# Background Check, 4.15 Policy Revision

Summary of Changes Effective January 3, 2021

# **Summary of Substantive Changes**

- Consolidated background check office between university and Medical Center and aligns practices, with divergences specified. The consolidation will result in a streamlined and more efficient process across both university and Medical Center.
- Deleted international background check exception for visa candidates.

## **Individual Substantive Changes**

## Policy (Page 1)

- Deleted all language referencing unit specific background check programs.
- Added "Non-employees" to the "Applies to" section.
- Deleted "Appointees" and "when covered by an approved unit background check program" from the "Applies to" section.

#### **Definitions (Page 1)**

- Revised definitions: "Background check," "Background check coordinator (BCC);"
- Added "Health system," "Interim position," "Non-employee," "The Ohio State University Wexner Medical Center (Ohio State Wexner Medical Center)," "Third party staffing vendor," and "Unit;"
- Deleted "Appointee" (Definitions, p. 1)

#### Policy Details (Pages 2-3)

- Added link to Affirmative Action, Equal Employment Opportunity & Non-Discrimination/Harassment policy. (Policy Details I.C. p.2)
- Revised and reorganized the list of final candidates for whom background checks will be required. (Policy Details II B. p. 2)
- Added section regarding background check requirements for non-employees. (Policy Details II.C, p. 2)
- Added section requiring background checks for non-student residents. (Policy Details II.D, p. 2)
- Revised language regarding background check requirements for individuals with access to restricted institutional data. (Policy Details II.E, p. 2)
- Revised language regarding background check requirements for internal candidates, including candidates for interim positions. (Policy Details II.F, p. 2)
- Revised language regarding background check requirements for those who have a break in service. (Policy Details II.G & H, p. 2)
- Added links to the policies which may have additional background check requirements for individuals who are subject to those policies. (Policy Details II.J, p. 2)
- Made minor language revisions to self-disclosure requirements. (Policy Details III, p. 3)

#### (Continued on page 2)





## Procedure (Pages 3-7)

- Consistent with state law, and current practice, added language permitting Public Safety to conduct background checks for university criminal justice employment and administration candidates. (Procedure II.A, p. 3)
- Clarified that background checks required to maintain regulatory compliance for university research safety, radiation safety, and biosafety will be conducted and adjudicated by Environmental Health and Safety as set forth in the <u>Federal Select Agent Program</u>. (Procedure II. B. p. 3)
- Added language requiring units to request and receive approval by the Background Check Coordinator and the
  Office of Legal Affairs prior to processing the background checks that are not mandated by the policy. (Procedure
  II.C, p. 3)
- Revised language regarding third party staffing vendors that conduct background checks. (Procedure II.E, p. 4)

#### Responsibilities (Page 5)

 Made changes consistent with the consolidation of Background Check Responsibilities with the Background Check Coordinator, and consistent with revised language.

## Resources (Page 5-6)

Lists all resources.

# Contacts (Page 6)

Lists all offices referred to in the policy and their contact information. Added HR Connection