

Vermont Catholic Charities, Inc.
Residential Care Homes Policies and Procedures

SUBJECT: Employment Practices Guidelines & Procedures	Policy Number HR0002
	Section: Human Resources
	Sub-Section: Employment
	Approved Date: March 1, 2010 Updated: October 1, 2017

INTRODUCTION

Vermont Catholic Charities, Inc., is committed to creating a positive work environment and offering an equal employment opportunity to all qualified persons, without regard to race, color, national origin, sex, age, ancestry, religion, place of birth, physical or mental condition, veteran or handicap status or any other factor which may be considered discriminatory. VCCI will follow the teachings of the Catholic Faith in regards to employment and organizational decisions.

Decisions relating to all matters of employment including: upgrades/downgrades, transfers, promotions, layoffs, termination, rates of pay, training, recruitment and advertising, will be based on the employee's work record and qualifications within the Organization.

Vermont Catholic Charities, Inc., is committed to a selection process that results in each position being filled by the most qualified candidate. The Organization will base its selection process on the essential functions and abilities required for the position. We recognize that our current employees create our standard for high caliber performance, and not only offer a proven record of performance, but also a familiarity with Organization goals and philosophies. For these reasons, internal candidates will be given priority consideration for vacant positions.

The Employment Practices Policy will encompass the following:

- A. Equal Employment Opportunity (EEO Statement)
- B. Employment at Will
- C. Employment Provisions of the Americans with Disability Act (ADA)
- D. Immigration Law Compliance
- E. Employment of Relatives (Conflict of Interest)
- F. Interview Process/Application Retention/Background Verifications
- G. Employee Personnel Files
- H. Internal Job Openings
- I. Employee Appointment Announcement
- J. Involuntary Termination
- K. Voluntary Termination
- L. Exit Interviews
- M. Rehire/Reinstatement

**A. EQUAL EMPLOYMENT OPPORTUNITY STATEMENT
POLICY**

VCCI herewith states and affirms its continuing policy of an Equal Employment Opportunity to all persons without regard to race, color, religion, national origin, sex, age, ancestry, place of birth, physical or mental condition, veteran or handicap status or any other factor which may be considered discriminatory. The VCCI is committed to the principles of equal employment opportunity. *With the exception of a commitment to support, understand and not act contrary to the teachings of the Roman Catholic Church*, equal treatment and an equal employment opportunity takes place in all employment practices: recruitment, hiring, training, benefits and compensation, promotion, demotion, transfer, and termination.

All personnel are employed without regard to race, color, national origin, sex, age, ancestry, place of birth, physical or mental condition, veteran or handicap status, or any other factor which may be considered discriminatory.

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Employees selected, will be expected to learn, understand and follow the guidelines of the Roman Catholic Church and VCCI.

PROCEDURES

1. VCCI will recruit, hire and promote employees without regard to race, color, national origin, sex, age, ancestry, religion, place of birth, physical or mental condition, veteran or handicap status, or any other factor which may be considered discriminatory.
2. VCCI will expect a commitment to support, understand, and not act contrary to the teachings of the Roman Catholic Church. VCCI will base employment decisions on furthering the principles of an equal employment opportunity by composing only valid requirements for a position.
3. VCCI will ensure that promotion decisions are in accordance with principles of equal opportunity employment, by imposing only valid requirements for promotional opportunity.
4. VCCI will ensure that all other Human Resource actions including, but not limited to, compensation, benefits, transfers, layoffs, return from layoffs, training, tuition assistance, social and recreational programs will be administered without regard to race, religion, color, sex, age, disability, or national origin.
5. The Office of Human Resources has been designated as the Equal Employment Opportunity Officer. As such, the Officer is charged with direct responsibility to monitor all equal opportunity activities throughout the Organization and for assuring attainment of our stated objective for full compliance.
6. If an employee believes that they have been discriminated against on the basis of race, color, sex, age, disability, or national origin, and/or any of the aforementioned categories on page 1, the Executive Director and/or the Director of Human Resources should be notified for appropriate action.
7. Investigations of these matters will be handled fairly and objectively, with the appropriate level of confidentiality and discretion. In resolving these issues, the Organization will make every effort to respect the rights of all employees involved. The Administrator, Executive Director, and the Director of Human Resources shall be informed immediately and confidentially, of any formal complaints filed by an employee and the course of action proposed to investigate the matter.

B. EMPLOYMENT AT WILL

POLICY

It is the policy of VCCI not to enter any employment contracts or implied employment contracts except as directed by the Director of Human Resources and the Executive Director of VCCI.

The working relationship between Vermont Catholic Charities, Inc., and its employees is and will be, one of voluntary employment “at will”. Neither the employee nor the Organization has entered into a contract of employment, expressed or implied.

Employment without regard to position is voluntarily entered into for no stated term or period of time. Vermont Catholic Charities, Inc., maintains the right to terminate an employee at any time, at its sole discretion, with or without cause being shown. This means that the Organization or employee is free to end the employment relationship at any time.

C. Employment Provisions of the Americans with Disabilities Act (ADA)

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Title I of the Americans with Disabilities Act prohibits discrimination in any terms or conditions of employment against qualified individuals with a disability.

The Americans with Disabilities Act requires that employment decisions be based on the ability of a person to perform the essential functions of a job and not preconceived notions about a person’s disability or limitations.

Further, it requires management to reasonably accommodate individuals with disabilities if a reasonable accommodation is available that will permit the individual to perform the essential functions of his/her job.

To comply with the employment provisions of the Americans with Disabilities Act, the VCCI will:

1. Identify the essential functions of a job;
2. Determine whether a person with a disability, with or without accommodations, is able to perform the essential functions of the job; and,
3. Unless it would pose an undue burden, provide a reasonable accommodation to a qualified individual, if one exists, that will permit the individual to perform the essential functions of his/her job.

D. Immigration Law Compliance

POLICY

VCCI is committed to employing U.S. citizens and aliens who are authorized to work in the United States, and will not unlawfully discriminate on the basis of citizenship or national origin.

As a condition of employment and in compliance with the federal Immigration and Reform Control Act (IRCA) of 1986, each new employee must complete an Employment Eligibility Verification Form (Form I-9) and present documents that establish identity and employment eligibility. A list of acceptable documents can be found on the I-9 Form.

If proper identity and employment eligibility documents are not provided, an employee will not be hired or allowed to continue employment. Employees authorized for employment on a temporary basis must submit updated documents prior to their eligibility expiration date in order to continue employment.

E. Employment of Relatives (Conflict of Interest)

POLICY

It is the policy of Vermont Catholic Charities, Inc., to not hire, transfer, or promote relatives of employees into situations where the possibility of favoritism, discrimination or conflicts of interest might exist. Therefore, applicants will not be hired if related and those employees currently related and “grandfathered” cannot be promoted or transferred into the same department where a relative is already employed, or areas where relatives may have direct supervision or significant influence. Any exceptions must be approved by the Executive Director of VCC with consultation by the HR Director.

1. For the purposes of this policy, relatives are defined as an employee’s parent, child, grandparent, spouse, brother or sister, in-laws, aunts, uncles, nieces, nephews, and step- relationships.
2. When a situation that conflicts with this policy arises through promotion, transfer, or marriage, a change of assignment will be necessary for one of the two individuals affected. Working with the Administrator and Human Resources, individuals will have a period of three (3) months in which to resolve the situation.

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3. Relatives of employees are eligible for short-term interim jobs, or positions that are intended to be of limited duration such as summer employment, Christmas breaks, spring breaks, etc. However, temporary employees remain ineligible for full-time regular positions available in a department in which a relative is employed.

F. Interview Process/Application Retention/Background Verification

POLICY

It is the responsibility of the VCCI Executive Director, Controller, and Administrator in conjunction with Human Resources, to authorize the hiring of new employees. All full-time employees must have the authorization of the Executive Director.

The Administrator is responsible for recruiting, interviewing, screening, selecting and overall adherence to the Employment Practice Guidelines and Procedures of the Organization. The Executive Director and HR are available for guidance and review of candidates.

In all cases it is required that candidates being interviewed and approved, be interviewed by the supervisor and by one (1) reporting level above the position to be filled. Reference checks will be conducted, noting at minimum of 2 former employment references. If, 2 former references cannot be completed, then 1 former employment reference and 2 personal references must be submitted as record of the file.

Employees in the position of managing money, managing the assets/liabilities, working with children, and vulnerable people (Level III Homes) will be subject to background verification per the regulation set forth by the guidelines of the Agency of Human Services –Department of Disabilities, Aging and Independent Living. All employees will sign authorization forms prior to the background verifications being complete. All information obtained will remain confidential. If an applicant becomes disqualified due to the results of the background verification, the applicant will be provided the information and all information will be disclosed. This policy also includes volunteers working with children and any vulnerable individuals (Level III Homes).

PROCEDURES

All candidates for employment with the VCCI must fully complete, date, and sign an employment application form. A resume will not be accepted in lieu of a completed employment application. The application form should be completed in detail and signed by the applicant to verify the accuracy and completeness of previous employment and personal information.

VCCI may investigate any portion of the requested information and may deny or later terminate the employment of anyone giving false, misleading, or incomplete information.

The completed employment application form will be made part of the personnel file of those applicants accepted for employment.

All other employment applications received will be filed for a period of no less than 13 months.

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Background checks can only be submitted after a job offer has been extended. All employees will receive an offer of employment before the background check is completed.

It is the policy of VCCI to request information regarding an applicant’s previous employment from their employer(s) in order to obtain the prospective employee’s work record as it pertains to their application for employment.

The background verification forms are state and federal forms and will have the applicant authorization prior to any verification. Applicants subject to background checks will be told why the background verification is being conducted.

G. Employee Personnel Files

Policy

Vermont Catholic Charities, Inc., will follow all state and federal regulation in regards to personnel files.

Procedure

All Homes will maintain an employee file for active employees in a secure location and locked file system. To ensure that the Home and Vermont Catholic Charities, Inc., have accurate and current information about employees, in order to process payroll and benefits, and to have a means to contact employees as need; it is the employees responsibility to notify the Administrator immediately if any changes occur in the employee’s name, address, telephone number, tax exemption status, marital status, or other personal information.

All Homes will retain the following in each file:

- Employment Application
- Resume
- W-4
- New Hire Checklist
- Wage and Status –New Hire Paperwork
- Any change of status regarding the employees (wage, address, etc)
- Signed copies of all policies
- Performance Appraisals
- Corrective Action Forms
- Letters of Warnings

(Homes will copy file for VCCI files at the main office and provide copies of any write-ups for the electronic file.)
(Files cannot have any medical information; therefore, any benefit information should be maintained separately.)

- I-9 Form –Per federal regulation this should be maintained separately.

All terminated employee files should be maintained for a minimum of 7 years in secured location that is locked.

H. Internal Job Posting

POLICY

VCCI is committed to promoting from within whenever possible.

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PROCEDURE

1. All internal and external candidates will be scheduled for interview times as long as they are qualified candidates. Internal candidates selected for interviews must meet with their supervisor to inform them of their intention to interview.
2. For positions of Department Manager/Director once the Administrator has interviewed selected applicants, a decision will be made and final interviews will be conducted with the Executive Director and/or Controller, and Human Resources Director. All applicants will be informed of their candidate or non-candidate status by the Administrator. If an internal candidate is selected and accepts the position, the Administrator will inform their current supervisor and discuss the date for release to the new position. The start date should not exceed 15 working days from the date the position offered is accepted.
3. In the event of an inter-entity/department transfer, all of the above would apply. Employees interested in other opportunities with Vermont Catholic Charities, Inc., or another affiliated religious group, must contact the Human Resources department for information regarding those open positions. An agreement with current supervisor of the legal entity, must be reached, prior to any discussion/action occurring. If the move is to be lateral, it will be due to a sound business or employee developmental reason and benefit both entities/departments and the employee.
4. The employee is responsible to meet with their supervisor and develop a transition plan prior to the established transfer date.
5. The Administrator will also complete and submit the "Wage and Status Form" form to complete the hiring process. (See exhibit B)
6. All positions will be posted for a minimum of three (3) days to a maximum of five (5) days.
7. The organization has the right to move an employee into a new position without the position being posted.

I. Employee Appointment Announcement

POLICY

Employee Announcements from the manager level and up will be completed for all newly hired employees and those who are promoted.

PROCEDURE

The Administrator should provide the following information in the organizational announcement:

- Name
- Position Title
- Location
- Reporting Relationship
- Position Function
- Personal Background
- Effective Date

The memo should be of a professional manner and it can be shared via the internal email system. A copy will be placed in the employee personnel file.

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J. Involuntary Termination

POLICY

Involuntary Termination is defined as the organization’s decision to terminate its working relationship with an employee.

PROCEDURE

1. The Executive Director and Human Resources Director will make the final decision whenever possible for the involuntary termination.
2. Prior knowledge, consultation, and approval of the Human Resources Director is required prior to an employee termination. Administrators should confer with the Human Resources Director as soon as termination is contemplated. Human Resources is responsible for providing an objective review of the circumstances surrounding the proposed termination and for ensuring that the termination is handled in accordance with Organization policies and procedures.

Every employee has a right to be heard and the Human Resources Director and/or Executive Director has the responsibility to ensure that this right is respected.

3. Involuntary Termination
 - a) Administrators are responsible for conducting the termination meeting. Human Resources will meet with the terminated employee (may be via phone) and if requested, following the meeting to explain any continuing benefits or compensation and conduct an exit interview.
 - b) Involuntarily terminated employees will be paid through the date of termination and will receive their final pay in accordance with applicable laws. In agreement with Vermont law, employees must be paid within 72 hours.
 - c) The employee will also receive pay for any earned, yet unused time off per the Paid Time Off policy, provided the employee has been with the Organization for a minimum of six months.
 - d) Employees are not paid for unused holiday or discretionary time upon termination.

K. Voluntary Termination

POLICY

When an employee voluntarily terminates his/her working relationship with the Organization, that employee terminates under the Voluntary Termination policy and thus the following procedures apply. Voluntary separations are those initiated by the employee.

PROCEDURE

1. When any salaried employee voluntarily leaves the organization, the supervisor must immediately complete the Wage & Status form and send/fax/email to the Payroll Department immediately.
2. All data on the Wage and Status form must be accurate, with appropriate reasons, and the date of termination as well as the last day worked completed.
3. Payment for time off will be paid per the policy.
4. Resigning employees will receive their final pay at the next regular pay period.

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5. Benefits terminate per the policy of the plan, unless otherwise provided by law.
6. A letter of resignation (when possible) accompanied with a completed wage and status form must be forwarded to the Human Resources Department and the Payroll Department.

L. Exit Interview

POLICY

It is the Organization's policy to randomly conduct an exit interview with all employees who separate from the Organization.

- The purpose of the interview is to inform the organization as to the reasons for the resignation, to discover any employment practices that may have caused concern(s), and suggestions for improvement(s).
- From time to time employees will be scheduled for an exit interview prior to termination by the supervisor or the Department Supervisor. The results of the interviews will be provided to for review and action if warranted.
- Human Resources will periodically conduct interviews, unless circumstances are clearly inappropriate. If necessary, the interview may be conducted via telephone or via mail.

M. Rehire/Reinstatement

POLICY

VCCI will consider employment of former employee's who are eligible for re-hire and meet the qualification of the open position.

PROCEDURE

1. Former employees may be considered for rehire, pending the review and approval of Human Resources, along with other candidates, provided:
 - Performance was rated at a satisfactory level (either through formal evaluation, or observation, dependent upon tenure), and
 - The employee is qualified for the vacant position. However,
 - If an employee should leave without appropriate notice, rehire or reinstatement would be prohibited unless extenuating circumstances exist. In such instances, the Director of Human Resources would have to approve such a rehire/reinstatement.

Any re-hire who has over one year of lapsed service, will become eligible for vacation/discretionary per the Paid Time-Off Policy.

N. Adherence and Compliance For Background Checks

POLICY

VCCI and the Residential Care Homes will adhere to all regulations in terms of background checks.

**Any violations of the Employment Practices Policy will result in disciplinary action up to and including termination.*

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ATTACHMENT “B”
EMPLOYMENT SECTION: Interview Process/Application/Background Verification Policy

AGENCY OF HUMAN SERVICES
DEPARTMENT OF DISABILITIES, AGING AND INDEPENDENT LIVING
BACKGROUND CHECK POLICY
Effective: April 1, 2006

I. Introduction

Performing background checks on individuals who work with vulnerable people is a component of preventing abuse, neglect and exploitation. This policy describes when a background check is required, what the components of a background check are and what is done if a background check reveals a potential problem. Background checks supplement but do not replace reference checks. Background checks should never be relied upon as a substitute for personal contact with former employers or others who are in a position to have personal knowledge about the worker’s qualifications to work with vulnerable people.

II. Definitions

A. **“Background check”** includes all of the following:

1. A request for information about all substantiated findings of abuse, neglect, and exploitation directed to the Department for Children and Families (DCF) child abuse registry;
2. A request for information about all substantiated findings of abuse, neglect, and exploitation directed to the Department of Disabilities, Aging and Independent Living (DAIL), Division of Licensing and Protection adult abuse registry;
3. A request for information about all criminal convictions directed to the Vermont Crime Information Center (VCIC);
4. An on-line search of the Exclusions Database of the federal Department of Health and Human Services’ Office of Inspector General as www.oig.hhs.gov;
5. For volunteers or workers who will be paid to transport a person by motor vehicle, a complete Motor Vehicle Driver Record from the Vermont Department of Motor Vehicles.
6. An on-line search of the Office of Professional Regulation database to verify license status for nursing positions.

B. **“Person who receives services”** means an individual who receives support and/or services through a program administered by the Department of Disabilities, Aging and Independent Living (DAIL), including, but not limited to personal services, community supports, adult day services, housing and home supports, case management, service planning and coordination, respite care, companion care, clinical or other mental health services; crisis services, supported employment services, transportation, nutrition, nursing, and other kinds of care for which a worker receives reimbursement. Specific services include, but are not limited to:

- Adult Day Services
- Attendant Services
- Children’s Personal Care Services
- Choices for Care Waiver Services (home-based, nursing facility and enhanced residential care)

Department of Disabilities, Aging and Independent Living April 1, 2006; corrected May 1, 2006 Background Check Policy

- Developmental Disability Services

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- High Tech Services
- Homemaker Services
- Traumatic Brain Injury Waiver Services

The term includes individuals who self-, family- or surrogate-manage their services. The term does *not* include individuals who receive supports through the Flexible Family Funding program, the Dementia Respite Program, the National Family Caregiver Support Program, or Flex Funds.

C. **“Agency or provider”** means an organization that operates programs/services administered by DAIL for any “person who receives services.”

D. **“Worker”** means an individual who volunteers (including those paid a stipend or expense reimbursement) and an individual who is employed or contracted by an agency/provider (including contracted home providers, shared living providers, developmental home providers, foster care providers), surrogate, family member or person who receives services.

III. Requirements for Background Checks

A. Background checks are **required** for all workers who are paid with funds administered by DAIL and who:

1. Provide care to a person who receives services; or,
2. Manage funds or services on behalf of a person who receives services.

B. Background checks are **required** for any volunteers recruited and placed by an agency or provider who will work alone with a person who receives services.

C. Background checks are **recommended** for respite workers hired by families through the Flexible Family Funding program, the Dementia Respite Program, the National Family Caregiver Support Program (NFCSP) or Flex Funds. Families may use an Intermediary Service Organization (ISO) to complete the background check for a nominal fee. Providers and agencies are required to notify families of this option.

D. In addition to meeting the requirements of this policy, facilities or agencies that are state licensed and/or federally certified must follow abuse prevention protocols as specified in applicable state and federal regulations.

IV. Responsibility for Ensuring that Background Checks Are Completed

A. Any agency or provider employing a worker or supervising a volunteer is responsible for ensuring that the required background checks are completed, or for arranging for the required checks to be completed by an Intermediary Service Organization (ISO).

B. An Intermediary Services Organization (ISO) is responsible for ensuring that the required background checks are conducted for any workers who will be paid through the ISO. In addition to the required background checks, the ISO shall conduct any recommended background checks requested by an employer/contractor.

*Department of Disabilities, Aging and Independent Living April 1, 2006; corrected May 1, 2006
Background Check Policy Page 3 of 4*

C. Employers and contractors who will be paying workers through the ISO are responsible for obtaining the signed and completed forms necessary for the background checks to be completed.

V. Payment for Background Checks

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Applicants for employment shall not be charged for the costs of background checks. The costs of background checks are considered part of the administrative costs for an agency or provider, and are part of the contract for services of an ISO.

VI. Employment Pending Completion of Background Checks (Updated June 10, 2015)

- A. An offer of employment or contract may be made contingent upon a satisfactory background check.

VII. Periodic Updating of Background Checks

Subsequent to the initial background check, an agency or provider shall have a policy for conducting periodic random checks of workers and volunteers covered above.

VIII. Restriction upon Paying Persons with a History of Substantiated Abuse, Neglect, or Exploitation, or History of Certain Crimes (Updated June 10, 2015)

The licensee shall not have on staff a person who has had a charge of abuse, neglect or exploitation substantiated against him or her, as defined in 33 V.S.A. Chapters 49 and 69, or one who has been convicted of an offense for actions related to bodily injury, theft or misuse of funds or property, or other crimes inimical to the public welfare, in any jurisdiction whether within or outside of the State of Vermont. This provision shall apply to the manager of the home as well, regardless of whether the manager is the licensee or not. The licensee shall take all reasonable steps to comply with this requirement, including but not limited to, obtaining and checking personal and work references and contacting the Division of Licensing and Protection in accordance with 33 V.S.A. 6911 to see if prospective employees are on the abuse registry or have a record of convictions. (From 6/10/15 Memorandum from Division of Licensing and Protection-Survey & Certification Unit Re: Background Check Process)

*Department of Disabilities, Aging and Independent Living April 1, 2006; corrected May 1, 2006
Background Check Policy Page 4 of 4 of a vulnerable adult or child person while driving*

IX. Questionable Background Check Results

If a background check reveals a non-restricted conviction or motor vehicle violation, the employer may at his/her discretion hire or contract with the worker.

X. Variances (Updated June 10, 2015)

If a prospective or current employee's background check is returned with a criminal offense for actions related to bodily injury, theft or misuse of funds or property, or other crimes inimical to public welfare, the facility must keep the following on file:

- The employee's name
- The criminal offense
- The reason the facility has determined that the employee's prior criminal offense poses no foreseeable risk of abuse, neglect, or exploitation to residents (ATTACHMENT C—Background Check Notification of Verification For Licensed Facilities—completed and sent to the Division of Licensing and Protection—within 2 weeks of the completed background check for individuals that are approved for hire.)

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The facility must keep on file and available evidence, for each staff person with a criminal background, that the decision to employ the staff person was based on sound policies that prohibit mistreatment, neglect, and abuse of residents and misappropriation of resident property.

It is incumbent upon the facility to determine whether to hire the prospective employee or not. **The Division of Licensing and Protection will no longer issue waivers regarding a facility’s employment decisions for individuals with prior criminal offenses.** When onsite, a nurse surveyor may ask for evidence that background checks are being conducted and documentation of the facility’s process to determine that employees with a relevant criminal conviction do not pose a threat to residents.

A facility may never employ an individual whose name is currently on the Adult or Child Abuse Registry.

(From 6/10/15 Memorandum from Division of Licensing and Protection-Survey & Certification Unit Re: Background Check Process)

The following factors must be considered in the decision to grant or deny any variance:

- A. Age of the individual at the time of the crime or substantiation;
- B. Nature and seriousness of the crime (e.g., were there circumstantial reasons; was it related to a specific relationship, etc.);
- C. The person’s involvement with the criminal justice system and/or child or adult abuse, neglect or exploitation systems since the occurrence;
- D. The amount of time that has passed since the substantiation or conviction;
- E. Willingness of the individual to pursue expungement of any child or adult abuse substantiation;
- F. Disclosure to the person receiving services, their surrogate, and legal guardian (if there is one).

Written documentation of the decision to grant a waiver must be made stating the rationale and any conditions.

VCCI -Will not hire individuals with the following criminal charges and VCCI is not limited to this list:

- **Assault-Simple or Aggravated**
- **Felony of any type**
- **Theft, Embezzlement (any level and if a reduced charge was indicated.)**
- **Aggravated stalking Kidnapping**
- **Aggravated sexual assault Lewd and lascivious conduct**
- **Assault and robbery Simple assault**
- **Manslaughter Sexual assault**
- **Assault upon law enforcement Murder**
- **Cruelty to children Domestic assault**
- **Arson Stalking**
- **Extortion Embezzlement**
- **Abuse, neglect, or exploitation Recklessly endangering another**
- **DUI –within one year and if the employee is being hired to transport individuals.**
- **Narcotics reduced sentences or convictions of any type**
- **Elder abuse charges**
- **Arson charges/convictions**

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Any convictions not listed must be reviewed the Human Resources Department as well as the Executive Director of VCCI.

**This policy replaces, revokes, and rescinds all former policies including Human Resource Policy HR001 and 002, therefore, any modifications or changes to the utilization and administration of those policies is superseded by this new plan.*