

Chapter:	Human Resource Management		
Title:	Credentials Verification and Background Checks		
Policy: <input checked="" type="checkbox"/> Procedure: <input type="checkbox"/>	Review Cycle: Triennial Author: HR	Adopted Date: 08.2020 Review Date: 3.2024	Related Policies: Arrest and Convictions Compensation and Executive Compensation Complaint and Appeals Equal Employment Opportunity Employee Separation Recruiting and Hiring Professional Licensure Progressive Discipline Supervision Volunteers

Purpose:

Hopeful Horizons (HH) seeks to assure all employees, prospective employees and volunteers are in good standing with required professional credentials, education, licensure and are of good moral character and in compliance with the law. This policy establishes the requirement for primary source credentials verification and specified background checks.

Scope:

This policy applies to:

- All HH Staff Selected HH Staff, as specified:
 HH Board Members HH Volunteers
 Other: Prospective employees, Students and Interns and Service/Treatment Contractors

Policy:

HH shall establish procedures and practices to assure appropriate primary source verification of credentials (as required) and background checks are conducted as a condition of employment, approval of a volunteer position or appointment to HHs' Board of Directors. Primary source verification of licensure (as required) and specified background checks shall be conducted at least triennially thereafter.

A. Roles and Responsibilities:

1. Chief Executive Officer (CEO) shall:
 - Recommend related policies to HHs' Board of Directors
 - Require and receive reports of findings resulting from primary source verification and background checks
 - Use required information to inform decisions related to hiring, ongoing employment, volunteer appointment and acceptance of students/interns
2. Human Resources (HR) shall:
 - Establish detailed procedures for conducting credentials verification and background checks
 - Complete primary source verification and background checks in a timely manner
 - Maintain related records in a secure and confidential manner consistent with approved personnel records procedures

- Provide timely notice of adverse findings to the hiring supervisor and the CEO
3. Employees/Prospective Employees, Volunteers, Students and Interns shall:
- Provide accurate and timely notice of changes or adverse actions in credentials or legal standing to the immediate supervisor and HR
 - Provide necessary releases or make appropriate requests for release of required information.
- B. Required Credentials Verification and Background Checks: HR shall establish procedures for and conduct the following as specified:
1. **Official Transcript**: When a specific level of education and/or degree is required for a position, HR shall complete primary source verification by requesting an official transcript from the awarding institution specified in the employee's application for employment/contractor's resume; or when the employee seeks a change in compensation related to degree completion consistent with HHS' [Compensation and Executive Compensation](#) policy
 2. **Professional Licensure**: When a specific level of professional licensure is required for a position, HR shall complete primary source verification that the licensure is valid, current and unrestricted as specified in the employee's application for employment/contractor's resume; or when the employee seeks a change in compensation related to award of licensure. Employee's/contractor's working with less than full licensure shall comply with the supervision required by the state of South Carolina and in accordance with HHS' policies on [Supervision](#) and [Professional Licensure](#). Primary source verification of licensure for all positions/employees and service/treatment contractors requiring licensure shall be conducted triennially or when HR receives notice of a licensure change
 3. **Background Checks**: HR shall conduct the following background checks when appropriate and as required for the position. Background checks shall be conducted as a condition of employment and at least triennially thereafter or upon notice of a change in status.
 - The following background checks are required for all prospective employees, volunteers, students, interns and volunteers prior to starting work and triennially thereafter:
 1. South Carolina State Law Enforcement Division (SLED) - state criminal records
 2. South Carolina Department of Social Services (DSS) – central registry for child abuse and neglect
 3. National Sex Offender Public Website – registered sex offenders
 - Federal Bureau of Investigation (FBI): Federal criminal history checks are completed on a position specific basis. Employees requiring this level of background check shall receive a conditional offer letter pending any findings. When required, the new employee shall sign consent for the release of information during initial orientation.
 - For any employee required to drive an agency vehicle as a function of their job, South Carolina Secretary of State: Valid and unrestricted driver's license

as requested and determined by HHs' automobile insurance carrier (the employee must be insurable).

- Reference Checks: Prospective employees, as part of the application process, shall provide three professional references that can be contacted by HH.
- C. Consent to Obtain Information: All persons for whom HH is required to complete credentials verification or background checks shall provide required consent as a condition of employment of volunteer opportunity.
- D. Documentation: HR shall document all credential verification and background check information as required by related procedures. Supporting evidence shall be retained in the personnel/volunteer file.
- E. Response to Adverse Outcome/Finding: HR shall notify the hiring supervisor (and the CEO as indicated) upon notice of an adverse credential verification or background check outcome. HR and the hiring manager shall decide on an action to be taken and notice to be given. Action could result in no offer of employment or progressive discipline up to and including termination for an existing employee.
- F. Nondiscrimination: In accordance with HHs' Equal Employment Opportunity policy, while hiring and employe retention decisions shall consider the findings of background checks, they may not be used in a discriminatory fashion.
1. Applicants/employees having similar arrest and conviction history shall be treated in a consistent manner regarding that finding.
 2. HHs' shall demonstrate any criminal record exclusion disproportionately excluding people of a particular race or national origin, are job related and consistent with business necessity.
- G. Appeal of Finding: A prospective or current employee may appeal a decision or action taken by HH related to the findings from the credential review and/or background check process. The Universal Complaint and Appeal Process shall be used to submit and appeal.

Communication and Training:

The Board shall receive a copy of the policy at the time of periodic review and will have an opportunity to ask clarifying questions during the approval process. Employees and volunteers shall receive notice of the Board's policy review and approval including notice of any substantive changes. The notice will provide a link to the policy located on the HH website.

New staff to the HR department shall receive additional orientation to this policy and additional ongoing training as required to implement the function.

Definitions:

1. Adverse Outcome/Finding: For purposes of credential verification and background checks, an adverse outcome is a finding/report that substantiates wrongdoing inclusive of criminal activity, misstatements in the application/interview process, or failure to report a criminal conviction or driving restrictions.
2. Primary Source: A primary source is the original source of a specific credential that can verify the accuracy of a credential reported by an individual professional, which means verification

is received directly from the issuing source. An example of Primary Source Verification would be when an organization receives information on graduation directly from the college or university, not a copy of the diploma from employee/prospective employee.

Other Related Materials:

Primary Source Credential Verification and Background Check Procedure

Primary Source Credential Verification and Background Check Worksheet

References/Legal Authority:

[Enforcement Guidance on the Consideration of Arrest and Conviction Records in Employment Decisions Under Title VII of the Civil Rights Act, US EEOC, 2024.](#)

[Human Resource Standards \(HR2.03 2.05, 2.06\), Council on Accreditation, 2023](#)

Change Log:

Date of Change	Description of Change	Responsible Party
4.2024	Updates the policy to include primary source verification of credentials; updates to the new template; and adds communication and training, definitions, other related materials and resources.	R. Lucovich, HR Spec.