

# **Employment Background Checking**

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## Table of Contents

Committee Charter.....	3
Legal Requirements .....	4
Laws Pertinent to Background, Reference and/or Credit Checking .....	4
Facts .....	4
Current Background Checking Practices .....	5
Academic Human Resources and Staff Human Resources .....	5
Career Services Center and the Graduate School .....	6
Benchmarking .....	6
MAC Schools.....	6
Michigan Schools.....	7
Recommendations.....	7
Conclusion .....	8
Recommended Eastern Michigan University Background Policy.....	8
Purpose.....	8
Plan .....	8
Statement of General Policy .....	9
Definitions.....	9
Policy Provisions .....	10
Responsibilities .....	11
Records Retention.....	13
Sanctions for Violation .....	14
Appeals .....	14
Office Responsible for this Policy .....	14
Effective Date .....	14

## Appendix

A – Committee Members.....	15
B – Matrix .....	16
C – Job Classifications.....	17
D – Recommended Reference Checking Questions .....	18
E – Cost Matrix.....	19
F – Hires per Academic Year.....	22
G – HR Project Team Charter.....	23

## **COMMITTEE CHARTER**

The committee (Appendix A) is responsible for assessing and making recommendations to improve the criminal history (CHC), reference (RC), and credential checking (CC) processes in the offices of Staff Human Resources (SHR), Academic Human Resources (AHR), Career Services (CSC), and the Graduate School (GS).

This project began with the identification of current organizational problems and potential liability that exist with the current practices. Benchmarks with other universities were established, and best practices were examined. Recommendations of best practices, including potential vendors and related costs, changes in policy and processes, recommendations regarding what to do with adverse information, and an implementation plan are identified for this project.

The Committee operated under the following four premises:

1. EMU must develop a comprehensive employee screening process and policy.
2. In this area, the Law makes no distinction between regular employees and student employees.
3. Background checks need to be tailored to specific employee categories, the nature of the work performed and relevance of the items being screened to the position.
4. EMU must be consistent in our practice of performing the various checks that may be required in the hiring process.

Committee Process:

- Step 1 – Identify current organizational problems in AHR, SHR, CSC, GS
- Step 2 – Identify the level of liability that exists for the University with the current CHC, RC, and CC practices
- Step 3 – Identify what is done currently with adverse CHC, RC, and CC information
- Step 4 – Benchmark other universities
- Step 5 – Identify best practices for CHC, RC, and CC as it relates to each office
- Step 6 – Recommend new policies and/or procedures for CHC, RC, and CC and what to do with adverse information
- Step 7 – Recommend vendors and provide related costs
- Step 8 – Recommend implementation plan
- Step 9 – Evaluate, Revise and Re-deploy

## LEGAL REQUIREMENTS

According to the Bureau of National Affairs Human Resource Library, checking applicants' background before hire has a number of legal benefits, including complying with occupational licensing, preventing negligent hiring, and reducing the risk of wrongful discharge, discrimination, and other claims brought by employees who are terminated.

They also state that even when not legally required, reference and information checks can provide protection against negligent hiring claims, one of the fastest growing areas of liability for employers. Not every position carries the same risk of negligent hiring claims. However, employers should closely scrutinize applicants for positions that involve caring for vulnerable individuals or unsupervised access to valuable property, or other positions of safety or trust, such as:

- Medical staff and other health care workers
- Police officers, prison officials, security guards
- Motor vehicle and heavy equipment operators
- Hotel workers, maintenance engineers, apartment managers, and other workers with unsupervised access to property
- School, day care, and other workers who come in contact with children
- Bank tellers, financial managers, investment counselors, accounting personnel, and others with control over money and financial accounts.

### Laws Pertinent to Background, Reference, and/or Credit Checking

**The Bullard Plawecki Employee Right to Know Act** permits employees to review their personnel file as specified in the act. The act also imposes limitations on an employer's release to third parties of an employee's disciplinary reports and letters of reprimand.

**Fair Credit Reporting Act (FCRA)** permits employers to request a "consumer" credit report on an applicant for the purpose of "evaluating" that person for "employment, promotion, reassignment or retention as an employee." 15 USC 1681 a(h). If a decision is made to conduct a credit check, the employer must provide written notification that such a report may be used and then obtain the applicant's or employee's written authorization before requesting that the credit check be done. If, following a credit check, a decision is made to take adverse action, the employer must provide a copy of the report and a summary containing the nature and substance of the report to the applicant on which that adverse action is based.

**Family Educational Rights and Privacy Act (FERPA)** bars the release of student records without written consent and generally applies to all public and private educational institutions funded by any program administered by the U. S. Secretary of Education. Education records are those records that directly relate to a student and are maintained by an educational agency or institution or by a party acting for the agency or the institution. 20 USC 1232g(a)(4)(A).

## **CURRENT BACKGROUND CHECKING PRACTICES**

There are four offices that are designated as human resources centers on campus: Academic Human Resources (AHR), Staff Human Resources (SHR), Career Services Center (CSC), and the Graduate School (GS). These centers are responsible for overseeing the hiring processes for faculty, staff, student employees, and graduate assistant/doctoral fellows, respectively.

Each area functions independently in managing these processes. With this in mind, along with the University's emphasis on safety and security, it seemed timely to examine the current status of background checking for these employee groups.

The focus of this white paper is to report the current background checking practices of each center, show how this compares to other universities, and offer recommendations for ways to improve this process. In addition, current practices for reference checking and recommendations for enhancing that process are also included.

### Academic Human Resources and Staff Human Resources

#### History/Past Practices:

- All regular staff, faculty, lecturers, and temporary staff starting approximately nine years ago had ICHAT (Michigan State Police ICHAT system) and, at times, sex offender checks completed.
- All reports are stored in employee files.
- If convictions appeared on reports, the decision was left up to the hiring authority as to whether to hire the employee.

#### Current practice:

- All regular staff, faculty, lecturers, and temporary staff have background checks run on them through ICHAT and OTIS at the time of hire.
- All appropriate staff have drivers license, licenses/certifications verification, and reference checks completed prior to an offer of employment, as applicable.
- Higher management/executive VP levels have background checks performed through Pinkerton Consulting and Investigations when hired.
- All reports are stored in the employee's file.
- If convictions appear on the report, the decision is left up to the hiring authority as to whether to hire the employee.

### Career Services Center and the Graduate School

- All students must complete the criminal/felony question on the undergraduate (UG) and graduate (GR) admissions application. Those UG and GR students who answer the questions affirmatively are then reviewed by the University's Admissions Review Board.
- To date, background checks have not been routinely conducted on student employees or graduate assistant/doctoral fellows.

## **Benchmarking:**

In an effort to be consistent with our peer institutions, benchmarking was conducted to examine the processes in place at other universities in the MAC and in Michigan. The universities that responded are as follows:

### MAC Schools

- University of Akron - contact: 330.972.6583
  - They conduct a public records check with their onsite police department.
  
- Bowling Green State University - contact: 419.372.8421
  - They conduct background checks for police officers and high-level administrators. These background checks consist of only the state-wide criminal check similar to the one we currently do here at EMU. They are currently working on implementing a policy.
  
- University at Buffalo - contact: 716.645.7777
  - They are in the process of finalizing a background check policy. There has been no consistent practice on campus thus far.
  
- Kent State University - contact: 330.672.2100
  - They conduct background checks on the staff side but not on the academic side. Background checks are not conducted on current employees who are promoted. On the staff side, national background checks are done as well as national driving checks for those candidates who will be driving as part of their job description.
  
- Ball State University - contact: 765.285.1834
  - Criminal history checks, at a cost of \$7 each, are done on all employees. Hiring departments have to check references and dates of employment with other employers when applicants are being considered. It is not done centrally.

- Central Michigan University - contact: 989.774.3753
  - Their office conducts criminal history checks on all newly hired adjuncts and tenure track faculty through ICHAT and LexisNexis express screening. They conduct a verification screening and multicourt screening.
  - For employees being recruited from outside the state or who have a long history of residence outside of the state, they run criminal history check through [www.securint.com](http://www.securint.com) that verifies name, SSN, addresses, and so on.
- Western Michigan University - contact: 269.387.3620
  - Criminal history checks are conducted for new hires and transfers to a new position.

### Michigan Schools

- Grand Valley State University - contact: 616.331.2215
  - Criminal history checks are conducted on all new hires including regular, adjunct, visitors and temps. Some are done pre-hire and others are done post-hire. Background checks are typically not conducted for employees who are internally promoted unless they are part of a search, are selected, and have not had the appropriate check done before.
- University of Michigan - contact: 734.763.1284
  - Criminal history checks are conducted for new hires using HireRight.

## **RECOMMENDATIONS**

Based on the information gathered by this Committee, we are making the following recommendations:

- Create an administrative-level policy on background checking.
- The process that EMU currently uses should be expanded to include the post-offer stage after the conditional offer of employment is made. A third-party vendor will perform the post-offer verification. Such verifications may include: sex offender, violent history, criminal history, SSN trace, employment, credit and, health care sanction check.
- All offers of employment shall be contingent upon the following statements:
  - “This offer is contingent on the University’s verification of credentials and other information required by state law and EMU policies, including the completion of a criminal history check.”
  - Employment verification: This verification shall be completed before making an offer of employment to any individual.
  - Educational and License verifications: This verification shall be completed before making an offer of employment to any individual.

- Criminal history check (standard or limited) and sex offender registry and violent offender check (standard or limited): In all cases requiring such, these background checks shall be initiated after acceptance of the conditional offer of employment.
  - The individual's official name, date of birth, and social security number will be obtained from the person and provided to a third-party with whom the University has contracted for associated services.
- For all employment, education, and license checks/verifications required, departments shall maintain records indicating the item checked/verified, the name of the department personnel completing the check/verification, the date of the check/verification, and the status of the check/verification. These records shall be retained in the responsible human resource office.
- All results of criminal and sex and violent offenders' convictions or issues are considered confidential and will be maintained in confidential files within the responsible human resources office.
- The responsible human resources office will be responsible for any fees associated with any of the components of the background check process.
- Academic and Staff Human Resources will coordinate the receipt and payment of the third party vendor's fees.
- The Career Services Center and the Graduate School should begin student employee and graduate assistant/doctoral fellow background checking with a limited Michigan Criminal History Check using the Michigan State Police ICHAT/OTIS system.
- The Career Services Center and the Graduate School should phase in other aspects of the background checking process necessary and relevant to their employee populations over a three-year period.
- The background check documentation should be kept in a location other than the employee's personnel file and in accordance with current record retention practices.
- The background check process should be performed on all employees who have been promoted to new positions, including interim appointments, as appropriate.
- All hiring authorities should use the standardized list of reference check questions recommended in Appendix D. These questions will allow EMU to gather consistent information, are legally sound and are designed to elicit information that identifies potential problematic behaviors.

## **Conclusion:**

Overall, our review indicates that the University is doing an adequate job of background checking as it relates to faculty and staff employees. However, we must begin to implement this process with student and graduate assistant/doctoral fellow employees who can create the same risk of liability for us as do regular employees.

There is need for a University policy. It will establish an institutional mandate and formalize guidelines and procedures to ensure that this process is performed routinely and consistently, as required. A recommended policy is outlined below and will be submitted in appropriate EMO form for Presidential Approval, when appropriate.

## **Recommended Eastern Michigan University Administrative Policy on Background Checks**

This policy applies to all employees of Eastern Michigan University.

### **A. Purpose**

1. It is important that the University's academic and research missions are supported by qualified employees, with a safe and secure environment for all University constituents, including students, visitors, and employees. It is also important that Eastern Michigan University take meaningful action to protect its funds, property, and other assets.
2. This policy is intended to support the verification of credentials, criminal history, credit status, and other information related to employment decisions that assist the University in meeting its commitments.

### **B. Plan**

1. Eastern Michigan University will conduct a background check as part of the employment process for all new hires of faculty and staff. The final candidate for every University position, including academic, administrative, service, and support, is required to pass a background check prior to beginning the duties of the new position. This background check may include a criminal history check, a credit check, and verification of employment, education, or driving record, if applicable. Similarly, final candidates for student employee and graduate assistant/doctoral fellow positions are required to pass a limited background check.
2. Background checks are an administrative tool used to verify information and assess the appropriateness of an applicant's background history prior to extending an unconditional offer of employment. If completing a certain background check requires information from the candidate that is inappropriate to request earlier, a conditional offer of employment may be made based on the other checks but must be explicitly contingent on satisfactory results from the final checks.

### **C. Statement of General Policy**

1. It is the policy of Eastern Michigan University that all new hire employees have certain credentials including, criminal and other background information, verified as a condition of employment.
2. It is the policy of Eastern Michigan University that specified current employees with fiscal management responsibility have their criminal and other background information verified as a condition of continued employment.

### **D. Definitions**

1. “Credit history check” means checking the credit history of the selected applicant or employee. (Federal laws prohibit discrimination against an applicant or employee as a result of bankruptcy.)
2. “Criminal history check” means verifying that the selected applicant or employee does not have any undisclosed criminal history in any jurisdiction where the applicant or employee currently or previously resided.
3. “Driver’s License Verification” means ensuring that the selected applicant or employee possesses all the required licenses necessary for operating a motor vehicle in the performance of work activities.
4. “Educational verification” means ensuring that the selected applicant or employee possesses all educational credentials beyond high school listed on the application, resume, or cover letter or otherwise cited by the candidate that qualify the individual for the position sought.
5. “Employee” is defined as any person employed by Eastern Michigan University, as staff, faculty, or student/graduate assistant/doctoral fellow worker, whether full- or part-time (including regular or temporary status).
6. “Employment verification” means ensuring that the selected applicant or employee actually worked in the positions listed on the application, resume, or cover letter or otherwise cited by the candidate that qualify the individual for the position sought, as well as all employment during a period of at least seven (7) years immediately preceding application at Eastern Michigan University. This verification should include dates of employment and reasons for leaving each position.
7. “Healthcare Sanctions check” identifies sanctioned individuals and entities in the healthcare field. Sanctioned individuals are those who have been determined to be fraudulent in their field and /or those who have had adverse actions taken against them by the licensing boards of state governments. Reported actions may include reprimands, probations, suspensions and revocations of provider licenses, cease and desist orders, exclusions for failure to pay student loans, Drug Enforcement Agency (DEA) violations, child support violations, professional misconduct, and other similar sanctions and exclusions.
8. “License/Certification verification” means ensuring that the selected applicant or employee possess all the licenses and/or certifications listed on the application, resume or cover letter or otherwise cited by the candidate that qualify the individual for the position sought and verification of any license required for the position, including verification of the disposition of such licenses.

9. “Limited criminal history check” means verifying that student employees and graduate assistant/doctoral fellows do not have any undisclosed criminal history in the State of Michigan (using ICHAT/OTIS). The University reserves the right to conduct a full criminal history check if the student or graduate assistant/doctoral fellow will work in a sensitive position.
10. “Limited sex offender registry and violent offender check” means verifying that student employees and graduate assistant/doctoral fellows do not have undisclosed convictions of certain sex and violent crimes in the State of Michigan. The University reserves the right to conduct a full criminal history check if the student or graduate assistant/doctoral fellow will work in a sensitive position.
11. “Sensitive Position” means a position with responsibilities that can be criminally abused at great harm to the campus or members of the campus community.
12. “Sex offender registry and violent offender check” means verifying that the selected applicant or employee does not have undisclosed convictions of certain sex and violent crimes in every jurisdiction where the applicant or employee currently or previously resided.

## **E. Policy Provisions**

1. New Employees
  - a. All new faculty and staff employees shall have the following background checks completed as a condition of employment with Eastern Michigan University. For each of the background checks identified in this paragraph, the Academic Human Resources (AHR) or Staff Human Resources (SHR) office will perform the background check.
    - i. Employment verification
    - ii. Educational verification
    - iii. Driver’s license verification
    - iv. License/certification verification
    - v. Criminal history check - Sex offender registry and violent offender check- to be initiated by the hiring department or campus human resources office, with final completion by the campus human resources office
    - vi. Social Security Number Verification means a check of the social security number with the Social Security Administration (SSA) to confirm its authenticity
    - vii. Social Security trace means a check of the social security number in all of the jurisdictions in which the person has lived
  - b. All new faculty and staff employees who will be performing any of the following jobs shall also have the below listed additional background checks completed as a condition of employment with Eastern Michigan University:
    - i. Credit history check - Executive Level Employees such as Vice President, Associate or Assistant Vice President, Dean, Assistant or Associate Dean, University Athletics Director, Chief Information Officer, and other executive level positions authorized by Academic or Staff Human Resources (Job Groups 101, 102).
    - ii. Health Care Sanctions check - Health Professionals and Related Faculty (Job Groups 222, 224, 225 and 305).

- iii. Driver's License check - Public Safety & Risk Management (Job Groups 104, 105 and 701); other staff positions that operate motor vehicles in the performance of work (Job Groups 105, 301, 302, 306, 601, 702, 703 and 704) and any other faculty or staff positions identified by AHR or SHR.
  - c. All new student employees and graduate assistant/doctoral fellows shall have the following background checks completed as a condition of employment:
    - i. State of Michigan ICHAT/OTIS.
    - ii. Limited criminal history check.
    - iii. Drivers license check if applicable.
  - d. If the University has performed any of the above verification or history checks on an individual within the past year, a new verification or history check of that specific category will not be required. The results of the previously performed verification and/or history check will be considered in any pending employment decision.
- 2. Current Employees
  - a. All current employees who are promoted into any of the following jobs or functions, including interim appointments, shall have the following listed background checks completed as a condition of continued employment with Eastern Michigan University:
    - i. Credit history check - Executive Level Employees such as Vice President, Associate or Assistant Vice President, Dean, Assistant or Associate Dean, University Athletics Director, Chief Information Officer and other executive level positions authorized by Academic or Staff Human Resources (Job Groups 101 and 102).
    - ii. Health Care Sanctions check - Health Professionals and Related Faculty (Job Groups 222, 224, 225 and 305).
    - iii. Driver's License check - Public Safety & Risk Management (Job Groups 104, 105 and 701); other staff positions that operate motor vehicles in the performance of work (Job Groups 105, 301, 302, 306, 601, 702, 703 and 704) and any other faculty or staff positions identified by AHR or SHR.
  - b. If the University has performed any of the above verification or history checks on an individual within the past year, a new verification or history check of that specific category will not be required. The results of the previously performed verification and/or history check will be considered in any pending employment decision.

## **F. Responsibilities**

- 1. Academic Human Resources (AHR) Office and Staff Human Resources (SHR) will:
  - Consult with departments to determine whether positions require a criminal history check.
  - Consult with departments about policy interpretation, and actions to be taken when adverse information is found as a result of a background check.

- Coordinate the reference checking process (Appendix D – Recommended Reference Checking Questions).
2. The Career Services Center and the Graduate School will:
    - Coordinate limited criminal history checks for students and graduate assistant/doctoral fellows.
    - Coordinate the reference checking process (Appendix D – Recommended Reference Checking Questions).
  3. Background Check Review Committee
    - Reviews checks that reveal convictions and determines within seven days whether such information would disqualify individuals from sensitive positions.
    - Consists of one representative from the offices of Academic Human Resources, Staff Human Resources, Career Services Center, and the Graduate School.
      - a. If the criminal history check indicates that there are no convictions, the third party vendor will inform the initiator of the request who, in turn, will inform the applicant that the employment offer is confirmed.
      - b. If the criminal history check indicates that there is adverse information, the third party vendor will inform the responsible human resources office. The responsible human resources office will provide a copy of the report to the individual. (All related information will be treated as confidential and protected as such.)
      - c. If the criminal history check reveals convictions that the individual disclosed in the application, the responsible human resources office will review the report with the review committee. Jointly, they will evaluate each conviction, including any additional information that the individual provides, before the offer of employment is confirmed or withdrawn. The existence of a conviction does not automatically disqualify an individual from employment. Relevant considerations may include, but are not limited to, the nature and number of the convictions, their dates, and the relationship that a conviction has to the duties and responsibilities of the position. Any decision to accept or reject an individual with a conviction is solely at the discretion of Eastern Michigan University.
      - d. If unreported convictions are revealed in the criminal history check, the offer of employment will be withdrawn and, if employed, the individual will be separated from employment, unless the individual shows that the report is in error. The decision to reject or terminate an individual with an unreported conviction is solely at the discretion of Eastern Michigan University.
      - e. In the event that the results of the background check influence a decision to withdraw an employment offer or terminate employment, a representative from the review committee will inform the hiring department and the individual.

## **G. Records Retention**

1. Background checks may be completed prior to an offer of employment. An offer of employment may be made prior to completing all the background checks called for

above, but **only** if the offer explicitly specifies that it is contingent upon satisfactory results from the remaining background check or checks. It may be necessary to obtain the candidate's social security number and date of birth, for example, to complete some checks. It is not appropriate to obtain a candidate's date of birth until after an offer of employment is extended.

2. For candidates who are **not** hired:

- Records received on all criminal conviction checks and all other background searches, including the candidate's responses during the due diligence process, will be retained in a secure location with all other search information with the responsible Human Resources Office.
- All criminal and other background search records will be destroyed three years after the candidate was informed that he or she would not be hired.

3. For candidates who **are** hired:

- Records received on criminal conviction checks, including the candidate's responses during the due diligence process, will be retained by the responsible Human Resources Office during the entire course of employment and in accordance with post employment records retention policy for personnel record files.

## **H. Sanctions for Violation**

Violations of University policies, including providing false or misleading information used for any of the above background checks, will be handled in accordance with applicable University policies and procedures, which may include disciplinary actions up to and including termination from the University.

## **I. Appeals**

Decisions regarding the withdrawal of an employment offer as a result of a background check may be appealed to the next higher unit head for review. An employee who is terminated as a result of a background check may appeal such decision in accordance with normal problem-grievance resolution procedures.

## **Offices Responsible for this Policy**

Academic and Staff Human Resources, Career Services Center, and the Graduate School.

## **Effective Date**

The effective dates for full implementation of this policy are immediately after the approval of this policy for Employment, Education, and License verifications and March 1, 2009, for Criminal, Sex; and Violent Offender Registry; Credit History; and Healthcare Sanctions checks.

## APPENDIX A

### Committee Members

JillAnne Bauer ..... Administrative Manager, Graduate School  
Crystal Dunt ..... Human Resources Assistant, Staff Human Resources  
Pat Harris (Chair)..... Human Resources Consultant II, Staff Human Resources  
Mary Linblade..... Associate Director, Academic Human Resources  
Crystal Walrath ..... Assistant Director, Career Services Center  
Candice White..... Employment Specialist, Academic Human Resources

APPENDIX B

EMU MATRIX OF BACKGROUND CHECKS

	Types Of Checks											
	Pre	Pre	Pre	Post	Pre	Pre	Post	Post	Post	Post	Post	Post
	*MI Criminal History	*Driver's License	*License/Certificate	*Educational	*Soc Security Admin SSN	*Reference	*SSN	*Employment	*Sex & Violent Offender Registry	*Credit History	*Criminal History	*Healthcare Sanctions
Job Group	ICHAT/OTIS	Verification	Verification	Verification	Verification	Check	Trace	Verification	Check	Check	Check	Check
All New Employees	X		X	X	X	X	X	X	X		X	
Exec Level Administrators Job Group # 101, 102										X		
Health Professionals & Related Faculty Job Group # 222, 224, 225, 305												X
Public Safety & Risk Management Job Group # 104, 105, 701		X										X
Motor Vehicle Operation in Performance of Work Job Group # 105, 301, 302, 306, 601, 702, 703, 704		X										
Student Employees	X	X *										
Graduate Assistants	X	X *										

\* EMU currently checks SSN, DMV, ICHAT/OTIS (MI Criminal Offenses), Education (Transcripts) and Professional Licenses & Certifications and References as a part of the hiring process.

\* Background checks to be provided by external vendor

Pre= Before Offer

\* Will be performed as necessary for the job

Post=After conditional offer of employment

## APPENDIX C

### **Job Group Categories for the Purpose of Background Checking:**

#### **Executive Level Administrators**

- 101 Senior Executives Top-Level with college-wide responsibilities; includes President\*, Vice President's, Deans and miscellaneous executives
- 102 Senior Administrators – Academic Academic Department Heads, Assistant Deans, and Directors of Academic Areas

#### **Health Professionals & Related Faculty**

- 222 School of Health Professions
- 224 Nursing Education
- 225 Social Work Gerontology
- 305 Health Professionals Health Services Physician, nurse practitioners, nurses, pharmacists, Med Technologist (not health technicians)

#### **Public Safety & Risk Management**

- 104 Senior Administrators - Business & Finance Directors and, Associate Directors of financial business areas of EMU
- 105 Operations Leaders Forepersons, Assistant Directors, coordinators from across the college, except academic and student
- 701 Police & Security Campus Police Officers and Sergeants

#### **Motor Vehicle Operations in Performance of Work**

- 105 Operations Leaders Forepersons, Assistant Directors, coordinators from across the college, except academic and student
- 301 Academic Professionals Academic Advisors, coordinators, managers, program assistants, and education specialists for academic programs
- 302 Student Service Professionals Officers, assistants, associates, coordinators, advisors in student services such as financial aid, admissions, and housing
- 306 Athletic Professionals Coaches, assistant coaches, and equipment supervisors
- 601 Skilled Workers Plumbers, electricians, HVACs, carpenters, heating plant and roofers
- 702 Maintenance & Grounds Workers Facilities, grounds, athletics, maintenance crew workers
- 703 Custodial Workers Custodial: all levels
- 704 Food Service Workers Food service workers: all levels

#### **Student Employees**

- all student employees hired through the Career Services Center

#### **Graduate assistant/doctoral fellows**

- all graduate students hired through the Graduate School

*\*background checking process will be overseen by the Board of Regents.*

## APPENDIX D

### **Recommended Employment Reference Questions:**

Name of Person Interviewed: \_\_\_\_\_

Job Title: \_\_\_\_\_

Company/Organization Where Employed: \_\_\_\_\_

Interviewer: \_\_\_\_\_ Date of Interview: \_\_\_\_\_

Could you describe your relationship with the applicant and how long you worked together?

What position did the applicant hold with your organization?

What types of responsibilities did the applicant handle in that position, and which ones were most important?

What aspects of the job did the applicant handle particularly well?

In which areas of the job was the applicant weak or could have benefited from additional training or experience?

How would you say the applicant got along with peers? Subordinates? Supervisors? Customers or Clients?

Could you describe some occasions when the applicant had a high-pressure project or task and how he/she handled that?

Compared to other workers holding similar positions, how did the applicant perform?

Reason for leaving the organization?

Would you hire this person for the same position again?

Would your organization hire this person again in any capacity?

## APPENDIX E

Cost Matrix.

See Appendix F for number of hires per job class for cost analysis.

- Pricing information from four different vendors has been reviewed and compiled for a quick reference. **Each vendor is willing to work with Eastern Michigan University on different package pricing vs. ala carte.**
- Refer to Appendix F for number of employees different employees groups that would be subject to external checks.

	Kroll*	Pinkerton**	First Advantage	Validity
Social Security Verification	\$6.00	\$15.00	\$4.00	(1)
Credit Report	\$8.10	\$20.00	\$8.50	
Nationscan Criminal Search (includes sex offender)	\$15.00	\$30.00 per region	\$14.00	(1)
County Criminal (per county level court)	\$15.00	\$25.00	\$14.00	(1)
Statewide Criminal (per state repository)	\$10.80	\$25.00-45.00	\$9.00	(1)
Professional License Verification	\$11.00	\$20.00	\$9.00	
Honors and Awards Confirmation		\$20.00		
Prior Employer Verification (per employer)	\$12.00	\$20.00	\$8.00	
Reference Check (past or present supervisors, coworkers, etc)	\$18.00	\$20.00 per reference		
Education Confirmation (highest level)	\$12.00	\$15.00		
Medicaid Sanctions/Workers Comp		\$15.00	\$8.00	
Motor Vehicle	\$4.50	\$20.00		
<i>COMPLETE PACKAGE COST</i>	<i>\$112.40</i>	<i>\$245.00</i>	<i>\$74.50</i>	<i>\$35.00</i>

\* One time \$100 set up fee.

\*\* No monthly fee, minimum volume or setup fees.

(1) Package Price \$35.00

Description of Services to be Performed:  
(adapted from Kroll )

**Consumer Credit Report (Employment Purposes)** This service provides an individual's credit history and may also provide information such as places of employment or prior addresses, credit account types, terms, amounts past due, loan types, balances, public records, high credit, dates accounts were opened and closed, payment patterns, credit limits, and modes of payment. The source of this report is a credit bureau.

**County Civil Record Search** This search provides information regarding civil suits filed by or against the subject in the county of the state where the suit was filed. Civil records are filed by name and may not contain a secondary identifier.

**County Criminal Record Search** This search may provide felony and/or misdemeanor convictions and/or charges located at the county level. Each jurisdiction is different and some report felony and/or misdemeanor convictions and/or charges out of different courts. Additionally, state laws may restrict the reporting of arrest records, non-convictions, and the time period for which records may be reported.

**Credential Verification** This search contacts an organization or agency to verify a qualification or affiliation, member status, and other available information.

**Driving Record** The driving record (motor vehicle record) will verify the driver's license number, status, and state of issuance and may provide information such as full name and physical description, as well as recent moving traffic violations and accidents. *Note that several states require a state-specific release form.*

**Education Verification** This search contacts institutions where degrees were attempted or received and may report dates of attendance, major or course of study, degrees received, and dates of graduation.

**Employment Verification** This search will verify through the employer's Human Resources Department dates of employment, position, duties, eligibility for rehire, salary, attendance, and performance. Note employer's policy will determine types of information released.

**Federal Criminal Records Search** This search is conducted through a Federal District Court and may include federal offenses such as bank robbery, embezzlement, tax evasion, mail fraud, crimes occurring across state lines, or crimes occurring on federal property.

**Federal Criminal National Record Search** This search is conducted by searching a subject's name in all available online Federal District Courts and may include charges such as bank robbery, embezzlement, tax evasion, mail fraud, crimes occurring across state lines, or crimes occurring on federal property. For common names, results will be returned in those jurisdictions associated with the subject's Social Security Number Trace or Social Security Number Trace and Address Locator. *Not all Federal Districts are available online.*

**Federal Civil Records Search** This search is conducted through a Federal District Court and provides information regarding civil suits filed by or against the subject. Civil records are filed by name and may not contain a secondary identifier. Federal civil suits may involve disputes with considerations greater than \$75,000, suits filed between parties residing in different states, or a subject in violation of Federal law.

**Professional License Verification** This search contacts the applicable State or National licensing board or agency to verify information such as license type, license number, status, original issue date and disciplinary action.

**Professional Reference Verification** The agency will interview an applicant's personal references, asking industry-standard questions. Three separate attempts will be made to contact each reference.

**Social Security Number Trace & Address Locator Database** This search may provide the following information:

- Name and name variations used by the individual, such as maiden, divorced, or previous names
- Current and former address(es) associated with that SSN
- Date of birth (may be limited to month and/or year of birth)

**Statewide Criminal Record Search** This search may include felony and/or misdemeanor charges or convictions where available in a State database, usually from State law enforcement or the Administrative Office of the Courts. Note that not all States offer an official statewide service, and some states do not have complete records due to reporting delays or exemptions. The agency will report information contained in the Statewide database that is not barred by the Fair Credit Reporting Act (FCRA) or state-specific reporting laws.

**U.S. Criminal Records Indicator Search** Database search of records including information from State Sex Offenders Registries plus the District of Columbia, 39 states from DOC sources, 13 states from AOC sources, plus multiple online county records, Office of Foreign Assets and Control (OFAC), Designated and Blocked Individuals List, and Interpol Most Wanted list. Because this is a database, no guarantee can be made that all felony and misdemeanor convictions are reported from each agency. Records typically do not contain summons, citations, pending charges, active charges, open warrants, or disputes between private parties. Some states have additional statewide criminal law enforcement repositories that are not included in this database search. The results of this database search should not be used for employment, credit, insurance, or any other purpose under the FCRA without independent verification of the results. Client must verify the record separately through a County and/or Statewide criminal search in a supplemental report.

## APPENDIX F

### New Hires Per Academic Year (summer – spring)\*

- Limited checks (OTIS and ICHAT) would be done on student employees and graduate assistance only.
- Out of state and international students would not be subject to these checks.

	Michigan	Other	International	Total Employees
2006 (7/1/06 – 6/30/07)				
Student Employees	1196	157	103	1456
Graduate assistant/doctoral fellows	149	15	44	208
<b>Total Employees by Region</b>	<b>1345</b>	<b>172</b>	<b>147</b>	<b>1664</b>
2007 (7/1/07 – 6/19/08)				
Student Employees	1148	138	114	1400
Graduate assistant/doctoral fellows	126	18	44	188
<b>Total Employees by Region</b>	<b>1274</b>	<b>156</b>	<b>158</b>	<b>1588</b>

### Staff/Academic Appointments

	EC, ES, TM (Temps)	AC, CC, CP, CS, FM, PS, PT	AP**	FA, LE, LL	Total Employees
7/1/06 – 6/30/07	150	98	14	268	530
7/1/07 – 6/3/08	187	95	19	188	489

\*Data pulled from Banner generated report – Staff Human Resources 6/19/08.

\*\*This number includes both staff and academic AP's.

APPENDIX G

**HR Project Team Charter**

**Project: Assessment – Background, Reference and Credential Checking Process**

**Date: 02/22/2008**

<p>1. Description – Describe the Team’s purpose.</p>	<p>The team is responsible for assessing and making recommendations to improve the criminal history (CHC), reference (RC), and credential checking (CC) processes in the offices of Human Resources (HR), Academic Human Resources (AHR), Career Services (CS), and the Graduate School (GS).</p>
<p>2. Project Scope – Describe the Beginning and End to this process</p>	<p>This project begins with the identification of current organizational problems and liabilities that exist with the current practices. Benchmarks to other universities and the private sector will be established, and best practices will also be examined. The project ends with the development of a white paper that will include recommendations of best practices including potential vendors and related costs, changes in policy and processes, recommendations regarding what to do with adverse information, and an implementation plan.</p>
<p>3. The project link to the Strategic plan or Objectives – Why is this important?</p>	<p>This project is linked to Strategic Direction # 6 – Improving Institutional Effectiveness.</p>
<p>4. Deliverables – Describe the deliverables of the team.</p>	<ul style="list-style-type: none"> <li>• Step 1 – Identify current organizational problems in AHR, SHR, CS, GS</li> <li>• Step 2 – Identify the level of liability that exists for the University with the current CHC, RC, and CC practices</li> <li>• Step 3 – Identify what is done currently with adverse CHC, RC, and CC information</li> <li>• Step 4 – Benchmark other universities and private sector companies</li> <li>• Step 5 – Identify best practices for CHC, RC, and CC as it relates to each office</li> <li>• Step 6 – Recommend new policies and/or procedures for CHC, RC, and CC and what to do with adverse information</li> <li>• Step 7 – Recommend vendors and provide related costs</li> <li>• Step 8 – Recommend implementation plan</li> <li>• Step 9 – Evaluate, Revise, and Re-deploy</li> </ul>
<p>5. Team Sponsor - Supports the project efforts to ensure success</p>	<p>Craig Reidsma      <a href="mailto:creidsma@emich.edu">creidsma@emich.edu</a>      7.2275</p>
<p>6. Team Leader – Responsible for planning and managing the action plan.</p>	<p>Pat Harris:      <a href="mailto:pharris@emich.edu">pharris@emich.edu</a>      7.3430</p>

<p>7. Team Members - Come together for a specific project</p>	<p><b>Members:</b>  JillAnne Bauer            <a href="mailto:jillanne.bauer@emich.edu">jillanne.bauer@emich.edu</a>            7.0379  Crystal Dunt                <a href="mailto:cdunt@emich.edu">cdunt@emich.edu</a>                7.2204  Mary Linblade              <a href="mailto:mary.linblade@emich.edu">mary.linblade@emich.edu</a>              7.0076  Crystal Walrath             <a href="mailto:cwalrath@emich.edu">cwalrath@emich.edu</a>             7.1304  Candice White              <a href="mailto:cwhite4@emich.edu">cwhite4@emich.edu</a>              7.0076</p>
<p>8. Requirements – What will Team need to do to accomplish its objectives?</p>	<ul style="list-style-type: none"> <li>• Understand the various approaches to criminal history, reference, and credentials checking.</li> <li>• Investigate and benchmark indicators and metrics for institutional outcomes that represent best practices at other universities and in the private sector.</li> <li>• Recommend desired practices, procedures, policies, and vendors (if applicable).</li> <li>• Complete tasks and assignments in between team meetings.</li> </ul>
<p>9. Team Ground Rules – How will the team operate to accomplish its tasks?</p>	<ul style="list-style-type: none"> <li>• Contact the Team Leader prior to the meeting if attendance is not possible.</li> <li>• Be prompt. All meetings will begin and end on time.</li> <li>• Complete assigned tasks prior to following meeting.</li> <li>• Keep confidential information confidential.</li> <li>• Practice consensus team decisions.</li> <li>• Respect other team members’ ideas and views.</li> <li>• Disagree as an ally when differences are perceived with other team members.</li> <li>• Send out agenda at least two business days before each meeting.</li> <li>• Send detailed minutes within 48 hours after each meeting.</li> <li>• Build on ideas of others.</li> <li>• Stay focused on the topic.</li> <li>• Do not interrupt others.</li> <li>• Engage in one conversation at a time.</li> </ul>
<p>10 Time Line</p>	<p>Start Date: February 22, 2008  Target project completion date: April 2008  Actual End Date: July 2008</p>
<p>11 Champions – Authority to remove barriers or provide resources</p>	<p>Karen Simpkins, Interim AVP, Human Resources  Rhonda Kinney-Longworth, Interim AVP, Academic Human Resources  Sarah Kersey Otto, Interim Director, Career Services  Deb deLaski-Smith, Interim Dean, Graduate School</p>