THE GEORGE WASHINGTON UNIVERSITY

BACKGROUND SCREENING & PROFESSIONAL REFERENCE CHECKS Standard Operating Procedures for Individuals with Hiring Responsibility or Authority

PURPOSE AND SCOPE:

The purpose of this Standard Operating Procedure (SOP) is to provide The George Washington University's (GW) hiring managers with the step by step background screening process. This SOP outlines covered positions, components of the background screening, and the process of the screening, from the point of contingent job offer to the completion of background screening, and final hiring decision. This SOP also provides guidance on conducting professional reference checks, during the prehire stage. All job offers will be contingent upon the successful completion of the background screening and professional reference check.

DEPARTMENT RESPONSIBLE:

Hiring Department/School/Division

PERSONS RESPONSIBLE:

Hiring Managers
HR Client Partners (HRCP)
Staff Recruitment

BACKGROUND SCREENING COVERS:

- All external Finalists for covered positions, as defined in the policy. The specific components of each
 background screening depends on whether the covered position has been designated as Financially,
 Safety or Security sensitive and as High, Medium or Low risk in the Position Decision Matrix
 (PDM), utilized by HR.
- Internal Finalists (promotions, reclassifications or transfers) into covered positions when one or more of the following situations apply:
 - o If the finalist is currently in a position which is rated at medium or high risk, in any of the areas of Financially, Safety or Security sensitive AND the new position is rated medium to high risk, in any of the areas of Financially, Safety or Security sensitive, a background screening will apply. For example: If the current position is designated as Security sensitive, Medium risk level, and the new position is designated as Security sensitive, Medium risk level, a background screening will apply.
 - Background screenings are NOT required for internal promotions, reclassifications or transfers in the following situations: The new position is not designated as Financially, Safety or Security sensitive; The new position has decreased from a high or medium risk profile to a low risk profile (e.g. Security sensitive, High risk to Security sensitive, Low risk or Financially sensitive, Medium risk to Financially sensitive, Low risk; The new and old positions are both designated with a low risk profile. For example: If the current position is designated as Security sensitive, Low risk level, and the new position (even if it's in a different department or division) is

also designated as Security sensitive, Low risk level, a new background screening is not required.

- When the new position is designated as a Vice President (VP), Associate or Assistant Vice President (AVP) or "Chief" title (e.g., Chief Operations Officer, Chief Financial Officer)
- Current employees who have access to University vehicles, as a significant portion of their job responsibilities, will require regular Motor Vehicle Records (MVR) searches.

A third-party Background Screening Vendor, contracted by Office of the Chief Human Resources Officer (CHRO), will conduct the background screening.

External Finalists for Covered Positions

The minimum level of background screening (default screening) for external Finalists, for all covered positions, is the following:

- Criminal History Screening
- Education/Degree/Certifications Verification
- Social Security Number Trace
- Sex Offender Registry Search
- Prior Employment Verification

Additional screenings may include a Credit History Screening and an MVR search, as applicable to the covered position.

Internal Finalists for Covered Positions

The minimum level of background screening (default screening) for internal Finalists, will follow the screening criteria listed above for External Finalists and will be applicable to positions designated as financially, safety or security sensitive, and if other conditions are met as outline on page 1.

Additional screenings may include a Credit History Screening and an MVR search, as applicable to the covered position.

Finalist Selection

After the hiring proposal has been approved by Staff Recruitment, the HRCP will initiate a background screening on the Finalist for the covered position. Departments not "currently" covered by an HRCP, should default to Staff Recruitment and will work directly with Staff Recruitment, in steps that involve and reference an HRCP. In the case of internal staff, the hiring manager should immediately consult with their assigned HRCP to determine if the position change meets the criteria for a background screening. The purpose of the screening is to determine the Finalist's eligibility for the position. Staff Recruitment will be the recipient and holder of the background screening results. Staff Recruitment will make an assessment of "Pass," "Further Review Required," or "Fail" and inform the HRCP or the hiring manager, in departments not covered by HRCPs. Staff Recruitment may consult with other personnel, as appropriate, including the CHRO, Office of General Counsel, the HRCP, and the applicable VP/designee. In cases where further review is required or there is a finding of "Fail", pursuant to the Fair Credit Reporting Act, Staff Recruitment will ensure that the appropriate notices and related documents are sent to the Finalist. Finalists should not begin to work until the background screening is complete and verified as a "Pass".

Review of Background Screening Results

A criminal record, negative credit history, or other adverse results is not an automatic bar to employment at the University. The University will consider the passage of time and the severity, frequency, and nature of a conviction, as well as its relationship to the position in question. Other factors may include the candidate's full disclosure of the conviction during the application process (e.g., application, interview). Staff Recruitment may also consult with appropriate staff as part of that review (e.g., CHRO, HR Client Partner, Office of the Senior Vice President and General Counsel or applicable VP/designee) to determine whether the Finalist has passed the screening.

Promotions/Reclassifications - No Vacancy Posted

- 1. HRCP will request a revised job description from the hiring manager.
- 2. HRCP reviews job description to determine if duties fall within a PDM category, which may warrant a background screening.
- 3. If a screening is not applicable, no further action is required for a background screening.
- 4. If a screening is applicable, the hiring manager and Finalist will be notified that a background screening is required to determine eligibility for the new position.
- 5. User name and password are emailed to the Finalist, with instructions on how to initiate the background screening, via the online application. The instructions will include the statement reiterating that, all offers of employment are contingent on successful completion of the background screening. Failure to complete the background screening application and without notification to Staff Recruitment, will result in the offer being rescinded and the Finalist considered to have withdrawn from consideration.
- 6. Results will be reported to and maintained by Staff Recruitment.
 - a. Pass Staff Recruitment confirms with the HRCP or hiring manager that the employee is cleared for the new role.
 - b. Further Review Required Director of Staff Recruitment reviews results and makes the determination whether the employee is categorized as "Pass" or requires escalation for review by the CHRO and Sr. Vice President of General Counsel. If escalation is required, the HRCP or hiring manager will be notified that the status of the employee is pending and requires further review. Staff Recruitment or the HRCP will initiate the Pre-adverse Action notice, which will be sent by the background screening vendor, providing **five business** days to dispute or resolve with explanation. If the issue is not resolved or there is no response from the Finalist, Staff Recruitment will proceed to make a determination based on the results received and notify the vendor to follow-up with the Adverse Action notice if/when appropriate.
 - c. Fail Finalist is ineligible for the position. HR will work with the hiring manager to determine if the "fail" status has an impact to the finalist's current position.

External and Internal Competitive Hires - Vacancy Posted

- 1. Upon Staff Recruitment's approval of the Finalist identified by the hiring manager, via the Hiring Proposal, the contingent offer of employment is extended verbally by the hiring manager/designee, which maybe the HRCP or Staff Recruitment.
- 2. Once the Finalist has accepted the contingent offer, an official offer letter is prepared, using the GW approved offer letter template, which includes language that indicates all offers of employment are contingent upon successful completion of the pre-employment background screening, and that some University positions may require current employees to undergo periodic background screenings, as necessary for their position.
- 3. User name and password are emailed to the Finalist, with instructions on how to initiate the background screening, via the online application. The instructions will include the statement

reiterating that, all offers of employment are contingent on successful completion of the background screening. Failure to complete the background screening application and without notification to Staff Recruitment, will result in the offer being rescinded and the Finalist considered to have withdrawn from consideration.

- 4. Results will be reported to Staff Recruitment.
 - a. Pass Staff Recruitment confirms with the HRCP or hiring manager that the Finalist is cleared for the new role.
 - b. Further Review Required Director of Staff Recruitment reviews results and makes the determination whether the Finalist is categorized as "Pass" or requires escalation for review by the CHRO and Sr. Vice President of General Counsel. If escalation is required, the HRCP or hiring manager will be notified that the status of the Finalist is pending and requires further review. Staff Recruitment or the HRCP will initiate the Preadverse Action notice, which will be sent by the background screening vendor, providing five business days to dispute or resolve with explanation. If the issue is not resolved or there is no response from the Finalist, Staff Recruitment will proceed to make a determination based on the results received and notify the vendor to follow-up with the Adverse Action notice if/when appropriate. The hiring manager may choose to select the next qualified candidate from the applicant pool or cancel the position and repost.
 - c. Fail Finalist is ineligible for the position. For internal finalists, HR will work with the hiring manager to determine if the "fail" status has an impact to the finalist's current position.

Search Committee

When a search committee (formal or informal process for interviewing and vetting candidates) is used, the hiring manager, in consultation with Staff Recruitment, shall be responsible for ensuring that the Background Screening & Professional Reference Checks Policy and this SOP are followed. When a search firm is used, the hiring department is required to notify the firm that if a final offer of employment is made to a referred candidate, the Finalist shall comply with this policy.

Independent Contractors/Consultants & Temporary Staffing Agencies

In appropriate cases, contracts with an independent contractor or a temp agency will include a provision requiring the contractor or agency to conduct a background screening of the individuals who are assigned to work under the contract. The agency must have liability coverage that meets minimum University standards. In cases where the contract is with one individual or it is otherwise impracticable for the contractor to conduct the background screening, such individuals will be required to submit to a background screening conducted by the University.

Professional Reference Checks

The hiring department is responsible for conducting professional reference checks for Finalists in covered positions. Hiring departments should use the <u>University Telephone Reference Check Form</u> for that purpose. Hiring Managers shall provide the completed Forms to their HR Client Partner or to the office of Staff Recruitment, for final review, signoff, and inclusion with the hire paperwork, prior to the Finalist starting in the new position.

Hiring departments are also encouraged to check professional references for Finalists in Non-Covered Positions, including temporary hires obtained through Temporary Staffing Agencies, when possible.