

Workforce Background Check

Information and Provider Responsibilities

Adam Krajniak Bureau of Community and Health Systems





APRIL 1, 2006

- MCL 333.20173a (Public Health Code)
- MCL 330.1134a (Mental Health Code)
- MCL 400.734b (Adult Foster Care Licensing Act)

Homes for the Aged

Adult Foster Care Facilities

Nursing Homes
County Medical Care Facilities
Hospices
Hospitals with Swing Bed Services
Medicare Certified Home Health Agencies
Psychiatric Hospitals/Inpatient Units

Staffing/Contract Agencies (verified)



STATE AND FBI FINGERPRINT-BASED BACKGROUND CHECK

TIERED SYSTEM OF EXCLUSIONS

1 YEAR TO PERMANENT

Section (1) of laws provides exclusionary offenses/time frames. Prior legal guide should not be used due to changes in laws/policies

NGRI STATUS

SUBSTANTIATED FINDINGS OF ABUSE, NEGLECT, OR MISAPPROPRIATION OF PROPERTY REGISTRY CHECKS:

Office of Inspector General (OIG)

Sanctioned Provider List (SPL)

Nurse Aide Abuse Registry (NAR)

Public Sex Offender Registry (PSOR)

Offender Tracking Information System (OTIS)



RAPBACKS

REQUIREMENT OF THE BACKGROUND CHECK LAWS

PROVIDES FOR CONTINUOUS MONITORING OF WORKFORCE (STATE OF MI ONLY)

WHEN A RECORD IS SUBMITTED TO MSP BY A LAW ENFORCEMENT AGENCY, PROSECUTOR, OR COURT MATCHING THE FINGERPRINTS ON FILE, MSP SENDS ELECTRONIC NOTIFICATION OF SUCH TO THE BACKGROUND CHECK UNIT

THE WORKFORCE BACKGROUND CHECK UNIT WILL SEND YOU NOTIFICATION OF ANY FELONY ARREST OR CHARGE (ARRAIGNMENT), OR EXCLUSIONARY CONVICTION

A FELONY ARREST/CHARGE IS NOT CAUSE FOR TERMINATION

IF DISQUALIFIED, THE EMPLOYEE IS NO LONGER ELIGIBLE TO WORK IN A DIRECT ACCESS/DIRECT SERVICES POSITION



THE NUMBER OF THE DAY IS...

SINCE APRIL 1, 2006:

1,218,325 - TOTAL FINGERPRINTS TAKEN

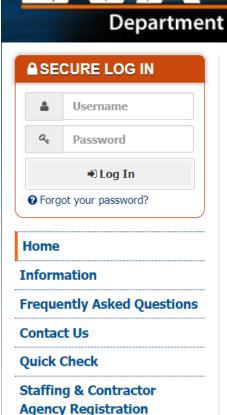
13,532 – REGISTRY CHECK EXCLUSIONS

14,429 – EXCLUSIONS UPON INITIAL BACKGROUND CHECK

13,571 – RAPBACK EXCLUSIONS



miltcpartnership.org



Department of Licensing and Regulatory Affairs

The Department of Licensing and Regulatory Affairs acknowledges the support and involvement of the provider

MICHIGAN.GOV

Michigan's Official

· To promote and protect the health and safety of Michigan's vulnerable populations, and

community, collaborating partners, advocates, stakeholders, and other concerned citizens:

• To facilitate the background check process by creating a comprehensive, secure online system that encourages compliance.

Bureau of Community and Health Systems

Covered Providers

- Nursing Homes
- County Medical Care Facilities
- Hospices
- Hospitals with Swing Bed Services
- · Medicare Certified Home Health Agencies
- Psychiatric Hospitals/Inpatient Units
- Adult Foster Care Facilities
- · Homes for the Aged





Home

Information

Frequently Asked Questions

Contact Us

Quick Check

Staffing & Contractor Agency Registration

I NEWS FLASH

FINGERPRINTING FEE
INCREASE JANUARY 1, 2019 12/20/2018

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Information on the Background Check Program

As new information is developed, it will be made available on this Web page. Please check back often.

Forms

- Account Set-up Fee Payment Form (Staffing Agencies and Independent Contractors) (Updated 06/19/2017)
- Consent and Disclosure Form (Updated 02/04/2016)
- LARA Redetermination Request Form (Updated 06/24/2016)

Communications

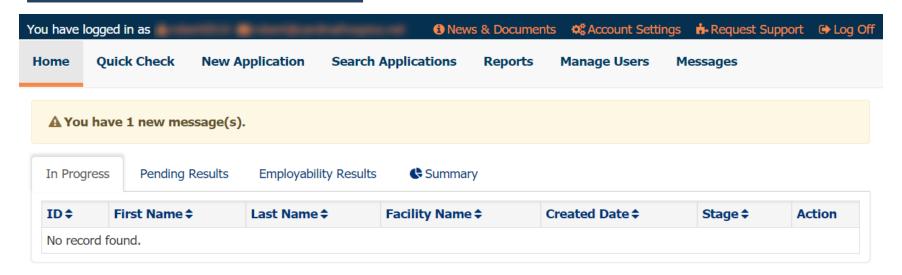
- How to Verify a Staffing Agency/Contractor (Updated 06/19/2017)
- IdentoGO by IDEMIA Escrow Account Packet (Updated 07/19/2018)
- IdentoGO by IDEMIA Non Resident Card Scan Processing Procedures (Updated 10/31/2018)

Authorizing Statutes

MCLA 333.20173a, 333.20173b, 330.1134a, 400.734b, 400.734c



DASHBOARD



Quick Check: ALLOWS CHECK OF RELEVANT REGISTRIES WITHOUT BEGINNING A NEW APPLICATION

New Application: CLICK TO BEGIN A NEW BACKGROUND CHECK

Search Applications: SEARCH FOR ALL BACKGROUND CHECKS ENTERED INTO THE ACCOUNT

Manage Users: ALLOWS BACKGROUND CHECK ACCOUNT ADMINISTRATOR TO CREATE/DISABLE

SUBUSER ACCOUNTS

<u>In Progress</u>: SHOWS BACKGROUND CHECKS YOU ARE CURRENTLY WORKING ON PRIOR TO FINGERPRINTING

Pending Results: SHOWS BACKGROUND CHECKS FOR WHICH YOU ARE AWAITING RESULTS AFTER SENDING

THE APPLICANT FOR FINGERPRINTING

Employability Results: WHERE YOU CAN LOCATE COMPLETED BACKGROUND CHECKS AWAITING A FINAL

HIRING DECISION



CAN I USE A DIFFERENT BACKGROUND CHECK SYSTEM?

NO! COVERED PROVIDERS <u>MUST</u> USE THE miltcpartnership.org WORKFORCE BACKGROUND CHECK SYSTEM

See Frequently Asked Questions on the miltcpartnership.org homepage for information about system access

STAFFING AGENCIES/CONTRACTORS WHO CONTRACT WITH COVERED PROVIDERS <u>MAY</u> CREATE AN ACCOUNT WITHIN THE miltcpartnership.org SYSTEM

Requires a one-time account registration fee of \$100.00

Requires verification by a covered provider

Allows for the secure "sharing" of background check results with covered providers

See Staffing and Contractor Agency Registration on the miltcpartnership.org homepage for further information/to complete registration

HOWEVER, STAFFING AGENCIES/CONTRACTORS ARE NOT REQUIRED TO CREATE A BACKGROUND CHECK ACCOUNT. IF THEY DO NOT, IT IS THE COVERED PROVIDER'S LEGAL RESPONSIBILITY TO COMPLETE THE BACKGROUND CHECK ON.....



WHO MUST GET A BACKGROUND CHECK?

THE BACKGROUND CHECK LAWS REQUIRE COVERED PROVIDERS TO CONDUCT A FINGERPRINT-BASED BACKGROUND CHECK ON PERSONS THEY ARE:

- EMPLOYING
- INDEPENDENTLY CONTRACTING WITH
 - GRANTING CLINICAL PRIVILEGES TO

... WHO REGULARLY HAVE DIRECT ACCESS OR PROVIDE DIRECT SERVICES TO PATIENTS OR RESIDENTS OF THE COVERED FACILITY/AGENCY

THE LAWS AUTHORIZE <u>ONLY</u> THESE PERSONS TO BE BACKGROUND CHECKED IN THE miltcpartnership.org SYSTEM

"Direct Access" means, "... access to a patient or resident or to a patient's or resident's property, financial information, medical records, treatment information, or any other identifying information."



MOST STUDENTS AND VOLUNTEERS DO NOT FALL UNDER THE BACKGROUND CHECK LAWS!

The background check laws do not require or authorize students to get a fingerprint based background check. Even if a student has "direct access" to patients or residents as a part of their educational program, students should only get a fingerprint based background check if they are also being granted clinical privileges by your facility or agency.

The background check laws do not require or authorize most volunteers to get a fingerprint based background check. Volunteers should only get a fingerprint based background check if they are also being granted clinical privileges by your facility or agency or if they are a hospice volunteer and meet the definition of employee as outlined in 42 CFR 418.3.

See Frequently Asked Questions on the miltcpartnership.org homepage



HOW DO I GET SOMEONE FINGERPRINTED?

YOU <u>MUST</u> OBTAIN A COMPLETED AND SIGNED CONSENT AND DISCLOSURE FORM FROM ALL APPLICANTS PRIOR TO BEGINNING THE BACKGROUND CHECK PROCESS - <u>THIS INCLUDES</u> CONTRACTED STAFF

Available under Information on the miltcpartnership.org homepage

MUST USE STATE CONTRACTED FINGERPRINT VENDOR: IdentoGO by IDEMIA

APPOINTMENTS MUST BE SCHEDULED FROM WITHIN YOUR miltcpartnership.org BACKGROUND CHECK ACCOUNT FOLLOWING THE PROVIDED PROMPTS

FINGERPRINTING ARRANGED OUTSIDE OF THE miltcpartnership.org SYSTEM OR CONDUCTED FOR A DIFFERENT PURPOSE, EG, HEALTHCARE LICENSURE, EDUCATION EMPLOYMENT, <u>CANNOT</u> BE USED

FOR INSTRUCTIONS ON FINGERPRINTING OUT-OF-STATE APPLICANTS SEE "IdentoGO by IDEMIA NON RESIDENT CARD SCAN PROCESSING PROCEDURES" UNDER "INFORMATION" ON THE miltcpartnership.org HOMEPAGE



HOW MUCH DOES THE BACKGROUND CHECK COST?

\$51.50 - RATE INCREASED \$1.25 BY FBI EFFECTIVE JANUARY 1, 2019

APPLIES TO ALL COVERED PROVIDERS AND STAFFING/CONTRACT AGENCIES WITH THE EXCEPTION OF ADULT FOSTER CARE FACILITIES AND HOMES FOR THE AGED

333.20173A(4) AMENDED EFFECTIVE FEBRUARY 11, 2018

AFTER OCTOBER 1, 2018 THE STATE WILL PAY FOR 40 BACKGROUND CHECKS PER YEAR FOR HOME FOR THE AGED FACILITIES WITH FEWER THAN 100 BEDS, AND FOR 50 BACKGROUND CHECKS PER YEAR FOR HFA WITH 100 BEDS OR MORE

AWAITING IMPLEMENTATION...

BACKGROUND CHECK LAWS STATE THAT PROVIDERS <u>CANNOT</u> REQUEST REIMBURSEMENT FOR THE COST OF THE BACKGROUND CHECK AND THAT PROSPECTIVE WORKERS <u>CANNOT</u> BE CHARGED FOR THE COST OF THE BACKGROUND CHECK



HOW DO I PAY FOR THE BACKGROUND CHECK?

CREDIT CARD ONLINE, BY FOLLOWING PROMPTS WITHIN THE miltcpartnership.org SYSTEM

MONEY ORDER OR COMPANY CHECK AT THE FINGEPRINTING APPOINTMENT

ESCROW ACCOUNT

See "IdentoGO by Idemia Escrow Account Packet" under Information on the miltcpartnership.org homepage

ALL QUESTIONS REGARDING APPOINTMENT SCHEDULING AND PAYMENT SHOULD BE DIRECTED TO IdentoGO by IDEMIA AT 866-226-2952



CAN I ACCEPT AN "IS ELIGIBLE" LETTER FROM A DIFFERENT FACILITY OR STAFFING AGENCY?

NO! EACH COVERED FACILITY/AGENCY MUST BE ABLE TO PROVIDE A LETTER WHICH STATES THAT THE EMPLOYEE, INDEPENDENT CONTRACTOR, OR PERSON BEING GRANTED CLINICAL PRIVILEGES IS ELIGIBLE TO WORK IN THEIR FACILITY/AGENCY

THE ELIGIBILITY DETERMINATION LETTER <u>MUST</u> CONTAIN THE NAME OF THE SPECIFIC FACILITY OR AGENCY AT WHICH THE PERSON IS WORKING

EVEN IF YOUR COMPANY OWNS SEVERAL DIFFERENT FACILITIES THE PERSON MUST OBTAIN A BACKGROUND CHECK UNDER THE ACCOUNT OF <u>EACH SPECIFIC</u> <u>LOCATION/FACILITY AT WHICH THEY ARE WORKING</u>

RAPBACKS! OUR OFFICE NEEDS TO KNOW WHERE TO SEND ARREST AND EXCLUSION NOTIFICATIONS



DOES EACH NEW BACKGROUND CHECK REQUIRE A NEW FINGERPRINTING?

NOT NECESSARILY.... THE milctpartnership.org SYSTEM IS DESIGNED TO PROVIDE A VALID "SHARED" RESULT WHEN AVAILABLE AT NO ADDITIONAL COST TO THE PROVIDER

IN MOST CASES A FINGERPRINT RESULT CAN BE USED FOR 12 MONTHS FOLLOWING THE DATE OF A PRIOR FINGERPRINTING UNDER THIS PROGRAM

Example: An applicant is printed for a covered provider on December 12, 2017. They can apply to work at a different covered facility/agency without needing to be reprinted until December 12, 2018.

REQUIRES MICHIGAN RESIDENCY FOR THE PRIOR 12 MONTHS

REQUIRES THAT THE PRIOR FINGERPRINTING WAS COMPLETED UNDER THIS PROGRAM (PRINTING FOR ANOTHER PURPOSE, E.G., HEALTHCARE LICENSURE, EDUCATION EMPLOYMENT, ETC. CANNOT BE USED)

NEW PRINTING IS NOT REQUIRED IF EMPLOYEE MAINTAINS EMPLOYMENT AT SAME FACILITY/AGENCY, BUT IS REQUIRED IF APPLYING AT NEW FACILITY/AGENCY IN ORDER TO OBTAIN UPDATED FBI RESULTS



HOW DO I OBTAIN A SHARED RESULT?

LOG IN TO YOUR BACKGROUND CHECK ACCOUNT

CLICK ON New Application TO BEGIN THE BACKGROUND CHECK PROCESS

COMPLETE THE REGISTRY CHECKS AND MAKE YOUR PRELIMINARY HIRING DECISION
THIS IS REQUIRED AS REGISTRY CHECK INFORMATION IS NOT INCLUDED IN RAPBACKS

IF A SHARED RESULT IS AVAILABLE YOU WILL BE PROVIDED WITH THE ELIGIBILITY DETERMINATION LETTER AT THIS TIME (RATHER THAN BEING PROMPTED TO SCHEDULE A FINGERPRINTING APPOINTMENT)

MAKE YOUR FINAL HIRING DECISION



HOW DO I OBTAIN A SHARED RESULT FROM A STAFFING AGENCY/CONTRACTOR?

LOG IN TO YOUR BACKGROUND CHECK ACCOUNT

CLICK ON New Application TO BEGIN THE BACKGROUND CHECK PROCESS

CLICK ON Switch to Contracted Staff

ENTER THE APPLICANT'S CONFIRMATION ID AND DATE OF BIRTH (OBTAIN FROM STAFFING AGENCY/CONTRACTOR)

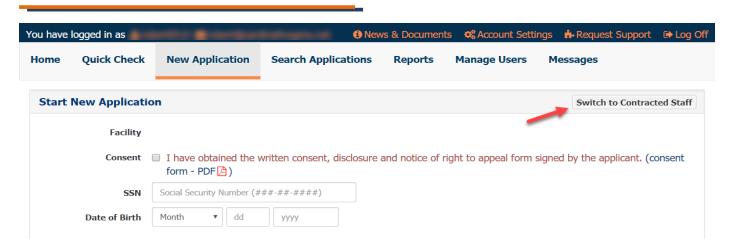
COMPLETE REGISTRY CHECKS AND MAKE YOUR PRELIMINARY HIRING DECISION

YOU WILL BE PROVIDED WITH THE ELIGIBILITY DETERMINATION LETTER CONTAINING YOUR FACILITY/AGENCY NAME AT THIS TIME

MAKE YOUR FINAL HIRING DECISION

THIS PROCESS ONLY WORKS WHEN OBTAINING RESULTS FROM A STAFFING AGENCY/CONTRACTOR AND WILL NOT WORK TO OBTAIN RESULTS FROM ANOTHER COVERED PROVIDER





You have I	ogged in as	-	3 N	ews & Documen	ts 👯 Account Setti	ngs 🔥 Request Suppo	ort 🕩 Log Off				
Home	Quick Check	New Application	Search Applications	Reports	Manage Users	Messages					
Start (Contracted Sta	aff Application				Switch t	to Employee				
This process allows you to register contracted staff and independent contractors who have been fingerprinted by his or her employing agency. The contracted staff will provide a confirmation ID to allow you to access the employability result and conduct registry checks. You do not have to request a new fingerprint-based check, but you will receive information through the RAPback about subsequent felony arrest or convictions for this individual.											
	Facility										
	Consent I have obtained the written consent, disclosure and notice of right to appeal form signed by the applicant. (consent form - PDF (2))										
	Confirmation ID	Confirmation ID									
	Date of Birth	Month ▼ dd	ууууу								



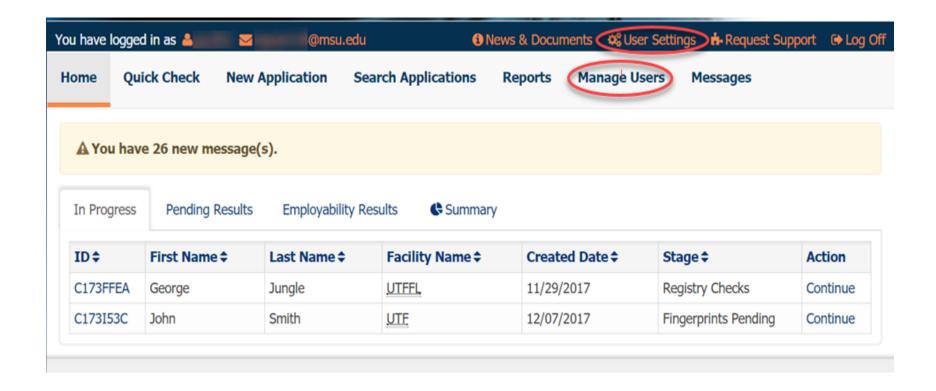
MORE NUMBERS!

SINCE IMPLEMENTATION IN 2011:

- 238,323 –NUMBER OF SHARED RESULTS
- 15,486 NUMBER OF SHARED RESULTS FROM SA/CONTRACTORS
- 8.7 MILLIONS OF DOLLARS IN SAVINGS FOR PROVIDERS
- 4.0 MILLIONS OF DOLLARS IN SAVINGS FOR THE STATE OF MI



OTHER USER INFORMATION AND RESPONSIBILITIES





USER SETTINGS

EACH COVERED FACILITY/AGENCY HAS IT'S OWN BACKGROUND CHECK ACCOUNT THAT REMAINS THE SAME REGARDLESS OF CHANGE OF NAME OR CHANGE OF OWNERSHIP

EACH BACKGROUND CHECK ACCOUNT HAS A PRIMARY ADMINISTRATOR. THE PRIMARY ADMINISTRATOR IS RESPONSIBLE FOR ACCOUNT SECURITY! THE PRIMARY ADMINISTRATOR ACCOUNT SHOULD ALWAYS BE IN USE!

THE NAME AND EMAIL ADDRESS ON THE PRIMARY ADMINISTRATOR ACCOUNT DETERMINE WHO WE SEND OUR CORRESPONDENCE TO AND SHOULD DENOTE THE PERSON RESPONSIBLE FOR THE BACKGROUND CHECK

THE PRIMARY ADMINISTRATOR ACCOUNT LOG IN INFORMATION IS UNKNOWN, ACCESS TO THE ACCOUNT MUST BE REQUESTED IN WRITING BY THE <u>FACILITY</u> ADMINISTRATOR ON COMPANY LETTERHEAD FAX REQUESTS TO 517-241-0093

NAME, USERNAME, PASSWORD, EMAIL ADDRESS, ETC. CAN BE UPDATED BY CLICKING ON USER SETTINGS.



MANAGE USERS

ALLOWS THE PRIMARY ADMINISTRATOR TO CREATE/DISABLE SUB-USER ACCOUNTS AND VERIFY STAFFING/CONTRACTOR AGENCIES

SUB-USER ACCOUNTS SHOULD BE DISABLED IMMEDIATELY IF THE SUB-USER TERMINATES EMPLOYMENT OR NO LONGER REQUIRES ACCESS TO THE SYSTEM!

WHEN A SUB-USER ACCOUNT IS DISABLED THE PRIMARY ADMINISTRATOR EMAIL ADDRESS BECOMES THE DEFAULT FOR EMPLOYABILITY DETERMINATIONS, RAPBACKS, REDETERMINATIONS

STAFFING/CONTRACTOR AGENCIES MUST BE VERIFIED BY A LICENSED PROVIDER TO CREATE A BACKGROUND CHECK ACCOUNT

Directions located under Information on miltcpartnership.org homepage

STAFFING AGENCIES/CONTRACTORS <u>ONLY</u> SHOULD REGISTER USING THE STAFFING AND CONTRACTOR AGENCY REGISTRATION FUNCTION



MISCELLANEOUS

ALWAYS VERIFY CORRECT SSN AND DOB

BE CERTAIN THAT APPLICANT INFORMATION IN SYSTEM MATCHES THE INFORMATION ON THE PICTURE ID THAT THE APPLICANT WILL BE TAKING TO THE FINGERPRINTING APPOINTMENT

A VALID GOVERNMENT ISSUED PICTURE IDENTIFICATION IS REQUIRED TO GET FINGEPRINTED (DRIVER'S LICENSE, STATE ID, MILITARY ID, PASSPORT)

FOR APPLICANTS WITH FOREIGN ADDRESSES, USE THE ADDRESS OF YOUR FACILITY/AGENCY



REGISTRY CHECKS

- OFFICE OF INSPECTOR GENERAL EXCLUSIONARY
- SANCTIONED PROVIDER LIST EXCLUSIONARY
- NURSE AIDE ABUSE REGISTRY EXCLUSIONARY
- PUBLIC SEX OFFENDER REGISTRY EXCLUSIONARY
- OFFENDER TRACKING INFORMATION SYSTEM MAY OR <u>MAY NOT</u> EXCLUDE DEPENDING UPON OFFENSE OF CONVICTION AND LENGTH OF TIME SINCE DISCHARGE

SEE SECTION (1) OF BACKGROUND CHECK LAWS

CONDITIONAL HIRE

APPLICANTS MAY BE CONDITIONALLY HIRED PRIOR TO RECEIPT OF THE BACKGROUND CHECK RESULT IF:

NO DIRECT ACCESS/DIRECT SERVICES WITHOUT SUPERVISION BY A PERSON WHO HAS PASSED THIS BACKGROUND CHECK

IF NO SUPERVISION:

ICHAT SEARCH WITH NO EXCLUSIONS

12 MONTHS MICHIGAN RESIDENCY
FINGERPRINTED WITHIN 10 BUSINESS DAYS OF START DATE



REDETERMINATIONS

DISQUALIFIED APPLICANTS MAY REQUEST A REDETERMINATION OF THEIR EMPLOYMENT ELIGIBILITY BASED UPON:

INACCURACY IN CRIMINAL HISTORY RECORD
CONVICTION BEING EXPUNGED/SET ASIDE/REMOVED FROM RECORD

REDETERMINATION REQUEST FORM MAILED TO APPLICANT WITH EXCLUSION LETTER

ALSO AVAILABLE ON miltcpartnership.org HOMEPAGE UNDER INFORMATION

COURT DOCUMENTATION MUST ACCOMPANY THE REQUEST FORM

APPLICANT DETERMINES WHETHER RESPONSE IS SENT TO EMPLOYER



REDETERMINATION RESPONSE

NOTIFICATION SENT VIA WEB APPLICATION AND REGULAR MAIL TO APPLICANT AND EMPLOYER (IF REQUESTED BY APPLICANT)

THREE OPTIONS:

DENIED – NOT ELIGIBLE TO WORK

GRANTED – ELIGIBLE TO WORK

MAY IMMEDIATELY RETURN TO WORK
DOES NOT REQUIRE NEW BACKGROUND CHECK
MAKE NEW FINAL HIRING DECISION IN SYSTEM

GRANTED – NEW BACKGROUND CHECK REQUIRED

NO LONGER DISQUALIFIED

NEW BACKGROUND CHECK REQUIRED TO DETERMINE

CURRENT EMPLOYMENT ELIGIBILITY



HOMEWORK

CHECK YOUR MESSAGES

MAKE SURE YOUR PRIMARY ADMINISTRATOR ACCOUNT IS IN USE

PLEASE MAKE YOUR FINAL HIRING DECISIONS

THERE ARE OVER 25,000 APPLICATIONS IN THE BACKGROUND CHECK SYSTEM AWAITING YOUR RESPONSE TO AN ELIGIBILITY DETERMINATION

MANY OF THESE PEOPLE MAY NOT BE ELIGIBLE TO WORK



HOMEWORK

PLEASE RESIGN EMPLOYEES WHO ARE NO LONGER WORKING

RESIGN EMPLOYEES UPON TERMINATION OF EMPLOYMENT

TURNS OFF RAPBACKS
ENSURES NO FURTHER NOTIFICATIONS RECEIVED

C141XJLY	Test	Test	03/12/1980	UTF	Hired	Continue						
C141ZQPY	Test	Johnson	01/01/1980	UTFFL.	Withdrawn	Continue						
Update Hiring Decision												
The employee does not work at this facility any more.												
	⊘ Update Hirin	g Decision										

CLICK ON CONFIRMATION ID OR ON 'CONTINUE.' AT BOTTOM OF THE APPLICANT PROFILE CLICK TO SHOW THAT THE EMPLOYEE IS NO LONGER EMPLOYED, THEN UPDATE HIRING DECISION





CONTACT US

877-718-5547, OPTION 3

CLICK ON 'CONTACT US' ON THE miltcpartnership.org HOMEPAGE TO SUBMIT AN ONLINE SUPPORT CASE

WHEN LOGGED IN, CLICK ON 'REQUEST SUPPORT' TO SUBMIT AN ONLINE SUPPORT CASE



Long Term Care Eligibility Determination Letter Audit

Barbara Zabitz, RDN, MEd Health Care Surveyor





Employees whom you have hired who have regular contact with residents

Who is included in this audit?



Contracted employees who have regular contact with residents or who have access to residents' medical records



Individuals to whom you have granted clinical privileges

What is meant by "clinical privileges"?

- No official definition in the Public Health Code
- Common sense definition: An individual that a facility allows to make notations in residents' clinical records and/or is allowed to write orders, that is a facility's medical professionals.
- This would exclude "consultant physicians" or other practitioners who provide their findings to the referring practitioner outside of the clinical record with the expectation that the referring practitioner will write any orders.

What is meant by "regular" access or contact?

- No official definition for frequency of contact
- Direct access means "access to a patient or resident or to a patient's or resident's property, financial information, medical records, treatment information, or any other identifying information."
- No obligation to obtain eligibility determination letters for lawn care staff, for example
- Facilities might not be obligated to obtain eligibility determination letters for employees who spend 100% of their time in a "service wing" or basement, but the facility should consider the location where the employee enters the building or where the employee takes lunch or other breaks.

What is involved in the audit?

Using a randomly chosen sample of employees, we will ask for eligibility determination letters (AKA "fingerprint result letters") that associate the employee with your specific facility.





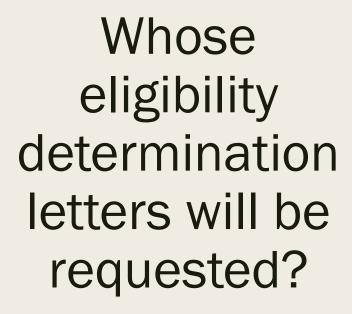
MICHIGAN WORKFORCE BACKGROUND CHECK

December 11, 2018

900 COOK ROAD GROSSE POINTE WOODS, MI 48236

Subject: THE RIVERS HEALTH & REHAB CENTER OF GROSSE POINTE - 021

The applicant/employee IS ELIGIBLE for employment in a job that involves direct access or provides direct services to a patient or resident in a nursing home, county medical care facility, hospice, hospital that provides swing bed services, inpatient psychiatric hospital or unit, certified home health agency, home for the aged or adult foster care facility.











New hires including interim staff

Employees with the oldest seniority date

Medical director

Attending physicians and medical extenders







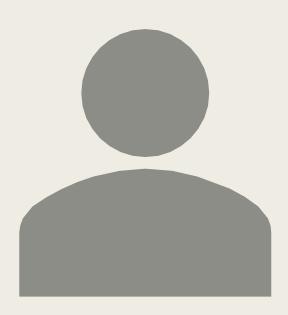
Corporate consultants

Therapy staff

Contracted Food Service, Housekeeping, Laundry and/or Maintenance services

What other contracted services could be included?

- Dentist, podiatrist, vision, hearing, mental health services
- Consultant Dietitian
- Consultant Pharmacist
- Agency Staff
- Contracted security, contracted transportation companies
- X-ray technicians
- Phlebotomists
- Hair dressers, barbers, nail technicians
- Massage therapists, music therapists, if not volunteers



Whose eligibility clearances will we NOT ask for?

- Volunteers or students (unless granted clinical privileges).
- Hospice staff
- Contracted employees who come into your facility only intermittently (for example, less than 3 times in 6 weeks).



Using the MILTCPartnership.org website

Learn to use the Contracting Agency Screen!!



Tips for the Contracting Agency screen

- If the vendor has registered as a "Contracting Agency," all the facility needs is the employee's confirmation number, date of birth, and the employee's consent for background check.
- Even if the employee is found on the Contracting Agency screen, the facility must still review the 5 registries.

BEWARE!!

- Not all vendors have registered as a "Contracting Agency."
- It is each facility's responsibility to determine the status of their venders in regards to MILTCPartnership.org
- If a vendor has not registered as a Contracting Agency, it is the facility's responsibility to ensure that EACH contracted employee is entered in the database so that the facility can generate an eligibility determination letter that associates the employee with the specific facility!!

Questions & Answers

Bureau of Community and Health Systems

Ottawa Building, 1st Floor

611 W Ottawa Street

Lansing, MI 48933

State Licensing main line: (517) 335-1980

www.michigan.gov/bchs

Thank you for your efforts to provide quality community & health care services to Michigan residents.

