

## XXXII. AURA PRE-EMPLOYMENT SCREENING POLICY

### A. AURA PRE-EMPLOYMENT SCREENING POLICY

To ensure that individuals who join AURA are well qualified and have a strong potential to be productive and successful and to help ensure that AURA maintains a safe and productive work environment, AURA will perform certain basic pre-employment screenings on all newly hired staff members. In addition, AURA may conduct more extensive screenings, based on business necessity (e.g. liability, mitigation of risk); or as required by regulation/law, on newly hired staff and existing employees who fill, or are promoted to, specific positions identified by AURA..

Screenings are conducted based on the identification and personal information provided by the candidate. AURA relies upon the accuracy of information contained in the employment application as well as the accuracy of other data presented throughout the hiring process and employment, including any oral interviews. Pre-Employment screenings may include verification of information provided on the completed application for employment, the applicant's resume, or on other forms used in the hiring process. Any misrepresentations, falsifications, or material omissions in any of the information or data, no matter when discovered, may result in the exclusion of the individual from further consideration for employment or, if the person has been hired, termination of employment.

Offers of employment are conditional upon a pre-employment screening that is acceptable to the AURA, at AURA's sole discretion. Any applicant who refuses to sign a pre-employment screening release and/or fails to provide required references will not be eligible for employment.

#### 1. Basic Pre-Employment Screenings

Once preliminary hiring decisions have been made, the following screening(s), as required, will be conducted for individuals selected for hire:

- a) **Prior Employment Verification:** A verification of applicant's prior employment with his/her last two employers, or for the last seven years, whichever is greater. This may include dates of employment, position(s) held, and any additional information available pertaining to salary/wages, performance, reason for departure, and eligibility for rehire.
- b) **Professional References:** Individuals listed as references by an applicant who may attest to the knowledge, skills, and abilities of the individual with respect to the position for which the applicant has applied.
- c) **Professional License or Certification (if required):** Verification of status of licenses or certifications that may be required for the applicant to execute the position responsibilities.

## 2. Additional Pre-Employment Screenings

When filling certain positions specifically identified by AURA and/or its Centers, or as required by regulation or law, one or more of the following additional screenings may be conducted once a conditional offer of employment is made to new staff. To the extent established in the related respective procedures, such additional screenings will also be required for existing employees who move into these same positions who have not held a position requiring the screening in the past.

- a) Criminal: A check for criminal convictions in Federal, State and/or local/county (based on past residence) records for a period of up to seven years.
- b) Educational Verification – A confirmation of the applicant's claimed educational institution, including the years attended and the degree/diploma received.
- c) Motor Vehicle Record: provides a report on an individual's driving history in the state requested.
- d) Drug-Screening: Submission to third-party testing for use of prohibited drugs.

If determined to be required for its operation, any AURA Center, upon approval of the Center Director, may implement one or more of the additional pre-employment screenings, even if those screenings are not otherwise being implemented by AURA across the corporation.

Prior to it implementing any of the above additional pre-employment screenings, the AURA Corporate Office will present the related procedures to the AURA Board for evaluation and approval.

## 3. Skill Tests and Assessments

Employment screening assessments to determine an applicant's job fit may also be required of applicants for employment. Skills tests related to the demands of the job may be required. All assessments and skill tests will be evaluated to determine job-relatedness and will be administered in a consistent fashion to reduce or eliminate the possibility of discriminatory impact.

## 4. Procedural Implementation

AURA shall establish procedures for compliance with this policy as well as guidelines for evaluating the acceptability of information gathered during a pre-employment screening. Such procedures shall incorporate EEOC guidance, and shall be developed ensuring compliance with all applicable Federal and State laws/regulations including the Fair Credit Reporting Act (FCRA).

Any Center-specific procedures established must be approved by the AURA Corporate Office to ensure consistency as well as compliance with EEOC guidance and applicable law/regulations.

AURA reserves the right to modify this policy at any time with or without notice.