

Topic: PRE-EMPLOYMENT BACKGROUND INVESTIGATION POLICY		
Policy #: 201.00	Version: 1.1	Effective Date: 11/01/08

Purpose:

In order to verify the qualifications and backgrounds of individuals before being hired into positions at The University of Alabama, effective August 1, 2006, the Department of Human Resources will provide, at the department's request, pre-employment background investigations on final candidate(s) applying for positions at the university. This includes candidates from within the University as well as external candidates.

Policy:

At the request of the hiring department, a background investigation will be performed by an outside vendor with which the university has contracted. It is recommended that background investigations be conducted for, but not limited to, the following positions:

- Senior and executive level management positions
- Positions with access to university financial and/or sensitive information, records/databases
- Police and safety positions
- Positions handling cash and checks on a regular basis
- Positions having unsupervised contact with minors
- Positions with access to residence hall rooms
- Positions having patient contact or access to prescription medications

Background investigations will be conducted only at the request of the hiring department and must be completed prior to an offer of employment. Job postings for positions subject to background investigations will contain notification to applicants that, prior to hiring, the final candidate must successfully pass a pre-employment background investigation. The cost will be borne by the individual hiring departments.

This policy and the procedure for conducting pre-employment background investigations are available in the HR Policy Manual located on the Human Resources website.

Background Investigation Procedure

A background investigation should include criminal history, social security number trace, and, for some positions, a credit history. In addition, it is the responsibility of the hiring manager to check education and work references and, when required, MVR prior to a formal background investigation request being submitted.

1. Prior to advertising an open position, hiring manager (in consultation with Human Resources) will identify the position as one that will require a background investigation and will indicate which background investigation package is to be conducted.
2. Position advertisement (posting) will contain notification to applicants that, prior to hiring, the final candidate must successfully pass a pre-employment background investigation.
3. Position will be posted, applications will be forwarded to department, applicants will be selected for interview, applicants will be approved by HR for interview and interviews will be conducted.
4. Hiring manager will identify the final candidate(s) and indicate "Pending Background Check" in PeopleAdmin system.

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5. Human Resources will direct, via email, the selected candidate to vendor's website to submit online Disclosure and Consent Form and receive Fair Credit Reporting Act Summary of Rights and the background investigation will be initiated.
6. In the event the selected candidate does not have an email address, Human Resources will mail via US mail, or give in person, the Disclosure and Consent Form and the Fair Credit Reporting Act Summary of Rights to the selected candidate who will complete the paper form and mail/bring original documents to Human Resources.
7. When paper Disclosure and Consent Forms are received, Human Resources will input candidate's required information in vendor website. Data will be sent electronically to vendor to perform the background investigation.
8. Background verification will be completed by vendor and results viewed electronically by Human Resources.
9. If background investigation is satisfactory Human Resources will indicate "Background Check Approved" in PeopleAdmin.
10. Hiring manager will change applicant status to Finalist Recommendation and proceed with hiring process in PeopleAdmin.
11. If background investigation shows possible disqualifying information, Human Resources will discuss the information with the hiring manager. If the possibility of adverse action exists, Human Resources will provide a Pre-Adverse Action Notice along with a copy of the consumer report and a notice of rights to the candidate.
 - a. Candidate has a minimum of 5 business days to refute information with the vendor.
 - b. If candidate fails to respond in a timely manner to remove or clarify the disqualifying information the hiring manager may proceed with the hiring process and select another candidate.
12. If the decision is made not to hire the candidate, a Final Adverse Action Notice is mailed or emailed to the candidate by Human Resources explaining the reason for not hiring.
13. All information received in the background investigation process will be maintained in confidential, secure files, separate from employee personnel files, with access allowed only to those who have a need to know.

Address Discrepancy - Note: This section added in compliance with "red flag" rules effective November 1, 2008

Consistent with 16 CFR 681.1, if Human Resources receives a "Notice of Address Discrepancy" from the Background Check Vendor, the following measures will be taken:

1. Human Resources will undertake reasonable measures to ensure that the consumer report relates to the candidate. These measures will include comparing the information in the consumer report with (a) the online application completed by the candidate; (b) other information known to the University about the candidate, such as existing personnel records, or records of prior employment, (c) information received from reliable third party sources; (d) the paper Disclosure and Consent Forms completed by the candidate and mailed to Human Resources, if applicable; and (e) other information specifically requested and received from the candidate regarding such address discrepancy to verify the information in the consumer report.
2. Human Resources, via its vendor of consumer reports, will furnish the candidate's correct address to the consumer reporting agency, upon reasonable confirmation of accuracy, when Human Resources (a) can form a reasonable belief that the consumer report relates to the candidate; (b) the University establishes a continuing relationship with the candidate; and (c) the University regularly and in the ordinary course of business provides such information to the vendor or consumer reporting agency.