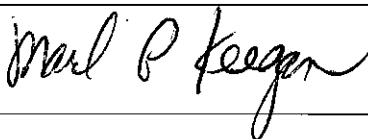


**Catholic Charities Disabilities Services
Agency Standard and Procedure**

Standard Category	Human Resources
Standard Title	Sanction Screening & Credentialing Review
Regulations	
Original Issue Date	4/27/11
Latest Revision Date	12/14/17
Number of Pages	3
Attachments	Sanction Screening Authorization Form
Approved by: Mark Keegan, Executive Director	

I. Standard

Catholic Charities Disabilities Services (CCDS) is committed to ensuring that no member of the Board of Directors, employee, independent contractor or vendor has been: 1) convicted of a criminal offense relating to health care, including conviction for a criminal offense relating to neglect or abuse of residents in connection with the delivery of a health care item or services, conviction for an offense relating to health care fraud and conviction for an offense relating to obstruction of an investigation of a criminal offense related to the delivery of an item or service under Medicare or a state health care program; or 2) sanctioned, debarred, excluded or otherwise ineligible for participation in a federal health care program which is defined as any plan or program that provides health benefits, whether directly, through insurance, or otherwise, which is funded directly, in whole or in part, by the United States Government or any state health care program.

For that reason, Catholic Charities of the Diocese of Albany will screen members of the CCDS Board of Directors, employees, independent contractors, and vendors against the exclusion lists maintained by the U. S. Department of Health and Human Services Office of the Inspector General, the U.S. general Service Administration, and the New York State Office of the Medicaid Inspector General.

It is within the discretion of Catholic Charities to determine whether Catholic Charities will enter into or continue business relations with a board member, employee, independent contractor or vendor with the above-mentioned referenced conviction or finding on the debarment check.

II. Board of Directors

Prior to appointment on the CCDS Board of Directors, the candidate's name and date of birth will be forwarded by the CCDS Executive Director, or designee, to the Catholic Charities of the Diocese of Albany HR Department for initial sanction screening.

Catholic Charities of the Diocese of Albany Human Resource's Department will complete sanction screening for all current members of the CCDS Board of Directors on a monthly basis. The CCDS Executive Director will be responsible to inform Catholic Charities of the Diocese of Albany of any changes in composition of the Board.

III. Employees, Interns and Volunteers

The CCDS Human Resources Department will have each applicant complete a sanction screening authorization form and will submit the information to Catholic Charities of the Diocese of Albany HR Department to check prior to hire or engagement. Catholic Charities of the Diocese of Albany HR Department will complete sanction screening for all CCDS employees, interns and volunteers on a monthly basis. This applies to interns and volunteers who perform a service directly or indirectly, in completely or in part, that is paid by any federal health care program.

IV. Vendors & Independent Contractors

All written contracts with vendors and independent contractors will contain the following language:

"Catholic Charities Disabilities Services is precluded from entering into an agreement with any person or entity which has been: (1) convicted of a criminal offense relating to health care, including conviction for a criminal offense relating to the delivery of an item or service under Medicare or a state health care program, conviction for a criminal offense relating to neglect or abuse of a residents in connection with the delivery of a health care item or services, conviction for an offense relating to health care fraud and conviction for an offense relating to obstruction of an investigation of a criminal offense related to the delivery of an item or service under Medicare or state health care program; (2) sanctioned, debarred, excluded or otherwise ineligible for participation in a federal health care program which is defined as any plan or program that provided health benefits, whether directly, through insurance, or otherwise, which is funded directly, in whole or part, by the Unites States Government or any state health care program.

"This certifies that the undersigning vendor and its employees have not been convicted of a criminal offense relating to health care or been sanctioned, debarred, excluding or otherwise found ineligible to participate or engage in any work involving a federal health care program. The undersigning vendor is required to inform Catholic Charities Disabilities Services within five business days of receiving any written or oral notice of any adverse action."

All vendors requesting payment for services rendered will be screened for sanctions by Catholic Charities of the Diocese of Albany on a monthly basis.

V. Credentialing Review

For employee or independent contractors where the services performed for CCDS require a professional license, the CCDS Human Resources Department will verify that the required license is current before a contract is approved or an employee is hired.

On a monthly basis, the CCDS Human Resources Department will ensure that all employees, consultants and independent contractors, who require licenses, are appropriately licensed. Employees or independent contractors who are not appropriately licensed may not be permitted to deliver services until the issue is resolved.



Notification and Release Authorization

Please be advised that Catholic Charities intends to use a consumer and/or investigative consumer report as part of your application for employment and continued evaluation during the course of your employment with the company should you become employed. Your consent for the procurement and use of such a report is required. The consumer report will contain information from public records, which may include, but are not limited to, social security number and other information bearing on your education history, employment history, and criminal history, to the extent permitted by law. An investigative consumer report can contain information from public records as stated above, in addition to interviews with employers, neighbors, friends, and associates for knowledge concerning your character, general reputation, personal characteristics or mode of living.

Authorization:

I voluntarily and knowingly authorize any party or agency contacted to give records they may have concerning my social security number, credit worthiness, credit standing, credit capacity, motor vehicle operation history, employment history and performance, education history, criminal history, or other information to the extent permitted by law. I voluntarily, knowingly and unconditionally release any named or unnamed informant from any and all liability resulting from the furnishing of this information.

I further understand that, upon my written request, I will be given the name and address of each consumer reporting agency from which a consumer report or investigative consumer report may have been obtained, and, if an investigative consumer report has been obtained, a description of the nature and scope of the investigation. I understand that I may obtain additional information concerning the report by contacting the consumer reporting agency.

The report will be prepared by: **Summit Security Services, Inc.**
390 RXR Plaza, Uniondale, NY 11556
888.869.8444

This company's Privacy Policy can be viewed at: <http://www.summitsecurity.com>

I understand that any consumer report or investigative consumer report prepared will be used strictly for employment purposes as defined in the Fair Credit Reporting Act, as a report to be used for the purpose of evaluation for employment, promotion, reassignment or retention as an employee. I further understand that any offer of employment, promotion or reassignment will be conditional upon the receipt of satisfactory information as required and that to be considered for employment, promotion, or reassignment; I must authorize the procurement of such Report(s). A photographic or faxed copy of this Notification and Release Authorization shall be as valid as the original.

ALL Applicants: I acknowledge having received "A Summary of Your Rights Under the Fair Credit Reporting Act"

The following information must be filled out completely and signed by all applicants:

PLEASE PRINT ALL INFORMATION BELOW

Last Name, First Name, Middle Initial:	Social Security Number:
Additional Name(s) Used:	Date of Birth/Place of Birth:
Current Address (street, city, state, zip)	

Signed: _____

Dated: _____

Name: _____

EDUCATION

School Name:		Date of Graduation:	
City:	State / Province:	From:	To:
Degree Type & Course of Study:			
Name used at time of graduation:			

SUMMIT SECURITY SERVICES, INC.

390 RXR PLAZA, UNIONDALE, NY 11556 • T 800.615.5888 • F 516.686.0635 • WWW.SUMMITSECURITY.COM



FREQUENTLY ASKED QUESTIONS ABOUT BACKGROUND SCREENING

1. Can I get a copy of my report?

Yes. You are entitled to a copy of the report if adverse action is taken by a potential employer. You can also request a copy of the report directly from Summit at 888.869.8444.

2. What can I do if the results of my background check are inaccurate?

Under the Fair Credit Reporting Act (FCRA) you have the right to dispute the accuracy or completeness of any information contained in your file. Please contact:

Summit Security Services, Inc.
390 RXR Plaza, Uniondale, NY 11556
888.869.8444

3. I recently had a background screen completed – do I have to go through this process again?

Summit has no authority or say in whether you need to go through the process again. Please contact your local hiring or volunteer supervisor to discuss with them.

4. Why is my SSN required?

A Social Security number is an individual's unique identifier that helps researchers conduct thorough and accurate background investigations. Use of the SSN assists researchers by potentially validating if the number is a real SSN issued in a timeframe after the individual's date of birth, and helps reveal past addresses and possible additional name variations so that a targeted search can be conducted. Additionally, it can help rule out erroneous information. Due to the background investigation requirements of the Roman Catholic Diocese of Albany, background investigations cannot proceed with the individual providing their SSN, unless the individual was never issued a SSN.

5. Who will have access to my information?

Only those individuals with a business need to know will have access. This means the designated Summit researchers and only select RCDA employees. RCDA employees at the local level, including schools and parishes, will not be able to see an individual's personal data. Third parties who maintain SSN databases may have access as well. These parties are credentialed to ensure their privacy and security policies are at the highest available standard.

SUMMIT SECURITY SERVICES, INC.

6. How do you secure my information?

Summit is committed to protecting the personal information it receives from and about consumers. Accordingly, Summit has developed this Privacy Policy in order for interested parties to understand how Summit collects, uses, discloses, and protects consumers' personal information.

<http://www.summitsecurity.com/privacy-policy/>

Privacy initiatives and procedures include, but are not limited to:

- Access to personal information is limited within Summit to those who have a business "need to know" the information. Access to Summit's computer terminals, file cabinets, fax machines, trash bins, desktops, etc., are secure from unauthorized access.
- Summit maintains a secure network to safeguard personal information from internal and external threat.
- Any backup data is maintained in an encrypted form.
- Summit maintains records on each request for information and identifies each user who requested information on a consumer.
- Employees are prohibited from "browsing" files or databases without a business justification.
- Summit follows the Federal Trade Commission's requirement that consumer information be unreadable upon disposal.

7. Where can I go to learn more about background screening?

Background screening for employees and volunteers is heavily regulated by the federal and state laws. To learn more about your rights as a consumer, please go to the Consumer Financial Protection Bureau (<http://www.consumerfinance.gov/>).

To learn more about the industry as whole, please visit the National Association of Professional Background Screeners (NAPBS) website (<http://www.napbs.com/consumers/index.cfm>).

SUMMIT SECURITY SERVICES, INC.