



**THE GEORGE
WASHINGTON
UNIVERSITY**
WASHINGTON, DC

Responsible University Official: Vice President for Human Resources and Vice Provost for Faculty Affairs
Responsible Office: University Human Resources
Last Revised Date: March 31, 2017

BACKGROUND SCREENING

Policy Statement

It is the policy of the university to conduct a Standard Background Screening for all Finalists for Faculty and Staff positions and for current GW Faculty and Staff who are Finalists for transfer or promotion to certain positions, and to conduct additional background screenings in certain instances, consistent with business necessity.

Reason for Policy

Background screenings and verification of relevant information help protect the safety and security of the university’s students, Faculty, Staff, and guests, as well as university assets, by reducing the likelihood of crime, injury or loss, and increasing confidence in the university’s workforce. This policy is intended to inform the university community, applicants for university positions, and Hiring Managers of the requirements for background screening.

Who is Governed by this Policy

Faculty and staff

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Policy

Background Screenings for Faculty and Staff

- A. Except as otherwise provided in this policy, offers of employment for Faculty and Staff positions are contingent upon the successful completion of a Standard Background Screening.
- B. Standard Background Screenings for Staff who are student employees are only required in positions that are Financially, Safety, or Security Sensitive.
- C. GW Faculty and Staff who are Finalists for a transfer or promotion and who have not had a Standard Background Screening conducted by GW within the preceding five (5) years are subject to a Standard Background Screening as well as any additional background screenings depending on the requirements of the position as determined by the VPHR or designee, if such other screenings have not been conducted within the preceding five (5) years.
- D. Offers of employment for Finalists for Faculty and Staff positions, Faculty and Staff who are Finalists for transfer or promotion, and Faculty and Staff during the course of employment, may be subject to additional background screenings as determined by the VPHR or designee. These additional background screenings may include, but are not limited to, a Standard Background Screening, a Motor Vehicle Records Search, Credit History Screening, verification of licenses and certifications, medical examinations by a licensed medical professional, and Drug Screening, as appropriate to the position and consistent with business necessity.
- E. Hiring Managers are responsible for incorporating this policy into their hiring processes for all applicable Faculty and Staff positions. Hiring Managers should contact their HR Representative or the Human Resources Office of Talent Acquisition & Recruitment for additional information on implementation of this policy.
- F. University job postings and advertisements should include a statement that successful completion of a background screening will be required as a condition of hire.
- G. Background screenings under this policy are normally conducted by third party vendors. Exceptions must be approved by the VPHR or designee. The

university complies with all applicable federal, state and local statutes and regulations relating to background screenings, including, but not limited to, the Fair Credit Reporting Act.

- H. Background screenings identified in this policy are not intended to be used instead of reference checks. Hiring Managers, the applicable Human Resources Representative, or a search committee remains responsible for conducting professional reference checks for Finalists.
- I. No individual who is subject to a background screening under this policy will be permitted to begin working at GW until the background screening results have been received and the hiring department has received notice that the individual has satisfactorily passed the applicable background screening. The VPHR or Provost or designee may grant exceptions for a Staff or Faculty hire, respectively, but continued employment will be contingent upon satisfactory completion of the background screening.
- J. Background screenings will be conducted for Finalists for Faculty positions who have not been appointed to a Faculty position at GW within the preceding thirteen (13) months.
- K. This policy does not replace any applicable law, regulation, contractual obligation, collective bargaining agreement, or other university-approved policy that otherwise addresses background screenings.

Review of Background Screening Results¹

- A. The initial review of Faculty and Staff background screening results will be conducted by HR. In the event of potential adverse results which may preclude employment at GW, HR will review the results as follows: 1) for Staff, may consult with the Executive Vice President and Treasurer or designee; and 2) for Faculty, will consult with the Provost or designee. The Office of the Senior Vice President and General Counsel, the Office of Safety and Security, and other university offices, as appropriate, may be consulted to assist in the review. The information received from background screenings will be used only to determine the Finalist's qualifications and suitability for employment or engagement and whether there is a legitimate business reason for withdrawing a conditional offer of employment, as determined by the university, and will not be used to discriminate on any basis protected by applicable law or university policy.
- B. Adverse results, including a criminal record from background screenings are not an automatic bar to employment at the university. Assessments will be

¹ This section does not apply to review of medical examinations by a licensed medical professional or drug testing results. Reviews of these results are conducted in accordance with separate applicable guidance.

made on an individual basis, taking into account factors including, but not limited to, the passage of time and the severity, frequency, and nature of an adverse result, as well as its relationship to the position in question, information produced by the Finalist establishing rehabilitation or good character, and the implication for the general safety and security of the university community as well as the security of university assets.

- C. Should the background screening result in a current employee not being hired into the new position, s/he may lose employment, remain in his/her original position, or the original position may be altered, at the discretion of the university.
- D. Screening results will be stored separately from the employee's personnel file and confidentially maintained in accordance with applicable law and university policy.

Background Screenings for Independent Contractors/Consultants & Employees of Temporary Staffing Agencies

In appropriate cases, as determined by the VPHR or designee, a contract with an Independent Contractor/Consultant or a temporary staffing agency must include a provision requiring the Independent Contractor/Consultant or agency to conduct background screenings of the individuals who are assigned to do work for the university under the contract. When it is otherwise impracticable for the Independent Contractor/Consultant or agency to conduct the background screening, such individuals who are assigned to do work for the university may be required to submit to a background screening conducted by the university.

Definitions

Credit History Screening: Provides a report of an individual's credit and payment history. Credit History Screenings are conducted by a third party vendor. Credit History Screenings may only be conducted when permissible under applicable law, and only with the approval of the VPHR.

Criminal History Screening: Provides a report of an individual's national criminal history and appearance on a sex offender registry. Criminal History Screenings are conducted by a third party vendor.

Drug Screening: Provides a report of the presence of certain drugs. Drug Screening of an individual, and random and reasonable suspicion drug testing of employees may be conducted for those holding certain Safety Sensitive positions involving the driving of motor vehicles. Drug Screenings are conducted by a third party vendor and are administered and conducted in accordance with applicable university policies.

Education Verification: Verifies the highest earned degree, professional licenses, and certifications as listed by the Finalist on the university job application and/or resume. For Finalists for Faculty positions, all post-secondary degrees will be verified.

Faculty: All faculty under Article I of the Faculty Code and who are employed by the university.

Finalist: The external or internal candidate selected for the position, subject to successful completion of a background screening, as described in this policy.

Financially Sensitive: Positions involving the handling of cash, checks or credit card account information, or those with access to independently change financial records. This position may also have the authority to commit financial resources on behalf of the university.

Hiring Manager: An employee with hiring authority within their respective school/division/department.

Independent Contractor/Consultant: Individuals, sole proprietorships, partnerships, corporations, or organizations that provide services to the university, as determined under the university's Worker Classification and Payment Policy.

Motor Vehicle Records Search (MVR): Validates the state-issued driver's license of the Finalist and provides information related to the Finalist's driving record. A MVR search is conducted for Finalists for positions that use or perform maintenance on university vehicles as a significant portion of the job responsibilities.

Safety Sensitive: Positions having regular access to or providing maintenance to university vehicles, fixed assets, or dangerous equipment, e.g., heating/cooling systems; possession of building master or sub-master keys or access to residential buildings and certain other facilities, e.g., GWPD Officers, Residence Hall Staff; having responsibility for providing care and/or oversight to minors, non-degree-students or child care; and/or having access to pharmaceuticals, select agents, or controlled substances.

Security Sensitive: Positions having access to secured or sensitive areas, e.g., data center, legal files, server rooms; or to information, e.g., personally identifiable information about students, Faculty, Staff or alumni such as Social Security numbers or credit card numbers.

Social Security Number Trace: Verifies the Finalist's Social Security number.

Staff: Regular and Temporary Staff employees, including but not limited to research positions, librarians, post-doctoral fellows, and student employees.

Standard Background Screening: A Criminal History Screening, Education Verification, and Social Security Number Trace.

Temporary Staff: Non-Faculty employees in temporary, transitory positions. Cumulative employment in one or more temporary staff positions generally does not exceed 700 hours in a fiscal year.

Forms

[University Telephone Reference Check Form \(for use for Staff Positions\)](#)

Related Information

[GW Jobs Homepage](#)

[University Telephone Reference Check Form](#)

[Fair Credit Reporting Act Notice](#)

Faculty Code

Contacts

Contact	Telephone	Email
Human Resources	202-994-9600	gwujobs@gwu.edu

Document History

- **Last Reviewed Date:** July 6, 2018
- **Last Revised Date:** March 31, 2017
- **Policy Origination Date:** October 12, 2010

Who Approved This Policy

Louis H. Katz, Executive Vice President and Treasurer

Beth Nolan, Senior Vice President and General Counsel

Forrest Maltzman, Provost and Executive Vice President for Academic Affairs

This policy, as well as all [university policies](#), are located on the [Office of Compliance's](#) home page.