

CRIMINAL BACKGROUND SCREENING

APPLIES TO:

All authorized adults or program staff who work with minors in programs covered by the Policy on Minors Involved in University-Sponsored Programs or Programs Held in University Facilities (SPG 601.34).

FREQUENCY

- All authorized adults or program staff in sponsored University programs are required to submit to an initial criminal background screening. Full screening will be conducted for all persons directly interacting with children, whether in a supervisory capacity or not.
- Returning authorized adults or program staff are required to submit to a criminal background screening every two years.
- Criminal background checks must be completed and evaluated before the authorized adult or program staff may begin working with minors.

PROCESS FOR NON-UNIVERSITY PROGRAMS

Program administrators of Non-University-Sponsored programs are required to certify that they have conducted criminal background checks and have determined the fitness for all authorized adults and program staff before being allowed to use or lease university facilities. The University does not conduct background checks for Non-Sponsored programs.

PROCESS FOR UNIVERSITY-SPONSORED PROGRAMS

- Criminal background screening is administered by the Human Resources office on each campus, in consultation with Risk Management Services.
- Background screenings will be conducted through a third-party vendor, GIS. The vendor screening consists of a review of criminal records in counties where credit has been established during the past seven years (seven county limit, includes all aliases), Social Security verification, and the National Sex Offender Registry in compliance with the Fair Credit Reporting Act.
- Program administrators should submit requests for background checks via the [Children on Campus website](#). Required information:
 - o Month and year of last University-sponsored criminal background check, if applicable
 - o Program Name
 - o Name of program administrator
 - o Program administrator phone
 - o Program administrator email
 - o Candidate's legal first Name
 - o Candidate's legal last Name
 - o Candidate's valid email address

- Program administrators should instruct candidates to be alert to an email invitation from GIS (third party vendor) referring them to a secure website. Candidates will be required to create a username and password and authorize background check activities. To assist program administrators with planning, it is recommended that the candidate be instructed to notify the program administrator when authorization has been provided. A background check cannot commence until individual authorization has been received. If authorization has not been received within seven business days from the original invitation, the invitation expires and the program administrator will be notified.
- The process of completing background checks varies based on constraints imposed by jurisdictions involved. Human Resources will notify program administrators when the background check has been completed. Estimated turnaround/reporting time is as follows:
 - o Initiate process following request by program administrator: 3 days
 - o Completion of background check: 2 weeks after individual authorization has been received
 - o Notification of outcome to program administrator: 3 days

REPORT OUTCOMES FOR UNIVERSITY-SPONSORED PROGRAMS

- Human Resources will notify the applicant and program administrator of all checks receiving a "pass" designation.
- A report indicating that additional review is required will be evaluated consistent with SPG 201.95 Background Screening Policy at spg.umich.edu/policy/201.95
- Failure to disclose a criminal conviction that is verified through the university's background screening process is considered falsification and may result in the program or department denying the candidate's participation in the program.
- In compliance with the Fair Credit Reporting Act, candidates who believe their background screening shows an error have a minimum of five business days to dispute the content of the report to the vendor. The vendor conducts an investigation and may request additional information from the candidate to finalize the outcome. The vendor notifies the candidate and University Human Resources of the determination. No further action regarding the participation in the program may take place until after the dispute process is resolved.
- Refer to hr.umich.edu/procedures/spg201-95.html for information regarding appeal procedures.