



ESSENT HEALTHCARE, INC.

Section: Corporate Compliance	Effective Date:	01/01/06
Subject: Background Checks for Physician Recruits	Revision Date:	01/01/06
Policy #: CC-27	Review Date:	11/19/09
Responsible Party: Corporate Compliance Officer	Revision #:	1

Scope:

This policy applies to all Essent facilities.

Purpose:

The purpose of this policy is to set forth the process for conducting background checks on non-employed physician recruits. This policy is a supplement to and does not replace the Human Resources policies and procedures regarding background checks for employees, agents, and/or and associates.

Policy:

It is the policy of Essent Healthcare, Inc. to conduct a complete and thorough background check on all physician recruits. In addition, documentation supporting the background check is to be submitted with the contract for corporate approval.

Procedure:

1. Careful selection of physician recruits is essential to the success of Essent Healthcare, Inc. The Company consistently strives to select and recruit the most qualified candidates. All non-employed physician recruits shall undergo a thorough background check by an independent investigation company prior to beginning work. All background checks will be conducted in accordance with applicable federal, state and local laws using criteria established within this policy.
2. All potential recruits shall be informed that, if selected, a background check will be conducted.
3. An "Authorization to Release Information" form must be completed and signed by the recruit prior to a background investigation being conducted. If the potential recruit refuses to complete this release, no recruitment offer shall be made.
4. The preferred provider of background checks is Kroll Background America, Inc., however other methods may be used at the discretion of the facility. At a minimum, background checks for non-employed physician recruits must include the following:



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Minimum Requirements for Background Checks for Non-employed Physician Recruits

- Social Security Number Trace*
- Criminal Records Search [County Criminal Records Search (es) ** and/or Statewide Criminal Records Search (es) **] - Jurisdictions Searched Based on a Minimum of the Last 7 Years of Resident history
- Massachusetts Statewide Check (CORI)
- Federal Criminal District Court Records Search-National Jurisdictions Searched
- Based on a Minimum of the Last 7 Years of Resident history
- FACIS®
- Motor Vehicle Report**
- US Criminal Record Indicator
- Consumer Credit Report
- National Practitioner Databank Search

*KBA utilizes a method called the Social Security Number (SSN) Trace. KBA will perform a Social Security Number Trace on each applicant/employee to cross reference identifying information and addresses provided by the applicant/employee with those produced by the Social Security Number Trace. This method can identify residence history where an applicant/employee may have a criminal record or pending charge which was omitted from their application.

**Plus County, Statewide, and Motor Vehicle Report (MVR) access fees if applicable. These fees are strictly third party pass through fees charged by government entities to access public records. Of the 3460 counties-including city of, town of and village of, approximately 12.23% have access fees. (Excluding MO, NY, and SD the % of access fees is reduced to 5.12%) State access fees vary from \$3.75 -\$52.00 and some states do not have access fees. All MVR's have access fees with the average fee \$6.25 nationally. Your institution will receive a detailed accounting of such fees if applicable.

5. The facility CEO will review any situation in which an applicant is found to have a criminal conviction, to determine his/her suitability for recruitment. Information such as the nature and gravity of the crime, the date that the crime was committed and the relatedness of the crime to the job will be taken into account.



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6. Information learned during a background investigation is to be considered with all other information known about the potential recruit. The potential recruit may be asked to provide additional clarification regarding potentially concerning information. Each potential recruit shall be evaluated by the facility CEO on a case-by-case basis to determine his/her suitability for recruitment.
7. The facility will provide the recruit with the source of his/her credit report, as required by the Fair Credit Reporting Act and will notify the recruit of the final disposition of his/her application.
8. Potential recruits who are residents of Oklahoma, California or Minnesota will be given the acknowledgement form specific to their state. Residents of these states may request a copy of the results by checking the appropriate box on the Acknowledgement form.
9. Documentation of the background check is to be submitted along with the recruiting agreement for corporate approval.

References:

Human Resources Policies and Procedures
Stark II