



## Background Investigation Policy

### Policy:

HRST, Inc. is committed to good, ethical business practices in all aspects of its operations and establishes the Background Investigation Policy in accordance with that commitment. It is the policy of the company that employees be qualified for employment or assignment with a client by successfully passing a background investigation search.

The expanded requirements of clients and various governmental entities relative to their consultants and subcontractors oftentimes require a background check. This policy places the company in compliance with such requirements, laws, mandates, and associated contractual obligations. The policy helps protect the company from liability and insurance related risks.

This policy is posted on official company bulletin boards, including the electronic Sharepoint Bulletin Board.

### Practice:

HRST will conduct a pre-employment or pre-work assignment Background Investigation check at the company's expense. Employees will be required to sign a release to obtain background information.

### Procedure:

A records check will be conducted by contacting the appropriate agency of record such as statewide repositories. The following will be checked:

#### Background Investigation Criteria:

- State criminal history – States of residence for the past 7 years, searching records as many years back as available in those jurisdictions.
- Sexual Offender Registry – States of residence for the past 7 years, searching records as many years back as available in those jurisdictions.
- Driver's License report – state where license is currently maintained.
- Social Security number search.
- Global Watch – Special Designated Nationals and Blocked Persons List, or other watch lists in accordance with the Patriot Act, e.g. Terrorist Watch List.

#### Discretionary background search criteria:

- Employment verification – two employers or last 5 years.
- Education verification – highest level completed.
- Special certificates or licenses (CDL, FAA, etc.)

#### Disqualification Standards for Background Investigations:

- Felony conviction.
- Misdemeanor conviction.
- DUI convictions – two in past 5 years.
- Incident of workplace violence.

- Willful omission, misrepresentation, or falsification of personal data provided for background investigation purposes (such as omitted criminal convictions, falsification of degrees, etc.).
- Unauthorized to work in the United States of America.
- Pending or unadjudicated charges that, if resulted in a conviction, would disqualify the candidate for any of the foregoing reasons.
- Currently on probation for charges related to any of the foregoing behaviors.
- Suspended or revoked driver's license for any position which requires driving.
- Named or designated as a national or blocked person by the U.S. Office of Foreign Asset Control.

To assist in making appropriate determinations, see Appendix I that identifies several types of adverse information. This is not all inclusive, but contains many of the factors which may raise legitimate questions regarding the employee's eligibility for employment or assignment with a client.

**Responsibility:**

It is the responsibility of the Human Resources department and supervisors to administer this policy in conjunction with one another. It is up to each individual employee who may be subject to a background investigation search based upon a client's policy or project requirements to be aware of such policy or requirements, and to be prepared to submit to a search.

**Receipt and Acknowledgement:**

I have read the above Background Investigation Policy and agree to abide by the terms and conditions of this policy:

Applicant/Employee (First, Middle, Last):	Date:	
Applicant/Employee Current Residence:		
Applicant/Employee Drivers License #:	Exp Date:	
Applicant SSN:	DOB:	
HR Representative:	Date:	

Please provide 7 years of previous residential history, permanent and/or temporary

City:	State:	Zip:
City:	State:	Zip:
City:	State:	Zip:
City:	State:	Zip:
City:	State:	Zip:

Signature	Date:
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## APPENDIX I

### REJECTION CRITERIA TO DISQUALIFY CANDIDATES FOR EMPLOYMENT OR ASSIGNMENT WITH CLIENT

#### A. FELONY CONVICTION:

CRITERIA FOR REJECTION	ACTIONS TO BE CONSIDERED
Any felony conviction within the last 5 years	Not eligible for employment or assignment for 5 years from the date of conviction.
Persons currently on active probation/parole or a work furlough program for a felony conviction or participating in court diversion program for charges which would meet rejection criteria. (e.g., pre-trial intervention and deferred prosecution.)	Not eligible for assignment until completion of probation or parole or court diversion program. Eligibility must also comply with criteria above. (i.e., as if convicted.)
Failure to fulfill a court order (i.e., failure to appear) for any felony conviction	Not eligible for employment or assignment until the disposition of court order is completed.

#### B. MISDEMEANOR CONVICTIONS

CRITERIA FOR REJECTION	ACTIONS TO BE CONSIDERED
Any misdemeanor conviction within the last 5 years involving illegal drugs (includes individuals currently serving a court-ordered diversion program.)	Not eligible for employment or assignment for 5 years from date of last conviction.
Any misdemeanor conviction within the last year involving violence or theft.	Not eligible for employment or assignment for one year from the date of conviction.
Two or more misdemeanor convictions involving alcohol, violence or theft within the last 7 years. (e.g., convictions in 11/2007, and 11/2008 and 4/2009 not eligible until 11/2015.	Not eligible for employment or assignment for 7 years from the date of earliest conviction
Persons on active probation/parole or a work furlough program for a misdemeanor conviction or participating in court diversion program for charges which would meet rejection criteria ( e.g., pre-trial intervention and deferred prosecution.)	Not eligible for employment or assignment until completion of probation or parole or court diversion program. Eligibility must also comply with criteria above. (i.e., as if convicted.)
Multiple misdemeanor convictions; including, but not limited to acts of violence, alcohol, and theft that	HRST will exercise reasonable discretion to determine appropriate action on a case by case

demonstrate a pattern of continued disregard for the laws of the land and adversely reflects on the person's reliability and trustworthiness.	basis.
Failure to fulfill a court order (i.e., failure to appear) for any misdemeanor conviction.	Employment or assignment may not be recommended based on the severity of the court order.

C. Other

CRITERIA FOR REJECTION	ACTIONS TO BE CONSIDERED
Any other information that would adversely reflect upon the reliability and trustworthiness of the person as it relates to employment or assignment to client work.	Determined on a case by case basis.
Prior termination for policy or performance violations or issues.	Not eligible for employment or assignment.
Information regarding denial at any client's facilities	Employment may not be recommended based on reason for denial.
Social Security Number not verified by Social Security Administration	Not eligible for employment or assignment until verification of Social Security Number is validated.

## **APPENDIX II**

### **KEY TERMS**

**PENDING** – As used in criminal or charges “pending” is defined as awaiting formal review by the court to determine the disposition of the arrest. All pending charges will be evaluated on a case by case basis; however, pending charges which may meet the company’s criteria for disqualification if convicted will normally preclude an acceptable recommendation.

Charges which result in a disposition or adjudication withheld, nolle pross, pre-trial intervention, prayer for judgment continued or are otherwise unadjudicated shall be evaluated on a case by case basis. This evaluation shall focus on the status of the charge, and the behavior or incident which resulted in the charge being made, and the effect on an applicant’s trustworthiness and reliability.

**CDL** – Commercial Driver’s License

**FAA** – Federal Aviation Administration license

**CLIENT** – An external company or entity that contracts for HRST services, products, benefits or professional advice. This definition also includes prospective clients, meaning any companies that HRST is involved in considering performing any services, sale of products or providing professional advice.