

This policy was updated on 06/18/18. Updates are highlighted in yellow.

Background Checks

1.0 Philosophy

To protect its associates, clients, assets and reputation, Humana administers background checks consistently and in accordance with federal and state regulations, industry standards, and best practices throughout the enterprise.

2.0 Purpose

This policy establishes requirements for the consistent processes that Humana uses when conducting background checks on new or current associates, Senior Leaders, Officers, Board of Directors candidates, contractors, vendors, and any other individual requiring a background check due to the nature of their business with Humana or one of its entities.

3.0 Policy

Humana requires background checks for all candidates for employment and entities having a relationship with any aspect of the business. Background checks are conducted consistently and reviewed periodically for quality assurance.

This policy and process is subject to change or termination by Humana at any time. Humana has full and final discretionary authority for its interpretation and application. All policies, documents and handbooks are SUPERSEDED by the Humana Associate Work-Life Policies & Processes, and are no longer in effect. The Humana Associate Work-Life Policies & Processes do not supersede conflicting state or local law.

4.0 Scope

Pre-Employment/Assignment/Business Relationship Checks

All background checks, necessary licensure checks and screenings conducted on:

- candidates for employment at Humana
- candidates for employment at a company acquired by Humana
- contingent workers who will be on temporary assignment at Humana
- all suppliers of goods and services to Humana
- persons being considered for election to Humana's Board of Directors

Checks during Employment/Assignment/Business Relationship

All background checks and screenings conducted on:

- current associates during the course of their employment with Humana
- current employees of companies acquired by Humana
- contingent workers currently on temporary assignment at Humana

5.0 Guidelines

General Guidelines

- Core HR Services is responsible for ensuring the use of appropriate background check processes in all areas of the enterprise. Core HR Services' oversight includes but is not limited to ensuring the development and use of:
 - appropriate background check requirements for specific Humana roles, relationships and employment/business actions
 - appropriate review standards and follow through for results returned by Humana's third party administrators (TPA) for the Background Check process
 - periodic quality assurance measures to ensure consistent enterprise-wide background check compliance and practice
- Core HR Services consults with the Law department, other HR Partners and business unit leadership to determine appropriate, required background check components and review standards to be applied for all roles and business relationships in locations enterprise wide. It collaborates with leadership of acquired companies to identify any additional background checks requirements that need to be added to the Humana Background Check Package.
- Core HR Services monitors notifications of changes in regulatory requirements posted on the web site of its TPA and analyzes such notifications for their relevance for Humana business operations.

Pre-Employment Checks

Humana and Acquired Company New Hires and Internal Transfers

- No associate may start to work at Humana until all necessary components of the Background Check process have been successful completed. (See Exceptions, Section 7.0 in this policy.)
- No current associate moving to another Humana role may begin the new role until any additional background checks required for the new role have been completed.
- Core HR Services—On-Boarding (OB) collaborates with acquired companies to work toward alignment of Humana and acquired-company background checks for candidates receiving an offer of employment and current acquired-company employees moving to a new position in the acquired company.
- The following components comprise Humana's pre-employment background check process.

Standard Package

- Criminal Screen
- Social Security Trace
- Address History, based upon National Credit Bureau data
- Highest Level of Education Completed, listed on the Application for Employment or minimum of high school diploma or GED
- Previous employment for the past seven (7) years, listed on the Application for Employment

- Health Care Sanctions (includes Office of Inspector General)
- Terrorist Watch List
- Sex Offender Registry
- Drug Screen (10 panel)

Optional Depending on Role Requirements

- Motor Vehicle Record Check, in alignment with Humana’s [Driver Safety and Vehicle Management Program](#)
- Proof of personal vehicle liability insurance, with at least 100,000/300,000/100,000 limits in alignment with Humana’s [Driver Safety and Vehicle Management Program](#)
- Tuberculosis Screening, in alignment with Humana’s [TB Screening Program](#) criteria
- Nicotine Screening, in accordance with Humana Workplace Tobacco Program
- Credit Checks, in compliance with the Fair Credit Reporting Act
- Fingerprints Screening
- Reference Checks
- License Checks
- Physicals
- International Education/Employment/Criminal Checks

Chief Executive Officer

- Extensive, executive-level background check administered by TPA

Board of Directors

- Extensive background check administered by TPA

- Individuals will be ineligible for hire if they have been convicted of a felony related to health care or involving dishonesty or breach of trust, or who are listed as debarred, excluded or otherwise ineligible for participation in federal health care programs. Therefore, all offers must be made contingent upon the candidate not being convicted of a felony related to health care or involving dishonesty or breach of trust or being debarred, excluded or otherwise ineligible for participation in federal health care programs.

Further, if the candidate is hired and later becomes ineligible for participation in federal health care programs, Humana will remove the associate from responsibility for, or involvement with, Humana's business operations related to federal health care programs. An associate's ineligibility can lead to termination of employment.

If Humana receives notice that an associate or contractor has been convicted of a felony related to any federal health care program, or has been suspended or excluded during his or her employment or contract with Humana, Humana will remove the associate within ten (10) days of receiving such notice from responsibility for, or involvement with, Humana's business operations related to federal health care programs. An associate's conviction, suspension or exclusion can lead to termination of employment.

If Humana finds that the candidate has misrepresented or omitted important facts, Humana will not consider the candidate further. If the candidate has already been hired when Humana learns of the misrepresentation or omission, Human Resources may terminate the associate's employment immediately.

- Due to the range of **jobs** being filled, the differences in **job** responsibilities/requirements

and the varied nature of the discrepancies returned in the background check results, the Human Resources Shared Solutions Guidance Center (HRSSGC) reviews the reason for/seriousness of the result discrepancies on a case-by-case basis in relation to their impact on the hiring decision. The HRSSGC may consult the Law department and/or hiring manager as needed, when making the final hiring decision.

Entities Entering into a Business Assignment or Relationship with Humana

- Per contract with Humana, a vendor, supplier or contractor is responsible for conducting all required background check elements for any person/entity beginning a contingent work assignment or business relationship with Humana. (See [Contingent Labor](#), [Procurement](#), and [IT Contingent Labor](#) in Policy Source on Hi!)

Checks during Employment/Assignment/Business Relationship

- During the course of an associate's employment with Humana or contingent workers/vendors temporary assignment/relationship with Humana, additional background checks and screenings may be required due to either business need or issues.

I-9/ E-Verify

- All new hires are required to complete an I-9 form on their first day of employment. I-9 documentation is checked against the Department of Homeland Security and Social Security Administration records via the E-Verify website to confirm associate eligibility to work in the United States.

Drug and Alcohol Testing

Mandatory Testing for Cause

- Current associates may be required to submit to a drug/alcohol test when there are reasonable grounds to believe that the associate is under the influence of drugs or alcohol. Managers should contact Human Resources at 1-888-431-4748 (HR4U) if they believe that an associate's performance or behavior is impaired due to use of drugs or alcohol. (See [Drugs and Alcohol](#) policy in Policy Source for additional details.)

Periodic Mandatory Testing for Safety Impact Positions/Roles

- Humana reserves the right to require periodic drug and alcohol testing for associates in designated safety impact positions, roles, departments and work groups, including but not limited to associates who:
 - drive Humana vehicles, and
 - are either in direct contact with or responsible for dispensing prescription drugs.(See [Drugs and Alcohol](#) policy in Policy Source for additional details.)

Motor Vehicle Record (MVR) Check

- All associates who meet at least one of Humana's Driver Safety Program continuous MVR monitoring criteria must submit to ongoing reviews of their motor vehicle record:
 - Associates or contractors who drive a company-owned/leased vehicle for their job
 - Associates who received mileage reimbursement for 2,000 or more miles driven in the past 12-months
 - Associates who rented a vehicle four or more times during the previous calendar year for business purposes
 - Security or other personnel who may be required to drive other Humana associates to meetings, company-sponsored events, or as otherwise assigned
- Results showing violation of the [Humana Driver Safety MVR Criteria/Point System](#) will be reported to and reviewed by Human Resources (HR) and Risk Management. (See [Driver Safety and Vehicle Management Program](#) in Policy Source for additional details.)

Tuberculosis (TB) Screening

- Associates in member- or patient-facing positions/roles in areas of the business with an occupational risk for exposure to TB are required to be screened for TB:
 - annually
 - upon any incident [exposing them to TB](#). This includes incidents occurring:
 - during the course of an associate's Humana employment (hereafter referenced as Humana occupational exposure)
 - incidents occurring outside of an associate's Humana employment (non-occupational exposure)
 - at any time an associate is [symptomatic for infectious TB](#) (hereafter referenced as symptomatic associate)
- Humana's TB Screening Program draws upon the TB testing guidelines of the Center for Disease Control (CDC). (See [Tuberculosis \(TB\) Screening Program](#) in Policy Source for details of the Program.)

Terrorist Screening List

- Semi-annually, Humana compares its internal listing to verify that none of its associates, providers, members, customers, vendors, banks or brokerage firms is on the Office of Foreign Assets Control (OFAC) terrorist screening list. (See [Office of Foreign Assets Control \(OFAC\) Specially Designated Nationals \(SDN\) Screening Policy](#) in Policy Source.)

Ineligible Person List

- Humana screens associates; temporary associates; contingent labor; Board of Directors; first tier, downstream and related entities, as those terms are defined by the Centers for Medicare & Medicaid Services (including, but not limited to, contracted delegates, suppliers, sales agents, and sales agencies); participating health care providers (including, but not limited to, hospitals, pharmacies, provider groups/networks, vendors/suppliers, and other health care providers such as medical laboratories and home health agencies contracted with Humana to participate in specific plans) against the System for Awards Management (SAM) and the Health and Human Services (HHS)/Office of Inspector General (OIG) list of Excluded Individuals and Entities prior to hire or contract execution, at the time of agreement renewal, and monthly thereafter to ensure that none of these persons or entities are excluded or become excluded from participation in federal programs. (See [Ineligible Persons/Entities Screening Requirements](#) in Policy Source.)

6.0 Process

General Background Check Process Information

- All results for background checks for candidates for Humana employment are conducted by Humana's Third Party Administrator (TPA) for background checks. Results are maintained indefinitely on the TPA website and are accessible by the OB Team at any time.
- TPA notifies its business partners of regulatory requirement changes on the main page of the TPA website. Upon receipt of a TPA notification of a regulatory change requirement, Core HR Services—OB assesses whether the changed regulatory requirement has an impact for Humana. If there is an impact for Humana, OB obtains necessary legal and business approval and adds new background check criteria to Humana's Standard and/or Optional Package.
- Prior to systems integration of acquired companies, Core HR Services discusses Humana's background check requirements with the acquired company to identify gaps, move toward alignment during the interim period, and ensure adoption of a robust and business appropriate Background Check package that will meet business needs at the time of full systems integration.
- All background checks initiated by Core HR Services—OB are monitored for completion. A sampling of background checks not initiated by OB will be audited annually by OB. The percentage audited can vary based upon business need.

Pre-Employment/Assignment/Business Relationship Background Check Processes

New Hires

1. New Hire electronically accepts offer, verifies the accuracy and completeness of his/her application information.
2. Core HR Services—Onboarding Team (OB) notifies the Background Check TPA to run the standard background package along with any additional checks that are required for the role.
3. TPA sends background check authorization and drug screen information to the new hire

with notification of 48-hour completion requirement.

4. TPA reports background check results to OB, typically within 5-8 business days.
5. OB reviews results and if discrepancies arise, OB contacts an Associate Relations Consultant (AR).

Second-level review – OB sends new hire e-Pre-Adverse Letter along with their background check report. NH has 5-business days to respond with explanation and/or documentation regarding discrepancies. HRSSGC reviews NH's explanation/documentation against Humana's Hiring Guidelines. Contacts Law department and/or the hiring manager as needed to consider the relevance of discrepancies in relation to the role.

6. HRSSGC makes the hiring decision and notifies NH. If the decision is not to hire, AR sends Adverse Letter electronically, notifying NH that the offer is rescinded. Once the offer is rescinded, OB completes the termination in Workday which notifies the hiring manager. If the decision is to hire, OB provides NH orientation information.

Internal Transfers

1. Internal Transfer (IT) electronically accepts offer.
2. OB notifies the Background Check TPA to run any additional background elements required for their new role—i.e., elements that weren't required for their previous Humana role.
3. OB notifies the Background Check TPA to run any additional checks that are required for the new role.
4. Internal Transfer electronically accepts offer.
5. OB team runs checks required by the new role that were not completed as part of the initial background.
6. OB notifies the Background Check TPA to run any additional checks that are required for the new role.
7. If needed, OB sends IT drug screen location information and notification of 48-hour completion requirement.
8. TPA reports background check results to OB, typically within 5-8 business days.
9. OB reviews results and if discrepancies arise, OB contacts an Associate Relations Consultant (AR).

Second-level review – OB sends IT e-Pre-Adverse Letter along with their background check report. IT has 5-business days to respond with explanation and/or documentation regarding discrepancies. AR reviews IT's explanation/documentation against Humana's Hiring Guidelines. Contacts Law department and/or the hiring manager as needed to consider the relevance of discrepancies in relation to the role.

10. AR makes the hiring decision and notifies IT. If the decision is not to hire, AR sends Adverse Letter electronically, notifying IT that the offer is rescinded. AR notifies Recruiter, who updates Workday. If the decision is to hire, OB notifies IT.

CEO Background and Drug Screen

1. Completed by a TPA.
2. Reviewed for discrepancies by Legal.

Board of Directors Background check

1. Completed by TPA.
2. Reviewed for discrepancies by Legal.

Contingent Labor and Business Relationships

1. Core HR Services collaborates with Procurement to establish pre-assignment/business relationship background check requirements for vendors, suppliers and contingent labor.
2. Per contract, the vendor, supplier or contractor (employer) is responsible for conducting all required background check elements for any person/entity beginning a contingent work assignment or business relationship with Humana. (See [Contingent Labor](#), [Procurement](#), and [IT Contingent Labor](#) in Policy Source on Hi!)
3. As required in the contract with the vendor/supplier/contractor, the employer sends any discrepancies returned in the background check on a contingent worker (CW) to OB.
4. An Associate Relations Consultant (AR) reviews the CW's discrepancies against Humana's Hiring Guidelines. Contacts Law department and/or the hiring manager, as needed, to consider the relevance of discrepancies in relation to the role.
5. AR notifies the vendor/contractor of whether the CW can or cannot begin the Humana assignment.

Background Checks During Employment/Assignment/Business Relationship Processes*I-9/E-Verify*

1. All new hires are complete an I-9 form on their first day of employment
2. OB or designee reviews identification documentation provided by new hire for appropriateness. OB or designee will complete section 2 of the I-9 form and complete the E-Verify process. If additional documentation is required, OB or designee notifies associate to provide within 3 days of start date.
3. OB reviews all associate information entered into E-verify to confirm the associate's ability to legally work in the United States.
4. If associate is ineligible to work in the United States, OB notifies the hiring manager and works with the Hiring Manager to terminate the associate's employment.

Investigations

1. OB runs additional, appropriate checks required as a result of an investigation by HR Shared Services (HRSS), Associate Relations (AR) or the Law Department.
2. OB and HRSS/AR review and analyze results.
3. HRSS/AR completes the investigation.

Driver Safety Program ongoing checks

HRSSGC manages in alignment with Humana's Driver Safety and Vehicle Management policy the ongoing checks required for in-scope associates. (See [Driver Safety and Vehicle Management](#) policy in Policy Source for process details.)

Drug and Alcohol Testing: ongoing checks for Mandatory Testing for Cause; Periodic Mandatory Testing for Safety Impact Positions/Roles

- HRSSGC manages in alignment with Humana's Drug and Alcohol policy the ongoing checks required for Mandatory Testing for Cause; Periodic Mandatory Testing for Safety Impact Positions/Role. (See [Drugs and Alcohol](#) policy in Policy Source for process details.)

Tuberculosis Screening Program ongoing checks

- HRSSGC manages in alignment with Humana's Tuberculosis Screening Program policy the ongoing checks required for in-scope associates. (See [Tuberculosis \(TB\) Screening Program](#) policy in Policy Source for process details.)

Terrorist Screening List ongoing checks

- Semi-annually, the Compliance organization manages the comparison of Humana's internal listings to verify that none of its associates, providers, members, customers, vendors, banks or brokerage firms is on the Office of Foreign Assets Control (OFAC) terrorist screening list. (See [Office of Foreign Assets Control \(OFAC\) Specially Designated Nationals \(SDN\) Screening Policy](#) in Policy Source.)

Ineligible Person List ongoing checks

- The Compliance organization manages the monthly screening of associates; temporary associates; contingent labor; Board of Directors; first tier, downstream and related entities, as those terms are defined by the Centers for Medicare & Medicaid Services (including, but not limited to, contracted delegates, suppliers, sales agents, and sales agencies); participating health care providers (including, but not limited to, hospitals, pharmacies, provider groups/networks, vendors/suppliers, and other health care providers such as medical laboratories and home health agencies contracted with Humana to participate in specific plans) against the System for Awards Management (SAM) and the Health and Human Services (HHS)/Office of Inspector General (OIG) list of Excluded Individuals and Entities to ensure that none of these persons or entities are excluded or become excluded from participation in federal programs. (See [Ineligible Persons/Entities Screening Requirements](#) in Policy Source.)

7.0 Exceptions

- Pending letters are provided to new hires in circumstances where it is beneficial to the business to have them start work even if part of their background report is pending, including, but not limited to education verification. Pending letters require candidates to acknowledge that their background is pending and if derogatory information is received their employment may be subject to termination.

8.0 Attachments

N/A

9.0 Access/Information

- Associates and leaders should contact HR4U at 1-888-431-4748 with questions regarding Humana’s Background Check policy.

10.0 Related Topics

- Employment Offer
- Contingent Labor
- Driver Safety and Vehicle Management Program
- Drugs and Alcohol
- Executive Order Governing Terrorist Screening
- Ineligible Persons/Entities Screening Requirements
- Investigations
- Procurement
- Tuberculosis Screening Program