. If an applicant is found to have falsified any information regarding conviction history, the applicant will not be considered for employment.
- J) If an employee seeking a transfer or promotion is found to have falsified any information regarding conviction history, the employee may be immediately discharged.