**Enterprise Background Check Policy Template**

**PURPOSE:** To establish and document the (“YOUR AGENCY NAME”’s) policy regarding background checks of employees of contractors and/or subcontractors who will have access to “YOUR AGENCY NAME” owned data.

**SCOPE:**  This policy applies to employees of contractors and subcontractors, hired after the effective date of this policy, who have access to “YOUR AGENCY NAME” owned data.

# ROLES & RESPONSIBILITY

This section will provide summary of the roles and responsibilities as described in the Statement of Policy section. The following Roles and Responsibility Matrix describe 4 activities:

1. Responsible (R) – Person working on activity
2. Accountable (A) – Person with decision authority and one who delegates the work
3. Consulted (C) – Key stakeholder or subject matter expert who should be included in decision or work activity
4. Informed (I) – Person who needs to know of decision or action

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Roles** | Information Security Officer | Hiring Manager | Certain Agencies | “YOUR AGENCY NAME” HR |
| **Tasks** |  |  |  |  |
| OBTAIN THE BASIC ACCESS LEVEL INFORMATION |  | A/R |  |  |
| VERIFICATION OF INFORMATION RECEIVED |  | A/R |  |  |
| SPECIFY ADDITIONAL REQUIREMENTS TO BASIC ACCESS LEVEL. | C |  | A/R |  |
| ADJUDICATE THE BACKGROUND INFORMATION | C | I |  | A/R |
| SUBMIT BACKGROUND INFORMATION FOR ACCESS LEVEL RENEW |  | A/R |  | C |
| SUBMIT CHANGE REQUESTS |  | A/R |  |  |
| SUBMIT APPEAL TO ADJUDICATION RESULTS |  | A/R |  | C |

STATEMENT OF All employees of contractors and subcontractors must pass the

POLICY: background check defined in this policy prior to being granted access to “YOUR AGENCY NAME” owned data. The “YOUR AGENCY NAME” Enterprise Background Check Policy contains multiple access levels, which are consistent with the requirements of their job. Before any employee of a contractor or subcontractor is granted an access level, all requirements associated with that access level must be met.

**Access Levels**

The following are the levels of access available, the requirements necessary to meet those levels, and the process to obtain them:

Basic Access Level

1. Employment check of all employers for the preceding seven (7) years (at a minimum, if available);
2. Check a minimum of three (3) references;
3. Verification of listed certifications as required for each position;
4. Verify the highest or most recent college degree relevant to the position;
5. Perform a drug test for controlled substance use and
6. Virginia State Police and Federal Bureau of Investigations fingerprint background checks to identify all local, state, or federal misdemeanor or felony convictions and pending criminal charges during the preceding seven (7) years (at a minimum)

To obtain the basic access level the following information must be submitted to “YOUR AGENCY NAME”:

* 1. Verification from the hiring manager that items a through f above have been completed, with appropriate artifacts and
  2. The results of the fingerprint background check.

NOTE: To obtain a fingerprint background check the employee must have fingerprints taken by “YOUR AGENCY NAME” , Virginia State Police or a local police station. A blank fingerprint card must be obtained from “YOUR AGENCY NAME” HR. Once the form has been completed it must be returned to “YOUR AGENCY NAME” HR for processing.

Special Access Level(s)

Certain agencies may specify additional requirements to those of the basic access level. These requirements should be specified in the Memorandum of Understanding (MOU) between “YOUR AGENCY NAME” and the agency. Required information for a special access level should be forwarded to the contact designated by the agency and the results forwarded to “YOUR AGENCY NAME” when complete. Employees of contractors and subcontractors may apply for multiple special access levels.

**Adjudication**

Once all the information is submitted, “YOUR AGENCY NAME” will adjudicate the background information. The results of the adjudication will be reported to “YOUR AGENCY NAME”.

Any of the following criteria could result in a candidate failing the adjudication process:

1. A felony conviction involving violence or larceny in the past ten (10) years
2. Any other felony conviction within the past five (5) years
3. Any sex offense conviction
4. A misdemeanor conviction involving violence, larceny, or violation of a protective order in the past three (3) years
5. Outstanding warrants
6. Pending charges (at Agency’s discretion)
7. Active protective orders (at Agency’s discretion)

The above guidelines may not be the only criteria used to evaluate candidacy. Trends of troubling behavior or misdemeanors may also lead to further scrutiny and ultimately result in the candidate failing the adjudication process.

**Access Level Renewal**

Background information necessary for an access level renewal should be submitted to “YOUR AGENCY NAME” by the hiring manager or the employee’s manager in conjunction with the access renewal request. Access levels are effective for seven (7) years from approval date. Where the employee of the contractor or subcontractor has received approval prior to the date of this policy, that approval shall remain effective for seven years after the date of the policy, unless the employee leaves the employment of the contractor or subcontractor or takes on duties that require an additional background check.

**Access Level Changes**

Change requests must be submitted to “YOUR AGENCY NAME” by the hiring manager or the employee’s manager with the new information and any forms required.

**Adjudication Appeals**

Appeals to the results of adjudication must be submitted to “YOUR AGENCY NAME” by the hiring manager or the employee’s manager within 30 days of the rejection. If it is necessary to discuss the situation with the employee, “YOUR AGENCY NAME” will notify the party submitting the appeal that further discussion is necessary. A time will be scheduled where both the employee and the party submitting the appeal will be available. The results of the adjudication review will be returned to the party who submitted the appeal.

ASSOCIATED

POLICY/

PROCEDURE: *“YOUR AGENCY NAME” Enterprise Background Check Policy*

AUTHORITY

REFERENCE:

OTHER

REFERENCE:

| Version History | | |
| --- | --- | --- |
| Version | Date | Change Summary |
| 1 | 01/15/2014 | Original document |
| 2 | 11/10/2021 | Formatting changes |