





Category: Operations		
	Policy Title: Background Check Policy and Procedure	Policy #: 5.1.3.1
	Subcategory: Human Resources	
	Preparer: Human Resources, Consultant  <small>Suana Watson (Jun 15, 2020 10:09 EDT)</small>	Approved Date: Jun 15, 2020
	Executive Owner: Corporate Operating Officer 	Revision Date:
Chief Executive Approval: President & CEO 		

1.0 Policy Statement

AUI recognizes the importance of maintaining a safe, secure workplace with employees who are qualified, reliable, and nonviolent, and who do not present a personal or financial risk. To promote these concerns and interests, AUI reserves the right to investigate an individual's prior employment history, personal references, and educational background, as well as other relevant information. Consistent with legal or contractual requirements, the Company also reserves the right to obtain and to review an applicant's or an employee's criminal conviction record, and related information, and to use such information when making employment decisions, but only to the extent permissible under applicable law.

A pending criminal matter may be considered in appropriate circumstances for business-related reasons, consistent with applicable law. All background checks will be conducted in strict conformity with the federal Fair Credit Reporting Act (FCRA), applicable state fair credit reporting laws, and state and federal antidiscrimination and privacy laws. The Company is an equal opportunity employer and will comply with applicable federal, state and local laws relating to the use of background checks for employment purposes.

2.0 Purpose and Scope

Due to a high percentage of federally funded government work and a heavy regulatory environment, Associated Universities Inc (AUI) will require full time and part time regular new hires and re-hires returning after 1 year of the effective date of separation, to completely and successfully meet background screening criteria as a condition of their employment or relationship with AUI as detailed below.

AUI Research Centers may conduct background checks applicable to select positions. The list of positions requiring background checks will be held and maintained by the Research Centers' HR department and include positions which work closely with minors and students, have access to financial information and/or handle cash, or require certain background checks as part of their job requirements. Notification of required background checks will be included in job postings and employment offer letters.



As outlined above, the following background checks will be conducted on new hires and re-hires of AUI Corporate and WoodStar Labs, as well as NRAO Senior personnel, as a condition of their employment or relationship with AUI:

- **Criminal History:** Includes review of criminal convictions and probation. To ensure the safety and security of the business, its employees or its customers and vendors. The following factors will be considered for applicants with a criminal history:
 - The nature of the crime and its relationship to the position.
 - The time since the conviction.
 - The number (if more than one) of convictions.
- **Social Security Verification:** Validates the applicant's Social Security number, date of birth and former addresses.
- **Professional References:** Calls will be placed to individuals listed as references by the applicant. Applicants must provide 3 references.

Temporary employees will generally be excluded from obtaining a background check. Any independent contractor, vendor or third party who will perform work on behalf of AUI on the workplace premises may be required to complete a baseline criminal and social security check, as described above when their involvement includes positions with access to sensitive information. The manager engaging in the consultant agreement or *Director of* should determine the necessity for a background check

Employees hired for positions with sensitivities to include but not limited to, software security, fiscal responsibility, education and public outreach, all levels of management, and procurement, will be required to successfully and completely meet additional background check criteria as described below. Individual position descriptions will describe additional background check requirements:

- **Prior Employment Verification:** Confirms applicant's employment with the listed companies, including dates of employment, position held and reason for departure and eligibility for rehire. This verification will be run on the past three employers or the previous seven years, whichever comes first.
- **Educational Verification:** Confirms the applicant's claimed educational institution, including the years attended and the degree/diploma received.
- **Motor Vehicle Records:** Provides a report on an individual's driving history in the state requested. AUI Research Centers may utilize this check when driving is an essential requirement of the position (for example, positions that require a CDL as a term of employment).
- **Credit History:** Confirms candidate's credit history. This search is state law permitting and will be run for positions that involve direct management of and involvement in Associated Universities Inc funds and/or handling of cash or credit cards, sets fiscal policies, or work with donors/donor information.



Although the type of background information checked for a particular person will vary based on the position offered/held and the nature of the business, all background checks will be obtained and used in compliance with all federal, state and local laws, including the Federal Fair Credit Reporting Act (FCRA) and other administrative agency guidance.

3.0 Regulatory References

- i. Fair Credit Reporting Act (FCRA) – The FCRA promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies.

4.0 Responsibilities

Human Resources

- The background check will be outsourced to remove bias. Human Resources will order the background check from the employment screening service. A designated HR representative will review all results.
- The HR representative will notify the hiring manager regarding the results of the check. In instances where negative or incomplete information is obtained, the HR representative will notify the Chief Operating Officer or designee who will assess the potential risks and liabilities related to the job's requirements and determine whether the individual should be hired. If a decision not to hire a candidate is made based on the results of a background check, there may be certain additional Fair Credit Reporting Act (FCRA) requirements that will be handled by Human Resources in conjunction with the employment screening service (if applicable).
- Stores and maintains background check information in a file separate from employees' personnel files for a minimum of five years.
- Develops the policy in accordance with this Background Check Policy and presents the status to the Policy Steering Group.
- Serves as the AUI subject-matter expert for the policy, including defining training and implementation actions.

Chief Operating Officer

- Reviews and approves the policy in accordance with company objectives and goals.

5.0 Revision History









Background Check Policy

Final Audit Report

2020-06-15

Created:	2020-06-13
By:	katryna carter (kcarter@aiui.edu)
Status:	Signed
Transaction ID:	CBJCHBCAABAA47WyQxMOs7a6AHDtD5ozj0WVn-gG0_hP

"Background Check Policy" History

-  Document created by katryna carter (kcarter@aiui.edu)
2020-06-13 - 5:05:19 AM GMT- IP address: 71.117.164.250
-  Document emailed to Suana Watson (swatson@aiui.edu) for signature
2020-06-13 - 5:10:00 AM GMT
-  Email viewed by Suana Watson (swatson@aiui.edu)
2020-06-15 - 1:13:39 PM GMT- IP address: 108.28.255.67
-  Document e-signed by Suana Watson (swatson@aiui.edu)
Signature Date: 2020-06-15 - 2:09:35 PM GMT - Time Source: server- IP address: 108.28.255.67
-  Document emailed to Adam Cohen (acohen@aiui.edu) for signature
2020-06-15 - 2:09:36 PM GMT
-  Email viewed by Adam Cohen (acohen@aiui.edu)
2020-06-15 - 2:10:57 PM GMT- IP address: 68.238.162.45
-  Document e-signed by Adam Cohen (acohen@aiui.edu)
Signature Date: 2020-06-15 - 2:15:58 PM GMT - Time Source: server- IP address: 68.238.162.45
-  Signed document emailed to Suana Watson (swatson@aiui.edu), katryna carter (kcarter@aiui.edu) and Adam Cohen (acohen@aiui.edu)
2020-06-15 - 2:15:58 PM GMT