

June 30, 2014

THOMAS LEET
Assistant Vice Chancellor
Human Resources
0922

***Subject: Human Resources – Background Checks
Audit & Management Advisory Services Project 2014-08***

The final audit report for Human Resources – Background Checks, Audit Report 2014-08, is attached. We would like to thank all members of the department for their cooperation and assistance during the audit.

The findings included in this report will be added to our follow-up system. While management corrective actions have been included in the audit report, we may determine that additional audit procedures to validate the actions agreed to or implemented are warranted. We will contact you to schedule a review of the corrective actions, and will advise you when the findings are closed.

UC wide policy requires that all draft audit reports, both printed (copied on tan paper for ease of identification) and electronic, be destroyed after the final report is issued. Because draft reports can contain sensitive information, please either return these documents to AMAS personnel or destroy them. We also request that draft reports not be photocopied or otherwise redistributed.

David Meier
Director
Audit & Management Advisory Services

Attachment

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UC San Diego

AUDIT & MANAGEMENT ADVISORY SERVICES

Human Resources – Background Checks June 2014

Performed By:

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Project Number: 2014-08

*Human Resources – Background Checks
Audit & Management Advisory Services Project 2014-08*

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ATTACHMENT A – University of California Policy – PPSM 21 (Appointment)

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I. Background

Audit & Management Advisory Services (AMAS) has completed a review of the use of background checks as part of the approved audit plan for Fiscal Year 2013-14. This report summarizes the results of our review.

The University conducts background checks to promote a safe work environment, protect organizational assets, and ensure that individuals selected are the best and most qualified employees. University of California Policy – Personnel Policy for Staff Members 21 (PPSM 21), sets forth policies and procedures of the selection process for potential appointments, the scope of background checks for each applicant, and the employment of near relatives (**Attachment A**). This policy requires that the hiring, promotion, transfer or reclassification of final candidates or employees into “critical positions” is contingent upon completion of a background check. While it is ultimately the responsibility of each campus to designate critical positions on the local level, section V of the policy provides some essential elements of critical positions, as well as examples of occupations and job responsibilities that could be used to identify critical positions. For example, someone with extensive authority to commit financial resources of the University, such as controllers or financial managers, should be required to complete a criminal background check.

On a local level, responsibility for designating critical positions and ensuring that background checks are conducted in accordance with UC policy is delegated to each Vice Chancellor (VC), and in some areas is further delegated to the hiring department. Results of criminal background checks are received and reviewed by Campus Human Resources (HR), or to Health Sciences Human Resources for Health Sciences requisitions. If a criminal conviction is reported and deemed to be relevant to the candidate’s prospective job responsibilities, the results are reported to the hiring department. It is ultimately the hiring department’s decision as to whether or not a candidate will be hired based on the results of the criminal background check.

The campus works with two types of agencies for criminal background checks: Department of Justice (DOJ) and Kroll. Kroll is a consumer reporting agency that provides a variety of background check services in addition to criminal background checks. The following table summarizes key differences between these two different types of criminal background checks in terms cost and data provided.

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Type	Cost	Data Provided
DOJ	<ul style="list-style-type: none"> • DOJ (California-only check) - \$50 • DOJ & FBI (Nationwide check) - \$68 	All arrests and criminal convictions. UCSD also receives notification of arrests subsequent to hire.
Kroll	Criminal record searches: <ul style="list-style-type: none"> • \$11 per county • \$16 per federal district • \$12 per state 	Criminal convictions dating back seven years.

II. Audit Objective, Scope, and Procedures

The objective of our review was to evaluate the campus use of background checks as a mechanism to mitigate the risk of hiring candidates with a criminal past not disclosed in the application process, and to evaluate the use of background checks in screening volunteers.

In order to achieve our objectives we completed the following:

- Reviewed the following system-wide and local policies and procedures:
 - PPSM 21,
 - UCSD Implementing Procedures HR-S-1, and
 - UCSD Implementing Procedures HR-S-3;
- Interviewed the following individuals from HR:
 - Director of Talent Acquisition and Outreach Services,
 - Operations Manager, and
 - Volunteer Coordinator;
- Reviewed Hire Online requisition data for the calendar years 2012 and 2013, and determined whether a criminal background check was completed for each requisition; and
- Conducted interviews with department HR contacts in:
 - The Birch Aquarium,
 - Business & Financial Services,
 - Campus Recreation,
 - Chemistry & Biochemistry, and
 - The Dean’s Office, Division of Social Sciences.

In Fall 2011, Health Sciences Human Resources assumed responsibility for all Health Sciences recruitment processes, including the identification of critical positions and completion of criminal background checks. As of the date of our report, Health Sciences

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Human Resources continued to be in a state of transition. Consequently, our review did not include Health Sciences Human Resources background checks processes.

III. Conclusion

Based on the audit procedures performed, we concluded that the campus use of background checks as a mechanism to mitigate recruitment risk was generally adequate. However, we found that some campus departments were not in strict compliance with policy because department HR contacts were either unaware of the policy requirements, or departments did not have adequate controls in place to ensure that a background check was completed prior to hiring an employee. In addition, the Staff Volunteer Appointment policy, UCSD Implementing Procedures HR-S-3 (HR-S-3), does not advise departments on whether or not to obtain background checks for volunteer positions. These issues are discussed in further detail in the balance of this report.

IV. Observations and Management Corrective Actions

A. Compliance with UC Policy

Some campus departments were not operating in strict compliance with University requirements for criminal background checks (PPSM 21).

 **ISS.2**

Responsibility for ensuring that background checks are completed in accordance with policy was delegated to each VC area, and in some areas has been further delegated to individual departments. Each department has a designated HR contact that is responsible for facilitating the hiring process. One of the first steps in the process is to establish a job description and prepare a requisition in HireOnline. During this process, the HR contact must determine if the requisition is for a critical position, as defined in policy, and must document whether or not the hiring of an individual will be contingent upon completion of a background check. The HireOnline system contains a background check field that is used by the HR contact to document whether or not a background check is required. Once an offer has been made to fill a critical position, the department should have controls in place to ensure that the background check has been completed.

Campus HR has taken several steps to ensure that department HR contacts are aware of the policy requirements for criminal background checks. Campus HR has regularly held meeting with department HR contacts, during which background check policies were discussed. Background check requirements were also provided on the HireOnline home page.¹ Further, automated emails generated from HireOnline indicating approval to hire includes the following

¹ <https://hireonline.ucsd.edu/default.aspx>

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statement: “If required for this position, this offer is conditional upon the result of a background check, the successful completion of the pre-placement physical and/or TB screen.”

To document that background checks are completed by hiring departments for critical positions, the HireOnline system contains a feature that can be used by departments to confirm that a background check was conducted. Per Campus HR, this feature has not yet been used by any hiring department to-date.

Despite efforts by Campus HR to ensure that hiring departments comply with background check policies, some campus departments were not operating in strict compliance with policy because departmental HR contacts were unaware of the policy requirements regarding background checks. Two of the five department HR contacts that we interviewed were not familiar with PPSM 21 and, as a result, had not evaluated if a background check was necessary for their recent recruitments.

Further, based on HireOnline requisition data for calendar years 2012 and 2013, background checks were not always completed even when department HR contacts indicated that one was required. The following table provides, by VC area, the number of requisitions posted using the HireOnline system that resulted in a hire during the calendar years 2012 and 2013. The table also provides the number of requisitions for which the department HR contact determined that a background check was required, as well as the total number of criminal background checks that were actually completed for those recruitments using the DOJ Livescan or Kroll services.

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VC Area	Hire Online Data		Background Check Completed ²
	Requisitions Filled	Background Check Required per Requisition ("Yes")	
Academic Affairs	589	349	294
Research Affairs	203	112	89
Academic Senate	4	0	0
Marine Sciences	131	48	42
Business Affairs	326	275	238
Student Affairs	171	140	103
Resource Management and Planning	255	255	136
Advancement	108	103	86
Chancellor's Office	14	3	2
Totals	1801	1285	990
Percent	100%	71%	55%

Based on the data above, it appears that some departments did not have adequate controls in place to ensure that background checks were completed when department HR contacts indicated that one was required.

To ensure complete compliance with UC Policy PPSM-21, Campus HR has considered requiring criminal background checks for all recruitments. We concur that the campus should consider requiring background checks for all recruitments because:

1. The UCSD Medical Center requires background checks for all recruitments;
2. Temporary Employment Services requires background checks for the recruitment of all temporary employees;
3. The campus self-identified that 71% of other hires during calendar year 2012 and 2013 required background checks, but the process didn't always result in a background check;
4. The listing of critical positions (**Attachment A**) indicated that a vast number of positions are considered critical, and require background checks;
5. A simpler process and more effective internal control would result from a mandate for all recruitments; and
6. The process would reduce hiring risk by providing more complete disclosure of an applicant's history that may be relevant to hiring decisions.

² Source: Number of background checks completed was provided by Campus HR.

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On a system-wide level, the UC Office of the President (UCOP) has recently charged a workgroup to review and propose changes to PPSM-21. This workgroup is considering policy revisions that would require that all staff recruitments across the UC system complete a criminal background or National Sex Offender Registry check as part of the hiring process, regardless of job responsibilities. The workgroup is expected to issue a draft revision to PPSM-21 sometime during the Fall 2014 academic quarter.

Management Corrective Actions:

HR will require hiring departments to document in the HireOnline system the date that a background check was completed for positions that the department designate as critical. On a periodic basis, HR will provide each VC HR contact with a background check report showing requisitions in which a background check was required but not confirmed.

In consultation with UCOP, Campus HR will re-evaluate policy to determine if background checks should be required for all recruitments.

B. Staff Volunteer Appointment Policy

Campus Policy does not advise departments on whether they should obtain background checks for volunteer positions (HR-S-3).

Staff Volunteer Appointment is a local implementing procedure that provides requirements for departments that would like to appoint volunteers. Neither this policy nor PPSM-21 requires that University departments consider criminal background checks as part of the volunteer appointment process.

During Calendar Years 2012 and 2013, 2,687 and 2,826 individuals volunteered at UCSD, respectively. Some departments, such as Campus Recreation and Birch Aquarium, have implemented processes to ensure that volunteers performing certain duties complete a criminal background check prior to appointment. However, because system-wide policies and local implementing procedures do not require departments to consider background checks for volunteers, it is likely that volunteers are performing duties commensurate with critical positions without undergoing criminal background checks.

In February 2014, the VC External & Business Affairs and VC Resource Management and Planning charged a campus workgroup to develop local guidelines for complying with the California Child Abuse and Neglect Reporting Act (CANRA). Participation on this workgroup includes representation from Campus HR and Environmental Health & Safety (EH&S). This workgroup is

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considering the use of criminal background checks and/or the National Sex Offender Registry to screen UCSD volunteers, particularly those involved in activities that include minors.

Management Corrective Action:

Through its participation in the CANRA workgroup, HR will continue to evaluate the use of criminal background checks and the National Sex Offender Registry for screening volunteers.

University of California Policy – PPSM 21

Appointment



Responsible Officer:	Vice President – Human Resources
Responsible Office:	Human Resources
Issuance Date:	October 1, 2012
Effective Date:	October 1, 2012
Scope:	Professional & Support Staff, Managers & Senior Professionals, and Senior Management Group (SMG) Members, except for Sections III.A. through III.D. which do not apply to SMG members.

Contact:	Melanie Kwan
Email:	Melanie.Kwan@ucop.edu
Phone #:	510-987-0360

I. POLICY SUMMARY

This policy describes the selection process for potential appointments, the scope of background checks for each applicant, and the employment of near relatives.

II. DEFINITIONS

Exception to Policy: An action that exceeds what is allowable under current policy or that is not expressly provided for under policy. Any such action must be treated as an exception.

Executive Officer: The University President or Chancellor.

Top Business Officer: Executive Vice President–Business Operations for the Office of the President, Vice Chancellor for Administration, or the position responsible for the location's financial reporting and payroll as designated by the Executive Officer.

III. POLICY TEXT

A. Selection

The individual who, in the judgment of the hiring authority, possesses the qualifications required to perform the duties of the position most effectively is to be selected for the

position. The hiring authority shall give due consideration to providing promotional opportunities to University employees.

B. Preference for Reemployment or Transfer

Professional & Support Staff applicants with preference for reemployment who appear to meet the requirements of the position shall be referred to the hiring department for first consideration (see [Staff Policy 60.F. Reemployment from Indefinite Layoff](#), and [Staff Policy 81.D. Special Selection](#)).

C. Employee Applicants

With reasonable notice, an employee shall be granted reasonable time off with pay to interview for University positions.

D. Selection Procedures

Selection methods and criteria shall be job related.

The Chancellor shall designate those departments and positions for which medical examinations shall be required of all persons prior to entrance to duty. The University shall bear the cost of the medical examinations.

Candidates for employment and employees shall not be required to take a polygraph test as a condition of obtaining employment.

E. Background Checks

To ensure that individuals are selected who possess the qualifications to perform the duties of the position most effectively and who are best able to serve the University's interests, the University requires job-related background information on final candidates for critical positions and employees who are promoted, reclassified, or transferred into critical positions. Background checks may include but will not necessarily be limited to confirmation of an individual's identity, review of an individual's criminal conviction record, if any, or verification of any license, certificate, or degree required for appointment. The Chancellor shall designate certain positions as critical in accordance with guidelines included in Section V. of this policy.

Appointment to or continued employment in a critical position is contingent upon successful completion of a background check. Except for fingerprinting, a background check is completed prior to appointing a person to a critical position. A background check that includes fingerprinting may be completed after appointment, and the results shall be used to assess the employee's suitability for continued University employment.

Employment and educational reference checks normally are conducted for all positions including critical positions.

All Medical Center positions are considered critical and are subject to background checks.

Credit background checks may be conducted depending on the nature of the position, as set forth in detail in Section V. of this policy.

F. Citizenship, Work Status, and Immigration Requirements

Under federal law, the University of California may employ only individuals who are legally eligible to work in the United States as established by providing documents specified in the Immigration Reform and Control Act of 1986.

As a federal contractor, the University, must verify the work status of an employee who was hired after November 6, 1986 and is directly performing work under a federal contract or subcontract that contains an E-Verify requirement clause. Use of the E-Verify employment verification system requirements is in addition to the requirements currently specified in the Immigration Reform and Control Act of 1986.

Nonimmigrant aliens authorized to work in the U.S., including student employees, must have or agree to acquire minimum health insurance coverage. (See Group Insurance and Health Plan Regulations available in departments and the Human Resources Office.)

G. Near Relatives

Subject to the Chancellor's approval, the employment of near relatives in the same department may be permitted when such concurrent employment would be in the best interests of the University. For the purpose of this policy, a near relative is defined as a spouse, domestic partner, parent, child (including the child of a domestic partner), or sibling. In-laws and step-relatives in the relationships listed, including relatives of the domestic partner who would be covered if the domestic partner were the employee's spouse, are also defined as near relatives.

IV. COMPLIANCE / RESPONSIBILITIES

A. Implementation of the Policy

The Vice President–Human Resources is the Responsible Officer for this policy and has the authority to implement the policy. The Responsible Officer may apply appropriate interpretations to clarify the policy provided that the interpretations do not result in substantive changes to the underlying policy. The Chancellor is authorized to establish and is responsible for local procedures necessary to implement the policy.

B. Revisions to the Policy

The President is the Policy Approver and has the authority to approve policy revisions upon recommendation by the Vice President–Human Resources.

The Vice President–Human Resources has the authority to initiate revisions to the policy, consistent with approval authorities and applicable *Bylaws* and *Standing Orders* of the Regents.

The Executive Vice President–Business Operations has the authority to ensure that policies are regularly reviewed, updated, and consistent with other governance policies.

C. Approval of Actions

Actions within this policy must be approved in accordance with local procedures. Chancellors and the Vice President–Human Resources are authorized to determine responsibilities and authorities at secondary administrative levels in order to establish local procedures necessary to implement this policy.

All actions applicable to PPSM-covered staff employees who are not Senior Management Group members that exceed this policy, or that are not expressly provided for under any policy, must be approved by the Vice President–Human Resources.

D. Compliance with the Policy

The following roles are designated at each location to implement compliance monitoring responsibility for this policy:

The Top Business Officer and/or the Executive Officer at each location will designate the local management office to be responsible for the ongoing reporting of policy compliance.

The Executive Officer is accountable for monitoring and enforcing compliance mechanisms and ensuring that monitoring procedures and reporting capabilities are established.

The Vice President–Human Resources is accountable for reviewing the administration of this policy. The Director–Human Resources Compliance will periodically monitor compliance to this policy.

E. Noncompliance with the Policy

Noncompliance with the policy is handled in accordance with the Regents' [Guidelines for Corrective Actions Related to Compensation Practices](#) and [Guidelines for Resolution of Compensation and Personnel Issues Resulting from the Findings of Audits and Management Reviews](#), and Personnel Policies for Staff Members 61, 62, 63, 64, 65, and 67 pertaining to disciplinary and separation matters.

V. PROCEDURES

The Responsible Officer may develop procedures or other supplementary information to support the implementation of this policy. Such supporting documentation does not require the approval of the President.

Designation of Critical Positions

Local procedures shall be implemented in accordance with the following:

The tasks and positions listed in the accompanying table are examples and do not include all positions, functions, or tasks which may require a background check. (Per Section III.E. of this policy, all Medical Center positions are critical and subject to background checks.)

Essential Elements of Critical Positions	Examples of Occupations/ Positions to guide determination of Individual Critical Positions	Examples of Critical Position Functions or Tasks	Required Background Checks ¹
Master key access to residence and other facilities	<ul style="list-style-type: none"> • Building Engineers • Custodians • Facilities Personnel • Locksmiths • Network/IT Personnel • Telecommunications Services Managers • SMG positions (as appropriate) 	<ul style="list-style-type: none"> • Access to master keys • Access to offices for equipment repair • Access to residences and other facilities for ongoing maintenance • Maintain building security 	Criminal Conviction Record
Direct responsibility for the care, safety and security of humans or animals; or the safety and security of personal and University property.	<ul style="list-style-type: none"> • Animal Care Personnel • Camp Counselors • Child Care Services Personnel • Coaches • Counseling Services Personnel • Dispatchers • Health and Safety Personnel • Recreation Instructors • Residence Hall Managers • SMG positions (as appropriate) • Student Affairs Officers 	<ul style="list-style-type: none"> • Access to laboratories, computers & other valuable equipment • Oversee 4-H Activities • Provide employee or student counseling and advice services • Provide services for children and minors • Provide emergency care services • Work with research animals 	Criminal Conviction Record
Direct access to or responsibility for cash and cash equivalents (as defined by Business and Finance Bulletin, BUS-49) or University property disbursements or receipt.	<ul style="list-style-type: none"> • Business and Accounting Managers • Cashiers • Collection Managers • Mail Services • Management Services Officers • Storekeepers • SMG positions (as appropriate) 	<ul style="list-style-type: none"> • Cashiering • Check printing • Check writing • Distribution of employee salary or reimbursement checks • Handling/receipt of development funds • Invoice approval and payment • Petty cash disbursement • Postage meter use 	Criminal Conviction Record

¹ A criminal conviction background check will document any felony or misdemeanor convictions. Locations utilize either: (a) a campus or local police department or human resources department to conduct Live Scan fingerprinting and initiate a Department of Justice (California) and/or FBI (national) criminal conviction background check; or (b) a Consumer Reporting Agency (e.g. ChoicePoint, Kroll Inc.) to conduct a criminal conviction background check.

Essential Elements of Critical Positions	Examples of Occupations/ Positions to guide determination of Individual Critical Positions	Examples of Critical Position Functions or Tasks	Required Background Checks ¹
Direct access to or responsibility for controlled substances or hazardous materials.	<ul style="list-style-type: none"> • Custodians • Dentists • Laboratory Personnel • Nurses • Pharmacy Staff • Physicians 	<ul style="list-style-type: none"> • Access to drugs in clinical or research environments • Access to potentially hazardous chemicals • Access to radioactive and nuclear materials • Dispense prescription medication • Maintain drug formulary 	Criminal Conviction Record
Extensive authority for committing the financial resources of the University.	<ul style="list-style-type: none"> • Architects • Buyers • Controllers or Financial Managers • Deans of Administration • Directors/Managers of Purchasing, Computing, and Contracts • Engineers • Senior Managers (UCOP) • Vice Chancellor of Administration/Budget • Other SMG positions (as appropriate) 	<ul style="list-style-type: none"> • Approve insurance payments • Approve contracts • Bids and RFPs • Commit funds for programs and projects • Vendors or product purchase agreements 	Criminal Conviction Record
Responsibility for operating commercial vehicles, machinery or toxic systems that could result in accidental death, injury, or health problems.	<ul style="list-style-type: none"> • Automotive Technicians • Equipment Operators • Environmental Health and Safety Officers • Groundskeepers • Transit Drivers 	<ul style="list-style-type: none"> • Operation of heavy duty equipment or machinery or commercial vehicles • Responders to emergencies involving potentially hazardous substances 	DMV record and license class verification
A requirement for a professional license, certificate, or degree, the absence of which would expose the University to legal liability and/or adverse public reaction.	<ul style="list-style-type: none"> • Architects • Attorneys • Dentists • Employee Assistance Counselors • Engineers • Firefighters • Nurses • Pharmacists • Physicians • Police Officers • Psychologists 	<ul style="list-style-type: none"> • Counsel employees or students • Design or build facilities and offices • Patent licensing • Provide legal advice • Real estate transactions • Render medical services 	Verification of the credential, license, certificate, and/or degree

Essential Elements of Critical Positions	Examples of Occupations/ Positions to guide determination of Individual Critical Positions	Examples of Critical Position Functions or Tasks	Required Background Checks ¹
	<ul style="list-style-type: none"> SMG positions (as appropriate) 		
Direct access to and/or responsibility for information affecting national security.	<ul style="list-style-type: none"> Department of Energy Lab positions Employees whose position requires a government security clearance SMG positions (as appropriate) 	<ul style="list-style-type: none"> As defined by agency granting clearance 	Government Security Clearance
Direct access to and/or responsibility for protected, personal, or other sensitive data.	<ul style="list-style-type: none"> Auditors Development Officers and Staff Information Systems Personnel HR and Payroll Staff IT Coordinators Nurses Patient Intake and Billing Staff Physicians Programmers Registrars Staff Research Associates Student Affairs Officers Vocational Rehabilitation Counselors 	<ul style="list-style-type: none"> Persons who have access to donor information, employee or student records, personal or other restricted sensitive or confidential data, protected health information and/or restricted data (see IS-3 Electronic Information Resources) Persons who maintain inventories of restricted data or perform systems maintenance 	Criminal Conviction Record

Credit Background Checks

PPSM 21.III.E applies to all employees and applicants for staff positions. Many Senior Management Group positions will be designated as critical in accordance with the position elements, functions, or tasks in the table above. In addition to the background checks listed within these procedures, other types of background checks may be required in line with operational needs, legal requirements and other relevant considerations. Depending on the nature of the position, credit background checks may be performed to ensure that the prospective employee will be able to perform the duties of the position most effectively. However credit background checks may be performed only for positions with the following responsibilities:

- Managerial personnel;
- Sworn peace officer or other law enforcement position;
- Employees who have access to all of the following types of information of any one person (including students, faculty, staff, or other University personnel): (1)

bank or credit card account information; (2) social security number; and (3) date of birth;

- Employees who have access to confidential or proprietary information, including a formula, pattern, compilation, program, device, method, technique, or process or trade secret;
- Employees who have regular access to cash in the amount of \$10,000 or more;
- Employees who are performing duties as a named signatory on a bank or credit card account of the University, are authorized to transfer money on behalf of the University, or are authorized to enter into financial contracts on behalf of the University.

Prior to conducting a background check, locations must ensure that appropriate disclosures are made to, and consent forms are obtained from, the applicant or employee as required by applicable state and/or federal Law. If a background check will include credit related information, such as credit history or credit score, the disclosure must state the specific basis for obtaining the report (as listed above).

Additional types of background checks that a location may utilize include, but are not limited to: employment and reference checks; Department of Motor Vehicles pull notice program; and required health screenings (e.g., TB test, or other tests pursuant to Department of Transportation regulations).¹

VI. RELATED INFORMATION

- [Personnel Policies for Staff Members 60 \(Layoff and Reduction in Time from Professional and Support Staff Career Positions\)](#) (referenced in Section III.B. of this policy)
- [Personnel Policies for Staff Members 81 \(Reasonable Accommodation\)](#) (referenced in Section III.B. of this policy)
- *Personnel Policies for Staff Members* [61](#), [62](#), [63](#), [64](#), [65](#), and [67](#) (referenced in Section IV.E. of this policy)

VII. REVISION HISTORY

California Assembly Bill 22, which restricts use of consumer credit reports for employment purposes, went into effect on January 1, 2012. As a result, technical changes were made to bring PPSM 21 into compliance with legal requirements.

This policy was reformatted into the standard University of California policy template effective October 1, 2012.

As a result of the issuance of this policy, the following documents are rescinded as of the effective date of this policy and are no longer applicable:

University of California Policy – PPSM 21

- *Personnel Policies for Staff Members 21 (Appointment)*, (incorporating Systemwide Guidelines with Procedures in Section V.), dated October 2, 2009
- *Personnel Policies for Staff Members 21 (Appointment)*, dated September 9, 2006
- *Staff Personnel Policy 211 (Selection)*, dated April 1, 1991