Columbia University Medical Center (CUMC)
Guidelines for Background Checks for Administrative Employees

The University is committed to providing and ensuring a safe and secure environment for all CUMC administrative employees of the University community and its property. As part of this mandate, background checks are now a required part of the pre-employment hiring process for all CUMC prospective employees which include any new Officers of Administration, Union/Non Union Support Staff and Casuals prior to their start date. This will also include all internal transfers and promotions above grade 105 or that requires additional verifications specific to the position. The use of information obtained by this policy will be in compliance with all applicable laws.

Scope of Background Check:

A background check is recommended as soon as you have made a conditional offer of employment to a finalist and they should not begin employment until you have received notification from CUMC HR Department that a background check is completed and verified. In certain circumstances, you may need to provisionally bring a finalist on board prior to receiving the final clearance from CUMC HR. It is the responsibility of the department, center, or administrative unit to ensure that all prospective employees, internal transfers and promotions complete all required verifications, prior to their start date. Please consult with your designated HR Client Manager for further guidance.

As previously indicated, below is a list of CUMC prospective employees who are required to undergo a background check:

Officers of Administration:
All grades

Union/Non Union:
All new hire union/non-union positions

Casuals:
All new hire casuals providing service will be required to undergo a background check. If a background check was not conducted as a casual and they are now obtaining a regular position at CUMC, then a background check will be required as a result of this new initiative.

Internal Transfers/Promotions: (CUMC Administrative Staff)
If a current employee is being promoted or transferred into a grade above 105 or that requires additional verifications specific to the position with no break in service, then the following situations may occur:
• If the employee previously had a background check conducted then **ONLY** items that may pertain to the nature of the work the employee will be conducting, will be verified. *For example, if an employee was being promoted to a driver and a driver’s license with no violations will be required, you would only request the DMV verification through the background check process.*

• If the employee did not have a background check conducted at the time of hire then a full background check would be required.

• If the position falls under the Joint Commission mandates (see Direct Contact in NYP Requirement).

### Process and Procedures:

Sterling InfoSystems has designed their system to accommodate the needs of Columbia University.

You must enter the candidate’s information directly into the system using the resume and application as reference. When entering the candidate’s information, please ensure that you verify a minimum of 7 years of employment (unless the applicant has a work history of less than that) and only the highest level of completed education. If your candidate has worked or attended school at Columbia University, please do not request verification of this information through the Sterling Direct System, as CUMC HR will be able to verify that information and results in cost savings for the institution. Simply send an email to CUMC HR Operations with the name of the applicant, date of birth and employment/education dates, including highest level of degree obtained.

You also have the capability to use the option to invite your candidate to enter the information themselves. If you choose this option, you will have to review the information that is sent back from your finalist and initiate the final release of the candidate’s information to Sterling directly. This is to ensure that there is no falsification of information with comparison to the application and resume that the finalist has submitted to Columbia University.

### Submitting a Background Check:

There are two categories to choose from when submitting a background check in the Sterling Direct System. Once you have logged onto the system, you will notice on the far left, a tab indicating “Order Management”. You will select the “Place an Order” option. The first category is “Full-Time Employee Package”, which will include the verification of Employment, Education, Criminal and Social Security Trace. This, in almost every case will be the option that should be selected. The other rare option would be “A La Carte”. This option is **ONLY** to be used in the following scenarios:

• If there was a break in service and during that period of time the finalist was employed elsewhere, then, an employment verification would need to be conducted as well as a criminal history check.
• If a finalist has previously conducted a background check and under certain circumstances a special requirement of the new position requires an additional verification (i.e. DMV verification).
• For background checks that may require further verifications such as credit checks, please consult with your CUMC HR Client Manager.
• If the highest level of completed education was obtained at Columbia University, you can use the “A La Carte” to only verify employment, criminal and Social Security trace, as CUMC HR will be able to verify the education without an associated cost.
• Please be advised that unnecessary verifications may result in a charge back to the department initiating the background check.

Direct Contact in NYP Requirement:

Any employees (Officers of Administration, Union/Non Union Support Staff, including those Casuals and Visitors) of the Medical Center, providing service at New York Presbyterian Hospital (NYP) must be compliant with the Joint Commission mandates.

The Joint Commission mandates are applicable to all employees/students who have direct contact in NYP through the delivery of treatment, the conduct of evaluation, the enrollment of patients in studies, or the collection of data or specimens, must comply.

- Requirements for New Employees who fall under the Joint Commission guidelines:
  - Candidate/Prospective Employee’s Resume
  - CU Employment Application
  - Background Check
  - Pre-employment Physical (through Workforce Health & Safety)
  - Drug Screening-(Officers/Non Union Support Staff will receive a drug screening under the medical surveillance protocol)
  - License Verification (if applicable)
  - Departmental Orientation

Visitors (Volunteers, Observers and Trainees) Research/Clinical/Administrative:
If any Visitor meets the Joint Commission requirements then a background check and drug screening will be necessary to comply with the mandate.

Students:
Under the Joint Commission mandate, any Students including CU Students that fall under the requirement must submit to a background check and drug screening.
Responsibilities of the Hiring Department:

The department is responsible for:

- Properly identifying positions subject to a background check and determining the appropriate level of verification required.
- Providing your finalist or current employee, in the case of an internal transfer or promotion, with a Consent and Disclosure form and obtaining his/her signature as authorization to begin conducting the background check. Consent and Disclosure forms can be found on the Sterling Direct portal located at https://portal.sterlingdirect.com/.
- Submitting the finalist’s demographics into the Sterling Direct system or inviting the finalist to complete the information themselves. Then, verifying the information is accurate once it is completed by the finalist. The final step would be to release the information directly to Sterling to begin the verification process and faxing over the signed Consent & Disclosure form.
- If CU employment/education needs to be verified by CUMC HR, an email indicating the candidate’s name, date of birth and employment/education dates, including highest level of degree obtained must be sent to CUMC HR Operations.

Responsibilities of CUMC HR:

Upon obtaining the results of the background check, CUMC HR will notify the hiring department. CUMC HR staff will review all background check results in comparison with the application and resume and will notify the department that the individual has “cleared” or “not cleared” the check.

If the individual does “CLEAR” the background check, the appropriate hiring department will be notified and the hiring process may proceed.

If the individual does “NOT CLEAR” the background check, the department will be notified by CUMC HR that the individual did not clear the check and that the department shall not make the final offer of employment. The department will be advised to contact their CUMC HR Client Manager for further discussions and next steps.

If the applicant previously worked for Columbia University, employment verification will be conducted by CUMC HR from past departments the individual worked for.

Adverse Action Process:

In the event that a hiring department receives a “NOT CLEAR” notification from CUMC HR, the following steps can be taken after following up with your CUMC HR Client Manager.

- CUMC HR will identify what the disqualifying information is by comparing the application and resume against the results.
- The department in collaboration with the CUMC HR Client Manager will initiate one of the following two things:
a. CUMC HR will request that Sterling InfoSystems generate a Pre-Adverse Action letter along with the applicant’s Consumer Report, disqualifying information and also a print out of the Summary of Rights for the individual and send it out via overnight mail.

- The applicant will have approximately 5 business days to contact Sterling either through email or phone. The pre-adverse action letter indicates how the applicant can dispute the information provided.

- If the applicant doesn’t contact Sterling or is unable to rescind the disqualifying information, CUMC HR will send the Final Adverse Action Letter. At this point, the applicant is disqualified from working for Columbia University.
# Background Check Assignment of Duties

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| **Hiring Department** | • Makes contingent offer to finalist by utilizing the online offer letter templates located in the Manager’s Toolkit [http://managers.hr.columbia.edu/library/forms](http://managers.hr.columbia.edu/library/forms)  
• Candidates should not commence work prior to completion of the background check. If an exception is needed, contact your CUMC HR Client Manager. |
| **Candidate** | • Accepts contingent offer. |
| **Hiring Department** | • Provides Consent and Disclosure form to candidate (by e-mail, fax, US mail, or pick-up by candidate).  
• Instructs candidate to return form directly to the department by the specified date.  
• Department will pull application and CV/Resume prior to entering information into the Sterling Direct system. |
| **Candidate** | • Completes Consent and Disclosure form.  
• Returns form to Hiring Department (by e-mail, fax, US mail, or drop off). |
| **Hiring Department** | • Submits the finalist’s demographics into the Sterling Direct system or invites the finalist to complete the information themselves. The hiring department will release the information directly to Sterling to begin the verification process and will fax over the signed Consent & Disclosure form. |
| **Sterling InfoSystems** | • Conducts checks and provides results to CUMC HR and generates pre-adverse letter to candidate if necessary. |
| **CUMC HR** | • Reviews results from vendor, and conducts a comparison from the application and CV/Resume. Sends e-mail to the hiring department stating one of the following:  
1) Candidate “Cleared”.  
2) Candidate “Not Cleared” and is disqualified based on falsification. If a candidate is not cleared, CUMC HR Client Manager will advise on next steps.  
3) CUMC HR will send the [Final Adverse Action Letter](http://examples.com). At this point, the applicant is disqualified from working for Columbia University. |
| **Hiring Department** | 1) Sets start date with candidate, if cleared. |