

Policy for Background Investigations

Policy Statement

For the safety of children, the well being of the community, the integrity of the Church and to hire the most qualified employees, it is the policy of Diocese of Alexandria to conduct background investigations on all, but not limited to seminarians, clerics, religious and lay church workers, paid or commissioned volunteers, and certain subcontractors. (Cf. USCCB Charter, Art. 13)

Policy Guidelines

- I. Background investigations cannot be conducted on employees who are under eighteen (18) years of age.
- II. Types of background investigations are conducted:
 - A. Seminarians, clerics, religious and lay church workers, paid or commissioned volunteers
Background/Screening (conducted on all current and new volunteers and employees)
 - a. Social Security Number – Reveals the names and addresses associated with a Social Security Number (SSN) using credit bureau records. The SSN Trace provides the essential information necessary for other services and can detect an incorrect or compromised SSN.
 - b. 7 Year Criminal Record Search - a search in every civil parish/county in which the person lived in the past seven years, traced by his/her social security number.
 - c. Sex Offender Search - State level search to access available subjects who are registered sex offenders.
 - d. Motor Vehicle Reports (MVR) – Reports on Driver’s License validity, driving violations and suspensions. An MVR will be conducted on any individual that operates a diocesan vehicle or who is insured under the diocesan auto insurance policy. This includes individuals who are using rental cars for business purposes.
- III. Appropriate background screening must be conducted on all candidates for ordination (cf. National Conference of Catholic Bishops, Program of Priestly Formation, 1993, no. 513). In addition, the Diocese must conduct background screening on all seminarian and deacon candidates. This background screening also applies to all current clerics and deacons.
- IV. Appropriate background screening must be conducted on all new employees and potential commissioned volunteers of the Diocese of Alexandria as a condition of employment. This background screening also applies to current employees and commissioned volunteers.
- V. No applicants or volunteers can be hired until results of the background investigations have been received.
- VI. Background investigations on any individual must be conducted for an employee/volunteer who is **rehired more than 60 days** after his/her termination regardless of his/her previous position with the Diocese of Alexandria.

Procedures

- I. The applicant completes the Application for Employment and the applicable Background/Screening Release Form. The Interviewer reviews the Application for Employment for completeness.
The potential volunteer completes only the appropriate Background/Screening Release Form.
Incomplete applications are not processed.
- II. The interviewer thoroughly reviews completed applications.

- A. If any misdemeanor or felony convictions are listed on the application and the candidate appears qualified in all other areas, the assigned individual must contact the individual assigned to compliance to request that the applicant be considered for employment despite the criminal conviction(s). Note: an **arrest record**, as opposed to a **criminal conviction**, is not a factor that can disqualify an applicant from employment.
 - B. The individual assigned to compliance will review the convictions listed and consult with the Director of Personnel, if necessary, to decide whether to proceed with the background investigation or not to hire the applicant. The Director of Personnel will consult with legal council and will consider the nature of the criminal offense, its job relatedness, and the timing in determining whether a criminal conviction disqualifies the applicant from employment with the Diocese of Alexandria.
- III. To complete the background investigation for both employees and volunteers, the interviewer must follow these procedures:
- A. Upon completion of the appropriate Background/Screening Release Form, the interviewer will fax the completed form to the attention of the Director of Personnel at the diocesan office.
 - B. The Director of Personnel or an assigned individual will log on to the HireRight website, input the individual's identifying information (name, SSN, DOB, Address) and select the appropriate screening options from the menu.
- IV. Once the appropriate background screening has been fulfilled:
- A. Only the Director of Personnel and his express designee will have access to the results via the web.
 - 1. The following are results and procedures that the Director of Personnel should follow.
 - a. **Clear:** If the result of the "Background Investigation" has no basis for denying employment or work as a volunteer, the Director of Personnel or an assigned individual will communicate to the interviewer that they may offer employment or work as a volunteer to the individual. File a copy of the individual's report in the "Background Investigations" file.
 - b. **Hit:** If the result of the "Background Investigation" has basis for denying employment or work as a volunteer, the Director of Personnel or an assigned individual will send out a copy of the applicant's report along with the "Summary of Rights Under the Fair Credit Reporting Act", to notify the candidate of his/her legal rights. The consumer department at HireRight will handle all disputes. If the individual provides information that some or all of the report is inaccurate, the initial decision to not hire the individual must be reevaluated based on the new information. No earlier than five days later, the Director of Personnel or an assigned individual will send out an Adverse Action Letter notifying the applicant of his/her ineligibility for employment or notifying the volunteer of his/her ineligibility to volunteer.
 - B. Each report will be filed in a designated confidential file, which may be accessed only by the Director of Personnel or his express designee, the Bishop or his express designee, or the Vicar General. The information may be used only as permitted by law.
- V. If the background investigation of a current employee/volunteer reveals a conviction not formerly disclosed to the Diocese of Alexandria, the employee's employment or the volunteer's volunteer work may be terminated based on the timing and scope of the conviction. The Director of Personnel, and as needed, legal council will consider the nature of the criminal offense, its job relatedness, and the timing in determining whether the results of the background report disqualifies the individual from employment or participating as a volunteer with the Diocese of Alexandria. An Adverse Action Letter stating this reason is provided to the employee or the volunteer.