HR Liaison Meeting
December 12, 2018

Presented by:
Human Resources

Colorado State University

MyHR
Working Together
Background Checks
Overview

- Myths
- Processes
- Observations
- Considerations
Myth Busters

- **Myth 1**
  - Rehired and student employees do not require background checks

- **Fact**
  - Currently all newly hired students and employees require a background check
  - Rehired employees and students may not require a new background check if the break in service is less than 12 months
Myth 2
- There is an employment grace period where candidates may begin work and new hire paperwork can be completed before the background check is completed

Fact
- Employment cannot begin until the hiring process, including the background check, is complete
- Completion of new hire paperwork (especially I-9) should not be done until authorization to hire is given from HR or OEO
Background Check Activities

- Total background checks requests received
  - TMS and email
- High volume period
  - April to October

<table>
<thead>
<tr>
<th>Background Check Activities</th>
<th>2018 April - October</th>
<th>2017 April - October</th>
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</thead>
<tbody>
<tr>
<td>Department Requests</td>
<td>5962</td>
<td>5744</td>
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<tr>
<td>Notification of Non-Response</td>
<td>872</td>
<td>1057</td>
</tr>
<tr>
<td>Re-sent Request to HireRight</td>
<td>642</td>
<td>627</td>
</tr>
<tr>
<td>Discrepancies</td>
<td>640</td>
<td>661</td>
</tr>
</tbody>
</table>
Processing Requests

- **Review Criteria**
  - Currently employed
  - Break in service greater than 12 months
  - Duplicate requests
    - Use of previous requests to approve new requests
    - Must have been completed within 12 months
  - Minors
    - Age 17 and under
    - Only Visual Compliance check
  - Foreign Nationals
    - No U.S. employment history
    - U.S. residency of 6 months or less
  - Associate/Affiliates

Sabbatical leave, military leave, maternity leave, and other types of university approved leave do not constitute a break in service.
• All requests are tracked in the Kuali Coeus Database
  • Name of requestor
  • Department
  • Each action taken on a Background Check Request is tracked and dated
    • Department request date
    • HR submittal to HireRight
    • Visual Compliance Check
    • Candidate approval
    • HireRight completion date
    • HireRight Delay Notifications
    • Requests to resend HireRight invitation
    • Notification to department of non-response
    • HR closed file date
Background Check Form

- Only request checks required for the assignment
- Do not request a MVR if current position does not require driving
  - Verify candidate has a valid driver’s license before submitting request
- Education checks at the request of and charged back to the department
- Candidate’s name should be the full legal name, not a nickname
  - Trevor Rhodes came back as Richard Rhodes III
- Middle names are needed for Visual Compliance checks

Department forms should be replaced with updated HR form
Candidate Data

- Start dates should be future dated
  - Same day start dates cannot be accommodated
  - Candidates cannot begin working until the background check is completed

- Candidate Email
  - Verify candidate’s email address before submitting request

- Candidate Cell Phone
  - HireRight sends notification via text to the candidate
Employee Type

- Select the appropriate employee type for the assignment
- Positions processed through TMS should not be submitted through the email Background Check Form process
Request Type

- Select the request type
  - New Hire – Candidate has never worked for any department within the University
  - Rehire – Candidate is coming back to work in the same or previous department
  - Transfer – Candidate has worked for another department and will be employed in a new department
  - Other – Comments to be added in Notes section to provide HR information on the candidate’s assignment
  - Candidate will have two campus assignments
  - Changing from NSH to Student assignment
• Required by HireRight to ensure all appropriate state waivers are completed by candidate
• Must be the actual work location
• Do not use Fort Collins as a default
• Zip Code of work location is required
- HireRight sends invite to candidate
  - Departments are responsible for ensuring candidates respond to HireRight invitations
- Department notified of non-response by candidate
  - Seven to ten days after initial invitation is sent by HireRight
- Department requests 2nd invitation be sent to candidate
  - Department must verify email address before RESEND request is submitted
- Non-response notification to 2nd invitation is sent to department indicating candidate is *Not Recommended For Hire*
• HireRight Invitation indicates this is from the Board of Governors

• User ID and Password required to access HireRight Invitation
Tracking Requests

- **Category Designations**
  - Requests are categorized based on the status of the background check
  - Requests move categories as the request is processed
    - When the HireRight invite is completed, the request moves to Not Complete
    - When the background check is complete, the requests moves to Attn: Completed BGC
    - Finalized and department notified approved for hire

- **Notifications**
  - Sent to departments
    - Non-response from candidate
    - Cancelled or Expired Invitations
Discrepancies

- Criminal or Motor Vehicle Reports (7 years)
  - Must discuss item on report with candidate
    - Department notified that candidate needs to contact HR
  - Discussion of incident with candidate
    - Specifics of the incident
    - When incident occurred
    - Court finding and adjudication

- Clarification of the job with department
  - Driving actually required
  - Access to residence halls
  - Access to minors, animals or controlled substances
  - Access to cash

- Assessment of risk to students and employees
Fair Credit Reporting Act (FCRA)

- Pre-Adverse Action Letter
  - HR notifies candidate background check results may prevent offer of employment
  - Minimum of five business days for candidate to respond
  - No hiring decision can be made during this period
  - Results discussed with Department to determine eligibility for hire
  - Hiring Authority may request exception to HR’s hiring decision from Dean or Vice President
- Adverse Action Letter
  - Notification employment will not be offered
Challenges for HR

- Submitted names not correctly spelled or do not include middle name
- Use of nicknames (Beth vs Elizabeth)
- Email address is incorrect or unverified with candidate
- Missing cell phone number
- Duplicate requests with slightly different names (Hobbon vs Hobson)
- Missing or incomplete Candidate Data (Student vs NSH)
- Non-response from candidate
# Duplicate Requests

- Request from same Department
- Names submitted differently for each request
- Initial request in July, second request in August
- Two requests tracked and notices sent to department
- Duplicate submittal discovered after HireRight invite completed
- Cannot easily track requests when candidate corrects name in HireRight

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<tr>
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<tbody>
<tr>
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<td>08/06/2018</td>
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<tr>
<td>2 HR Requested</td>
<td>08/13/2018</td>
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<tr>
<td>3 Restricted Party Screening</td>
<td>08/13/2018</td>
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<tr>
<td>4 Candidate Signed</td>
<td>08/28/2018</td>
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<tr>
<td>5 HireRight Done</td>
<td>08/30/2018</td>
</tr>
<tr>
<td>6 HR Closed</td>
<td>09/04/2018</td>
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<tr>
<td>4 Re-sent Per Request</td>
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<tr>
<td>5 HR Closed</td>
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Process Changes

- Developed categories to track the status of background check requests
- Developed Kuali Coeus Database
  - Eliminated multiple database tracking systems
- Cell phone contact
  - Added to Background Check Request Form
- Modified Background Check Form for Associate/Affiliate
  - Clarifying information added to Background Check Request Form
- Process requests based on expected start dates
- Student SSN Trace Discrepancy
Considering ...

- Undergraduate Student Background Checks
  - Removing background check requirement when
    - No access to vulnerable populations (i.e. minors or animals)
    - No access to controlled substances, select agents or other sensitive research materials/information
    - No unsupervised access to residence halls or other secure facilities
    - No access to Sensitive Information
      - Defined in the Background Check Policy
    - No driving required for the job
    - No access to cash
Resources

Background Check Webpage
http://www.hrs.colostate.edu/background-checks/background-checks.html

- Policy
- Background Check Form
- Roles and Responsibilities in Conducting Background Checks
- Background Check Workflow Chart
Happy Holidays!