Background Investigation Policy

Unit: Human Resources
Effective Date: 08/01/2006
Revision Date: 11/12/2018

Contact: Nancy Whittaker
Title: Associate Vice President for Human Resources

Purpose

In order to verify the qualifications and backgrounds of individuals before being hired into positions at The University of Alabama, the Department of Human Resources will provide, as set out in more detail below, background investigations on final candidate(s) applying for positions at the University. This includes external candidates, candidates from within the University who have not been subject to a background investigation within a year of applying for a new position, as well as University employees with a break in service of more than one year. This policy supersedes any previous background check policy.

Policy

A background investigation will be performed, by an outside vendor with which the University has contracted, on final candidates for all regular and temporary faculty and staff (not including undergraduate student workers). This includes adjunct faculty and graduate assistants. Background investigations may also be requested by the hiring department on final candidates for positions not included in the above, for volunteers, for positions in which the responsibilities are deemed to be sensitive in nature or when a background investigation is required by law. Some examples include:

- Positions with access to University financial and/or sensitive information, records/databases
- Police, security 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 or high security areas
- Positions having patient contact or access to prescription medications, other controlled substances, hazardous materials or select agents.
- Positions responsible for the care, safety and security of animals.

Background investigations 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 background investigation of a candidate who is a current employee may impact the current employee’s employment, particularly absent full self-disclosure in the application process by the current employee. The cost for background investigations will be borne by the individual hiring departments.
This policy also applies to candidates for employment in areas that may be required to use a different background investigation process and/or vendor.

Exceptions to this policy must be approved by the President.

**Self-Disclosure of Criminal Convictions**

Current University employees in positions covered by this policy are required to self-disclose to Human Resources post-employment criminal convictions, other than minor traffic violations, that occur after the effective date of the policy. Disclosure must be made within three business days of the conviction. Such disclosure shall be made on the Disclosure of Criminal Convictions form found on the Human Resources website and must be returned to Box 870126.

**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 Investigation Vendor, the following measures will be taken:

1. Human Recourses 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.

**Scope**

This policy applies to all faculty and staff.

**Office of the Vice President of Finance and Operations**

Signed: ______________________________ 11/12/2018  
Cheryl Mowdy  
Assistant Vice President for Finance and Operations