



Background Check Policy and Procedure

Purpose

Alma College desires to provide a safe, secure environment and reasonable protection for the campus community and the financial and material assets of the college. Depending on the position, employee background checks may include criminal history checks; credit history checks; social security number tracers; driving record checks; verification of past employment, education, credentials and professional licensures; and reference checks. Background checks as part of the employment process are intended to assess an external or internal candidate's suitability for a particular position.

Policy

Background checks will be conducted for faculty and staff new hires, including adjunct, and temporary employees (including camp instructors). Background checks may also be conducted where a current employee is a final candidate for a transfer or promotion. Departments may identify student and/or independent contractor positions that are subject to background checks as well. Volunteers may be subject to a background check when their activities bring them in direct contact with students. When hiring employees using an outside agency, the college may require the agency to conduct background checks, including criminal history checks.

- 1. Criminal history checks:** Criminal history checks are conducted to assess suitability for employment in the light of specific prior criminal convictions which raise a reasonable concern as to the College's potential to incur possible harm arising from the candidate's employment by the College. A candidate's criminal history will be reviewed initially by the Human Resources Director. If the record contains no relevant items of potential concern, the Human Resources Director or designee will so notify the supervisor. If the record does contain item(s) of potential concern, the Human Resources Director will review the information with the Vice President of the area, and the supervisor if deemed appropriate, before a final decision regarding employment eligibility is reached. Where the matter pertains to a candidate for a faculty position, the Provost conducts this review.

A prior conviction does not necessarily make an individual ineligible for employment, promotion or transfer. The criminal history will be evaluated for relevance, if any to the specific responsibilities of the position, considering, but not limited to, the following factors:

- A. Date of conviction(s) and time elapsed since conviction(s).
- B. Evidence of rehabilitation.
- C. Subsequent employment record.
- D. Falsification of application material pertaining to conviction(s).
- E. Length of service and performance history at the College (for transfers, promotions, continued employment).
- F. Number and gravity of the crimes committed and nature of the crime(s) in relation to the work to be performed.
- G. Potential opportunity in the position to cause financial or property loss or harm to others.

Where the college becomes aware of a past or current criminal conviction of a current employee, the situation will be evaluated using the same criteria listed above. In the event that an employee receives a criminal conviction after successful completion of the initial background check, that employee may inform the Human Resources Director or the Provost in order to determine whether the conviction is relevant to his/her position.

The college may conduct criminal history checks of current faculty and staff. Prior to any adverse impact on the employee, the employee will be given opportunity to respond to the findings, and the situation will be reviewed with the Vice President and, where deemed appropriate the supervisor. Where the matter involves a faculty member, the review will be conducted by the Provost and Department Chair and any actions taken will comply with the faculty remediation plan.

2. **Credit History Checks:** Credit History Checks will be conducted for final candidate(s) for positions that will handle substantial amounts of cash or have significant responsibility for college assets. An outside vendor may be used, and the college will comply with the Fair Credit Reporting Act. If there are findings of concern in the credit history report, the candidate will be given opportunity to respond and the findings will be discussed with the Senior Vice President and Chief Operating Officer, and the Chief Financial Officer and Vice President for Finance prior to reaching an employment decision.
3. **Driving Record Checks:** Driving Record Checks will be conducted for final candidates for positions that require driving College vehicles or that require driving a vehicle with students or other employees as passengers. Driving Record Checks will be conducted every two years for all employees who drive college vehicles or drive any motor vehicle with students as passengers. Faculty and staff whose positions require driving personal or college owned or rented vehicles are required to maintain an unrestricted, valid driver's license, appropriate insurance coverage and a driving record in accord with the college's driver policy. Staff or faculty who drive for college business must promptly report any changes in restrictions on their license or in insurance coverage to their supervisor and Human Resources.

- 4. Past Employment, Education, Degree, Certification and Licensure Verifications:** The Chair of the Search Committee or his/her designate will, prior to extending an offer of employment, make reasonable effort to verify information provided by final candidate(s) on his/her résumé, curriculum vitae and application form relating to past employment. This will usually be done in the process of reference checking. No candidates whose position requires a degree, certification, or license will be onboarded until the candidate provides proof of the required degree, license, or certification in a form acceptable to the college.
- 5. Reference Check:** The Chair of the Search Committee or his/her designate will, prior to extending an offer of employment, conduct reference checks for final candidate(s).
- 6. Social Security Number Tracers:** Social Security Number Tracers may be conducted as part of the Background Checks above to verify the identity of the candidate. An outside vendor may be used, and the college will comply with the Fair Credit Reporting Act.

Procedure

At the time of the initial employment interview, the employing department will notify the candidate of the college's employment background check policy.

1. A completed college application form authorizing a criminal history check and other applicable background checks will be obtained during the submission of application materials or by the hiring supervisor at the time the individual interviews for the position and forwarded to the Human Resources Office as part of the hiring paperwork. The Human Resources Office will retain these documents as part of the Personnel File or the applicant's record.
2. Upon notification by the department, Human Resources staff will then conduct the criminal history check and if required, a credit history and/or driving record check. In order to do this, the Human Resources Office will use a third party vendor to obtain the birth date, social security number, driver's license number if applicable, and gender of the candidate. In rare circumstances, a candidate may begin employment before the criminal history, and, if required, credit history or driving record is obtained. The offer may be rescinded based on the information obtained in the criminal history, credit history or driving record check.
3. The criminal history check will be conducted using records deemed appropriate, including, but not limited to, the Michigan State Police Internet Criminal History Access Tool (ICHAT), the Michigan Public Sex Offender Registry and similar tools for other states. A third party agency may be used to conduct the criminal history check and, if applicable, the credit history check and/or driving record check. If a third part agency is used, the college will comply with the Fair Credit Reporting Act.

4. If the criminal history check concludes that the candidate does not have a criminal history, and the credit history report and driving record, if required, do not contain items of concern, Human Resources will notify the hiring supervisor that the candidate is clear to work for Alma College.
5. If a criminal history exists, if the credit history report, if required, contains items of concern, and/or the driving record, if required, does not comply with college policy, or if information found is at variance from that provided by the candidate on the application form, the Human Resources Director will review the record with the candidate, giving the candidate opportunity to verify and reply to the findings. The Human Resources Director will discuss the situation with the supervisor, and if deemed appropriate with the Vice President, before a final determination regarding employment eligibility is reached. For faculty candidates the Provost conduct these reviews.
6. If an agreement cannot be reached, the Vice President will collaborate with the President in an effort to reach consensus prior to rendering a final decision. Options that may be considered include, but are not limited to, the following: employment, promotion/transfer, rescinded offer, denial of promotion/transfer, transfer to a non-sensitive position for which the employee is qualified, written reprimand, termination.
7. Reports, notes, memoranda or other documents used or relied upon regarding Employment Background Checks will be maintained and secured by Human Resources in separate confidential files.

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Approving Body: Cabinet