

	UNIVERSITY OF DENVER POLICY MANUAL BACKGROUND CHECKS
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Responsible Department: Office of Enterprise Risk Management

Policy Number
RISK 12.10.020

Effective Date

Recommended By: Senior Vice Chancellor for Business and Financial Affairs, Executive Director of Enterprise Risk Management, Vice Chancellor for Human Resources

Approved By: Chancellor

I. INTRODUCTION

This Policy establishes the circumstances under which the University will conduct for employment at the University, serving in a particular position, or engaging in certain activities, and the processes that will be followed to promote fair treatment of candidates, employees, and other individuals with respect to background checks.

II. POLICY OVERVIEW

The University strives to provide a safe learning, working, and living environment for its faculty, staff, volunteers and students. To support this environment and comply with applicable laws and regulations, the University conducts background checks as set forth in this Policy. The type of background check conducted varies by position and can include, but is not limited to, criminal history, sex offender registry, motor vehicle driving history, financial history, and/or verification of education and other credentials. The University will also conduct background checks when required by law or contract and when, the University in its sole discretion, deems it is reasonable and prudent.

III. PROCESS OVERVIEW

A. Required Background Checks:

1. New Hires: The University conducts the following background checks on all newly hired or rehired individuals: (a) a Social Security Trace; and (b) a criminal history.
2. Position specific: Prior to an employee starting in certain positions or

undertaking certain duties, the University may require additional background checks, including one or more of the following:

- a. Verification of education, employment, and/or other credentials;
 - b. Financial history;
 - c. Motor vehicle record;
 - d. Sex offender registry; and/or
 - e. Office of Foreign Assets Control screening.
3. Non-Employees: Except as noted below, the University requires a background check as described in Section III.A.1 above for individuals offered volunteer opportunities, participating in a clinical practicum in a University degree program, or designated as Special Community Members prior to engaging in such activities when the position meets one or more of the following sensitive conditions:
- a. Interacts with students or minors;
 - b. Conducts on-campus research;
 - c. Has unsupervised access to residence halls or secure facilities;
 - d. Has access to controlled substances (as defined in the Controlled Substances Act, 21 U.S.C. 801 et. seq.), select agents or other sensitive research materials/information;
 - e. Has access to animals;
 - f. Has access to sensitive information;
 - g. Has cash handling responsibilities; and/or
 - h. Requires a background check to participate in a clinical practicum.

The only exception to this requirement is when a vendor with a contractual relationship with the University completes the background check as specified in the contract, such as Aramark, Sodexo, AimHire, and the Denver Art Museum (DAM).

4. Break in Service/Rehires: The University will conduct a new background check when

false or misleading information may be disqualified from further consideration. A final offer of employment is contingent on the successful completion of the background check. If the University subsequently learns that a candidate or employee provided false or misleading information related to the background check, the University may subject the employee to disciplinary action up to and including termination.

2. For non-employees for which a background check is required to participate _____), the University will require the non-employee to consent to a background check prior to participating in the covered activity. Failure of a non-employee to consent to a background check will disqualify the individual from participation in the covered activity.
- C. The University retains the right to conduct background checks of current employees when the University has reasonable grounds to do so and when

has submitted information as set forth in Section III.E.1 or the time for submitting such information has lapsed.

3. Adverse Employment Decision/Participation Decision

background check to participate.

E. Contractor is an individual, business, or corporation that provides goods or services to another entity under terms specified in a written agreement.

F. Criminal History Check is the process of gathering and reviewing criminal

address, passport number, and computer account/password information; and