BACKGROUND SCREENING POLICY

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/Purpose

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 Needs to Know This Policy

Faculty and Staff

Table of Contents

<table>
<thead>
<tr>
<th>Table of Contents</th>
<th>Page #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Statement</td>
<td>1</td>
</tr>
<tr>
<td>Reason for Policy/Purpose</td>
<td>1</td>
</tr>
<tr>
<td>Who Needs to Know This Policy</td>
<td>1</td>
</tr>
<tr>
<td>Table of Contents</td>
<td>1</td>
</tr>
<tr>
<td>Policy</td>
<td>2</td>
</tr>
<tr>
<td>Definitions</td>
<td>4</td>
</tr>
<tr>
<td>Forms</td>
<td>5</td>
</tr>
<tr>
<td>Website Address for This Policy</td>
<td>5</td>
</tr>
<tr>
<td>Contacts</td>
<td>6</td>
</tr>
</tbody>
</table>
Policy

Background Screenings for Faculty and Staff

1. Offers of employment for Faculty and Staff positions are contingent upon the successful completion of a Standard Background Screening.

2. Offers of employment to Finalists for Faculty and Staff positions designated as Financially, Safety, or Security Sensitive are contingent upon the successful completion of a Credit History Screening in addition to a Standard Background Screening.

3. GW Faculty who are Finalists for positions designated as Financially, Safety, or Security Sensitive are subject to a Standard Background Screening and a Credit History Screening.

4. GW Staff who are Finalists for a transfer or promotion are subject to a Standard Background Screening and other screenings as appropriate to the position, as determined by the Vice President for Human Resources or designee (VPHR), and consistent with business necessity.

5. Additional background screenings may be conducted at the time of hire, or during the course of employment, with the approval of the VPHR. These additional background screenings may include, but are not limited to, a Motor Vehicle Records Search, verification of licenses and certifications, and medical examinations, as appropriate to the position and consistent with business necessity.

6. University job postings and advertisements should include a statement that successful completion of a background screening will be required as a condition of hire.

7. Background screenings under this policy are normally conducted by third party vendors. Exceptions must be approved by the VPHR. 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.

---

1 Hiring Managers and deans’ offices are responsible for incorporating this policy into their hiring processes for all applicable Faculty and Staff positions. Please contact your HR Client Partner or the Human Resources Office of Talent Acquisition & Recruitment for additional information on implementation of this policy.
BACKGROUND SCREENING POLICY

8. Background screenings identified in this policy are not intended to be used instead of reference checks. Hiring Managers, the applicable Human Resources Client Partner, or a search committee remain responsible for conducting professional reference checks for Finalists.

9. 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.

10. Background screenings will be conducted for Finalists for faculty positions who have not been appointed to a faculty position at GW within the preceding twelve (12) months.

11. 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 Results

1. Review of Staff background screening results will be conducted by HR, and review of Faculty and academic administrator background screening results will be conducted by the VPHR in consultation with the Provost. The VPHR and Provost may consult with the Office of the Senior Vice President and General Counsel, the Office of Safety and Security, and other university offices, as appropriate, 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.

2. A criminal record, negative credit history, or other adverse results are not an automatic bar to employment at the university. Assessments will be 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.
BACKGROUND SCREENING POLICY

3. Should the background screening result in a current employee not being hired into the 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.

4. 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, a contract with an Independent Contractor or a temporary staffing agency must include a provision requiring the contractor or agency to conduct background screenings of the individuals who are assigned to work under the contract. When an individual is an Independent Contractor or it is otherwise impracticable for the contractor to conduct the background screening, such individuals may be required to submit to a background screening conducted by the university.

Definitions

Credit History Screening: Provides a report of the Finalist’s credit and payment history. Credit History Screenings are conducted by a third party vendor.

Criminal History Screening: A national criminal history screening and a sex offender registry search will be conducted for all Finalists.

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.

Employment Verification: Verifies current and prior employment as listed by the Finalist on the university job application and/or resume.

Faculty: Active status faculty as defined by section I.B 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 input or change financial records. This position may also have the authority to commit financial resources on behalf of the university.
BACKGROUND SCREENING POLICY

**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 wage account non-Faculty employees, including but not limited to research positions, librarians, post-doctoral fellows, and student employees.

**Standard Background Screening:** A background screening normally comprised of a criminal history screening, education verification, employment verification, Social Security Number Trace.

**Wage Account Employees:** Non-Faculty employees in temporary, transitory positions without university benefits. Cumulative employment in one or more wage account positions may not exceed 700 hours in a fiscal year.

---

**Forms**

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

---

**Website Address for This Policy**

[GW University Policies]
BACKGROUND SCREENING POLICY

Contacts

<table>
<thead>
<tr>
<th>Subject</th>
<th>Contact</th>
<th>Telephone</th>
<th>Email Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Questions</td>
<td>Human Resources</td>
<td>202-994-9600</td>
<td><a href="mailto:gwujobs@gwu.edu">gwujobs@gwu.edu</a></td>
</tr>
</tbody>
</table>

Related Information

GW Jobs Homepage
University Telephone Reference Check Form
Fair Credit Reporting Act Notice
Standard Operating Procedures for Hiring Managers

Who Approved This Policy

Louis H. Katz, Executive Vice President and Treasurer
Beth Nolan, Senior Vice President and General Counsel
Steven R. Lerman, Provost and Executive Vice President for Academic Affairs

History/Revision Dates

Origination Date: October 12, 2010
Last Amended Date: May 8, 2015
Next Review Date: April 30, 2016